



Project Title:	City of Los Altos 2009 Housing Element
Lead Agency Name and Address:	City of Los Altos Planning Division One North San Antonio Road Los Altos, CA 94022
Project Location:	City-wide
Project Sponsor's Name and Address:	City of Los Altos Planning Division One North San Antonio Road Los Altos, CA 94022
General Plan Designation(s):	N/A
Zoning:	N/A
Contact Person:	David Kornfield, AICP
Phone Number:	650.947.2632
Date Prepared	October 14, 2009

1.0 INTRODUCTION

This document is an Initial Study and Negative Declaration (ND) prepared pursuant to the California Environmental Quality Act (CEQA), for the 2009 City of Los Altos Housing Element (referred to as the "2009 Housing Element" or the "proposed Housing Element"). This ND has been prepared in accordance with CEQA, Public Resources Code Sections 21000 et seq., and the CEQA Guidelines.

An Initial Study is conducted by a lead agency to determine if a project may have a significant effect on the environment. In accordance with the CEQA Guidelines, Section 15064, an environmental impact report (EIR) must be prepared if the Initial Study indicates that the proposed project under review may have a potentially significant impact on the environment. A negative declaration may be prepared instead, if the lead agency prepares a written statement describing the reasons why a proposed project would not have a significant effect on the environment and, therefore, why it would not require the preparation of an EIR (CEQA Guidelines Section 15371). According to CEQA Guidelines Section 15070, a negative declaration shall be prepared for a project subject to CEQA when either:

- a) The Initial Study shows there is no substantial evidence, in light of the whole record before the agency, that the proposed project may have a significant effect on the environment, or
- b) The Initial Study identified potentially significant effects, but:
 - (1) Revisions in the project plans or proposals made by or agreed to by the applicant before the proposed negative declaration is released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
 - (2) There is no substantial evidence, in light of the whole record before the agency, that the proposed project as revised may have a significant effect on the environment.

If revisions are adopted into the proposed project in accordance with the CEQA Guidelines Section 15070(b), a mitigated negative declaration (MND) is prepared.

1.1 LEAD AGENCY

The lead agency is the public agency with primary responsibility over a proposed project. In accordance with CEQA Guidelines Section 15051(b)(1), "the lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose." Based on these criteria, the City of Los Altos will serve as lead agency for the 2009 Housing Element.

1.2 PURPOSE AND DOCUMENT ORGANIZATION

The purpose of this Initial Study and Negative Declaration is to evaluate the potential environmental impacts of the proposed 2009 City of Los Altos Housing Element. This document is divided into the following sections:

- 1.0 **Introduction:** Provides an introduction and describes the purpose and organization of this document.
- 2.0 **Project Description:** Provides a detailed description of the proposed Housing Element.
- 3.0 **Environmental Factors Potentially Affected:** Provides an identification of those environmental factors that involve a "Potentially Significant Impact."
- 4.0 **Determination:** Provides the environmental determination for the proposed Housing Element.
- 5.0 **Environmental Checklist and Evaluation:** Describes the environmental setting for each of the environmental subject areas, evaluates a range of impacts classified as "no impact," "less than significant," "potentially significant unless mitigation incorporated," or "potentially significant" in response to the environmental checklist.

This ND has been prepared in accordance with the California Environmental Quality Act, Public Resources Code Section 21000 et seq., and the State CEQA Guidelines, California Code of Regulations (CCR) Section 15000 et seq. The ND analyzes the potential impacts of the 2009 City of Los Altos Housing Element.

This is a public document to be used by the City to determine whether the proposed Housing Element may have a significant effect on the environment. The Los Altos General Plan was adopted by the City Council in 2002. The General Plan contains supporting environmental studies, as well as extensive goals and policies designed to identify and address the environmental impacts of development within the City over the long term.

2.0 PROJECT DESCRIPTION

2.1 DESCRIPTION OF THE 2009 HOUSING ELEMENT

The Draft City of Los Altos 2009 Housing Element is designed to address the projected housing needs of current and future City residents and to comply with state law requiring amendment of the Housing Element by June 30, 2009 (Section 65580–65589.8 of the Government Code). The 2009 Housing Element is the City’s policy document guiding the provision of housing to meet future needs for all economic segments of Los Altos, including housing affordable to lower-income households. The 2009 Housing Element identifies the policies and programs which the City will implement to ensure that housing in Los Altos is affordable, safe, and decent. It addresses housing needs by encouraging the provision of an adequate quantity of sites designated for multi-family housing, by assisting in affordable housing development, and through the preservation and maintenance of existing affordable housing stock.

Amendment of the Housing Element is subject to CEQA. No specific development projects are proposed as part of the 2009 Housing Element. However, the 2009 Housing Element does propose changes in land use regulations. These proposed changes include the following:

- The amendment of the Zoning Ordinance to allow emergency shelters as a permitted use by right in a yet to be determined City zoning district without a conditional use permit or other discretionary review.
- The amendment of the Zoning Ordinance to explicitly allow both supportive and transitional housing types in all residential zones.
- The amendment of the Zoning Ordinance to define single-room occupancy units (SROs) as well as allow the newly defined SROs with a conditional use permit or other discretionary review.
- The amendment of the Multi-Family Affordable Housing Ordinance (Chapter 14 Section 28) to include a series of unit thresholds at which affordable housing units will be required

The 2009 Housing Element provides policies to encourage the development of affordable housing consistent with current General Plan policies. Zoning Ordinance changes associated with implementation of the 2009 Housing Element would be minor and mainly proposed to update the Zoning Ordinance to existing state requirements, with which the City currently complies.

2.2 OBJECTIVES OF THE 2009 HOUSING ELEMENT

The 2009 Housing Element contains the following goals:

- Goal 1: Preserve the natural beauty, rural suburban atmosphere, and the high quality of residential neighborhoods to attract families with children to Los Altos.
- Goal 2: Strive to maintain a variety of housing opportunities by location and housing type.
- Goal 3: The City will create housing opportunities for people with special needs.
- Goal 4: Allow for a variety of housing densities and types in appropriate locations to accommodate housing needs at all income categories.
- Goal 5: Strive to make housing in the City available to all regardless of age, sex, race, ethnic background, marital status, veteran status, religion, or physical disability.
- Goal 6: Increase housing opportunities for Los Altos' senior population.
- Goal 7: Maximize Los Altos' sustainability through energy efficiency, water conservation and greenhouse gas reductions.
- Goal 8: Support regional efforts to advance responsible housing policy and planning and strive for timely compliance with all statutory reporting requirements.

To accomplish each Housing Element goal there are guiding policies and programs (implementation actions) that will be implemented during the 2009–2014 Housing Element period. Detailed descriptions of each guiding policy and program, as well as specific time frames, responsibility for programs, and funding sources, are provided in the City's Draft 2009 Housing Element.

2.3 ENVIRONMENTAL SETTING AND SURROUNDING LAND USES

The environmental setting consists of the areas located within the city limits of Los Altos, which is located in the northwest portion of Santa Clara County. The City of Los Altos is positioned approximately 5 miles west of the San Francisco Bay at the southern end of the peninsula. Los Altos is surrounded by Mountain View and Palo Alto to the north, Sunnyvale to the east, Cupertino to the south, and Los Altos Hills to the west.

2.4 OTHER APPROVALS REQUIRED

There are no other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement) for the proposed Housing Element. The State Department of Housing and Community Development reviews and certifies Housing Elements; however, its approval is not required for adoption by the City.

3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by the 2009 Housing Element, as indicated by the checklist and corresponding discussion on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Mandatory Findings of Significance | |

4.0 DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Planner’s Signature

Date

David Kornfield, AICP

[Planner’s Printed Name]

Planning Services Manager, City of
Los Altos

[Planning Division]

5.0 ENVIRONMENTAL CHECKLIST AND EVALUATION

5.1 EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A "No Impact" answer is adequately supported if the information shows that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on project-specific screening analysis).
- 2) All answers must take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses" may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significant.

5.1 ENVIRONMENTAL CHECKLIST

I. AESTHETICS		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

Los Altos contains many natural and manmade features that form the City's unique physical character. The City is predominantly residential, with limited commercial, park, and public lands. Los Altos has a relatively flat terrain with mature trees and landscape. Significant groves of trees are located in open space areas and along the creek corridors. Tree-lined collector and arterial streets are characteristic throughout the community. The City even has a few remnants of orchards.

The majority of the City was developed between 1950 and 1970, resulting in a consistent development pattern and architectural appearance throughout the residential community. Over 82 percent of the City's land is designated for housing, the majority of which are low-density single-family lots with 10,000 square foot minimum lot sizes. Most neighborhoods were developed in the 1950s and 1960s with single-story "California Ranch" style homes on large lots fronting on mostly semi-rural-appearing streets exclusive of curbs, gutters, and sidewalks.

Los Altos' open space resources include public parks, publicly owned open space, conservation easements along portions of creeks, off-road bicycle paths/trails, and privately owned open space. The City's creeks (Adobe Creek, Hale Creek, Permanent Creek, and Stevens Creek) are an important natural resource and open space amenity within the community. As Los Altos and its immediate surroundings are mostly urbanized (Los Altos is surrounded by other developed communities including Mountain View, Sunnyvale, Cupertino, Los Altos Hills, and Palo Alto), significant vegetation communities and biological resources have not been identified and are not likely to exist within the City Planning Area. However, riparian corridors and tree groves exist along most creek corridors and within the Redwood Grove Nature Preserve. These areas provide habitat for a variety of plants and animals. Many mature trees are also visible throughout the City's low-density residential neighborhoods, parks, and school sites.

Discussion/Conclusion:

a) No Impact. The Los Altos General Plan does not identify any scenic vistas within the City Planning Area. The 2009 Housing Element would not adversely affect a scenic vista. Therefore, no impact would occur.

b-c) Less Than Significant Impact. The proposed Housing Element is a policy-level document. While the Housing Element encourages the provision of a range of housing types and affordability levels, it does not include any specific designs or proposals, nor does it grant any entitlements for development that would degrade the existing visual character of the City. The Housing Element anticipates land uses that are consistent with the land use designations established by the General Plan. Future residential development projects will require compliance with the General Plan Community Design and Historic Resources Element policies related to aesthetic resources and Zoning Code requirements associated with planning and development regulations (e. g., Chapters 14.76 and 14.78 of the City Municipal Code). The strategies contained within the General Plan relative to urban design, pedestrian circulation, community and neighborhood identity, as well as residential and commercial project design, would ensure physical, visual, and functional compatibility between residential and other uses, as well as encourage high-quality development in keeping with the desired character of the City.

In addition, subsequent residential development projects would be subject to a series of development standards documents which include the Downtown Urban Design Plan and the Tree Protection Ordinance (Chapter 11.08 of the City Municipal Code). The Downtown Urban Design Plan contains recommendations with the goal to improve the visual quality of the downtown area and to create a pedestrian-friendly environment. The City's Tree Protection Ordinance establishes a process for designation of heritage and landmark trees and requires approval of tree removal permits for protected trees.

Implementation of the proposed Housing Element would result in less than significant impacts associated with the degradation of the visual character of the City.

d) Less than Significant Impact. As discussed under **b-c)** above, the proposed Housing Element is a policy-level document that does not include any specific development designs or proposals, nor does it grant any entitlements for development that would increase daytime glare or nighttime illumination in the City. Future residential development projects within the City would be required to be designed and constructed in accordance with Zoning Code requirements associated with planning and development regulations (Chapters 14.76 and 14.78 of the City Municipal Code). Furthermore, light and glare impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, implementation of the proposed Housing Element would result in less than significant impacts associated with increased light and glare.

II. AGRICULTURAL RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
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"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

The majority of the City was developed between 1950 and 1970 and its immediate surroundings are mostly urbanized. Los Altos is surrounded by other developed communities including Mountain View, Sunnyvale, Cupertino, Los Altos Hills, and Palo Alto.

The Important Farmland Map for Santa Clara County designates the entire City as "Urban and Built Up Land." Urban and Built Up Land is defined as land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Common examples of land uses associated with this category include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures.

Discussion/Conclusion:

a-b) No Impact. Future development consistent with housing need identified for the City would not result in the direct conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as these farmland categories do not exist within the City. The proposed Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels. It does not include any site-specific designs or proposals nor does it grant any entitlements for development that would convert agricultural lands to nonagricultural uses or place housing units adjacent to agricultural uses. The Housing Element anticipates land uses that are consistent with the land use designations established by the General Plan Land Use Element.

The Important Farmland Map for Santa Clara County does not identify any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the City Planning Area and instead designates the entire City as Urban and Built Up Land. The General Plan does not identify any Williamson Act lands. Therefore, impacts associated with the conversion of agricultural lands to nonagricultural uses, as well as impacts associated with conflicts with agricultural zoning and Williamson Act lands, would be considered to have no impact.

No Impact. The placement of nonagricultural uses adjacent to agricultural uses can result in agriculture-urban interface conflicts that inadvertently place growth pressure on agricultural lands to convert to urban uses. As previously mentioned, however, the City is mostly urbanized and surrounded by other developed communities including Mountain View, Sunnyvale, Cupertino, Los Altos Hills, and Palo Alto. Since there is no known Farmland in or near the City the affects associated with changes in the existing environment, which due to their location or nature that could result in conversion of Farmland to nonagricultural use, are of no impact.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
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"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in significant construction-related air quality impacts?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

Los Altos is located in Santa Clara County, which is in the southern region of the San Francisco Bay Area Air Basin.

The Bay Area Air Quality Management District (BAAQMD) is responsible for establishing and enforcing local air quality rules and regulations that address the requirements of federal and state air quality laws. Currently, the San Francisco Bay Area Air Basin is designated as nonattainment for the federal 8-hour and 1-hour ozone standard, the state 1-hour ozone standard, and the state PM₁₀ and PM_{2.5} standards.

The California Clean Air Act (CCAA) of 1988 requires the air districts to endeavor to achieve and maintain the state ambient air quality standards by the earliest practicable date and develop plans for attaining the state air quality standards. In 1999, BAAQMD, the Association of Bay Area Governments (ABAG), and the Metropolitan Transportation Commission (MTC) adopted the 1999 Ozone Attainment Plan (OAP), which was submitted to the California Air Resources Board (CARB) in June 1999. The OAP is the Bay Area's portion of California's State Implementation Plan to achieve the national ozone standard. The 2000 Bay Area Clean Air Plan (CAP) is a plan to reduce ground-level ozone levels in the San Francisco Bay Area and attain the state 1-hour

ozone standard. The California Clean Air Act requires all air districts exceeding the state ozone standard to reduce pollutant emissions by 5 percent per year, calculated from 1987, or achieve emission reductions through all feasible measures. The CCAA further requires that the CAP be updated every three years.

The federal Environmental Protection Agency (EPA) made a final finding in April 2004 that BAAQMD had attained the national 1-hour ozone standard. As a result, certain planning commitments outlined in the 2001 OAP were no longer required. While EPA has prepared a finding of attainment for the region, the Bay Area has not been formally reclassified as an attainment area for the 1-hour standard. In order to be reclassified as an attainment area, the region must submit a redesignation request to EPA.

Discussion/Conclusion

a) *Less Than Significant Impact.* A project would conflict with or obstruct implementation of the regional air quality attainment plans (the Bay Area Clean Air Plan and/or the Ozone Attainment Plan) if it is inconsistent with the growth assumptions, in terms of population, employment, or regional growth in vehicle miles traveled. These population forecasts are developed, in part, on data obtained from local jurisdictions and projected land uses and population projections identified in community plans. Projects that result in an increase in population growth that is inconsistent with local community plans would be considered inconsistent with the Bay Area Clean Air Plan and the Ozone Attainment Plan.

Certain policies in the Housing Element propose changes to existing densities, as well as changes to land use regulations. However, those policies do not include any specific development designs or proposals, nor do they grant any entitlements for development. The proposed Housing Element does not identify specific development. Although the Housing Element does, for example, identify the need to allow emergency shelters and transitional and supportive housing as permitted uses in a yet to be determined City zoning district without a conditional use permit as well as the need to amend the Zoning Ordinance to include a series of unit thresholds at which affordable housing units will be required, the project does not involve the construction or expansion of residential development. All future development would be required to be in accordance with local regulations, including the General Plan and Zoning Ordinance. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Furthermore, future residential development projects will require compliance with General Plan policies and programs related to air quality, including policies and programs intended to reduce the consumption of fossil fuels and the use of private motor vehicles (Natural Environment and Hazard Element Policy 8.2 and Implementation Program NEH 29). Therefore, impacts associated with obstructing implementation of the regional air quality attainment plan would be less than significant.

b-d) *Less Than Significant Impact.* All ambient air quality standards except national standards for ozone and the state standards for ozone and PM are met in the Los Altos area. The state ambient standards of ozone are sometimes exceeded (sufficient data is lacking to access PM₁₀ emissions) (CARB, 2009). Future development of housing units facilitated by the proposed Housing Element could result in an increase in criteria pollutants during both construction and operational activities and could also contribute substantially to the existing nonattainment status of the San Francisco Bay Area Air Basin. Construction activities such as excavation and grading operations, construction vehicle traffic, and wind blowing over exposed earth could generate exhaust emissions and fugitive particulate matter emissions that would affect local air quality. This is variable depending on the weather, soil conditions, and the amount of activity taking

place, as well as the nature of dust control efforts. Likewise, operational air quality impacts are dependent on the types of land uses and mitigation being used.

The proposed Housing Element does not include any specific development designs or development proposals, nor does it grant any entitlements for development. Certain policies in the Housing Element propose changes to existing land use densities and land use regulations. All future development would be required to be in accordance with local regulations, including the General Plan and Municipal Code. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Furthermore, future residential development projects will require compliance with General Plan policies related to air quality (Natural Environment and Hazards Element Policies 8.1 through 8.4 and Implementation Programs NEH 29 and NEH 30).

The proposed Housing Element would have less than significant impacts associated with contributing substantially to an existing or projected air quality violation and increasing criteria pollutants during both construction and operational activities.

e) Less than Significant Impact. Housing units facilitated by the proposed Housing Element would be considered sensitive receptors that could be exposed to pollutant concentrations. However, as discussed under **a)** and **b-d)** above, the proposed Housing Element does not include any specific development designs or development proposals, nor does it grant any entitlements for development. Future residential development would be required to comply with General Plan policies related to air quality, conform to both the Bay Area Clean Air Plan and the Ozone Attainment Plan, and meet National Ambient Air Quality Standards (NAAQS) and BAAQMD thresholds during both construction and operational activities. Therefore, the proposed Housing Element would have less than significant impacts associated with exposing sensitive receptors to pollutant concentrations.

f) No Impact. Residential and commercial developments are not in themselves considered to be an emission source that would result in objectionable odors. No impact would occur.

IV. BIOLOGICAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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"/>

Setting:

Despite being mostly urbanized, the Los Altos Planning Area includes natural resources. Natural resources in Los Altos include creek channels, mature groves of trees, and remaining orchards. Creeks provide water resources, visual open space corridors, and riparian habitat for a variety of species. The City's creeks (Adobe Creek, Hale Creek, Permanente Creek, and Stevens Creek) are an important natural resource and open space amenity within the community. Mature

groves of trees are scattered throughout the City's residential neighborhoods, along creek corridors, and within parks such as the Redwood Grove Nature Preserve.

Discussion/Conclusion:

a) *Less Than Significant Impact.* Future residential development projects consistent with the 2009 Housing Element could result in impacts to biological resources. Site-specific field studies are generally required to search for special-status species and to determine whether suitable habitat for any special-status species occurs on or near a study area. The proposed Housing Element is a policy-level document. While it encourages the provision of a range of housing types and affordability levels, it does not include any specific development designs or development proposals, nor does it grant any entitlements for development. Although the Housing Element does propose changes to existing land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including General Plan Open Space, Conservation, and Community Facilities Element Policies 2.2, 2.3, 2.4, 2.5, and 2.7 and Implementation Program OCC3. Policies 2.2, 2.3, 2.4, 2.5, and 2.7 seek to preserve and protect natural areas which are valuable natural resources, which benefits special status species. Implementation Program OCC3 assess development proposals for potential impacts to significant natural resources pursuant to CEQA and require appropriate mitigation for all significant impacts if impact avoidance is not possible.

Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, adverse impacts to special-status plant and animal species, as well as their habitats, would be less than significant.

b-c) *Less than Significant Impact.* Future residential development within the City could result in adverse impacts to sensitive natural communities such as riparian habitat and federally protected wetlands. As discussed under **a)** above, the proposed Housing Element does not include any specific development designs or development proposals, nor does it grant any entitlements for development. While the 2009 Housing Element does propose changes to existing land use densities and land use regulations, future residential development projects will be required to comply with the federal Clean Water Act (CWA) Section 404, which regulates the discharge of dredged and fill materials into waters of the United States. Waters of the United States refers to oceans, bays, rivers, streams, lakes, ponds, and wetlands. Development applicants must obtain a permit from the U.S. Army Corps of Engineers (USACE) for all discharges of dredged or fill material into waters of the United States, including streams, before proceeding with a proposed activity. Furthermore, future residential development projects will be required to comply with General Plan Open Space, Conservation, and Community Facilities Element Policies 2.3, 2.5, and 2.7 as well as Implementation Program OCC3, which address riparian and wetland resources.

Therefore, adverse impacts to federally protected wetlands and riparian resources would be less than significant.

d) *Less than Significant Impact.* As discussed under **a)** above, the proposed Housing Element is a policy-level document and while it proposes changes to existing land use densities and land use regulations, it does not include any site-specific designs or development proposals, nor does it grant any entitlements for development. The potential for the proposed Housing Element to impede native resident or migratory wildlife corridors or the uses of wildlife nursery sites cannot be determined as no specific details regarding future land use development are

provided. While additional impacts may result from the implementation of future individual residential projects within the areas of the City affected by the Housing Element's proposed regulatory changes, environmental review would be required of these future proposals and would identify and provide mitigation for any impacts to native wildlife corridors and nursery sites. Therefore, impacts would be less than significant.

e) No Impact. Currently, there are two ordinances protecting biological resources in the City (Tree Protection Regulations, Chapter 11.08 of the Municipal Code; Watercourse Protection Regulations, Chapter 6.32 of the Municipal Code)). However, as discussed under **a-d)** above, the proposed Housing Element does not include any specific development proposals, nor does it grant any entitlements for development that would affect biological resources. Therefore, the proposed Housing Element would not conflict with any local policies or ordinances protecting biological resources.

f) No Impact. The City is located just northeast of the Santa Clara Valley Habitat Conservation Plan. However the City of Los Altos is not within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impact would occur.

V. CULTURAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

The City of Los Altos is within the historic territory of the Tamyen (Tamien) tribelet of the Costanoan Indians (alternatively the Ohlone). The closest Tamien village has been identified as San José Cupertino. The village was located in the mountains and valleys of the upper Pescadero Creek, Stevens Creek, and Saratoga Creek watersheds. Before Spanish colonization, the Ohlone lived in more than 50 distinct landholding groups, with no view of themselves as one unified group of people. They survived by hunting, fishing, and gathering, in the typical ethnographic California pattern. From 1769 to 1833, Spanish policies, including the Spanish missions in California, brought tremendous upheaval, hardship, and decimation to the Ohlone people.

The Spanish philosophy of government in northwestern New Spain led to the founding of presidios, missions, and secular towns with the land held by the Crown (1769-1821). Subsequent Mexican policies stressed individual ownership of the land, so during the Mexican Period (1822-1846/1848), tracts of land were granted to individuals.

The townsite of Los Altos was laid out by the Altos Land Company in 1908, as a result of the expansion of interurban train service, the Suburban Interurban Railroad, and the development of small communities or suburbs throughout the Santa Clara Valley.

Discussion/Conclusion:

a-d) Less than Significant Impact. Future residential development within the City could conflict with existing known cultural and historical resources in the City. In addition to “known” resource areas, there is the potential that there are undiscovered paleontological and archeological resources that would be encountered and potentially impacted by future construction activities. These resources could include human remains located outside of cemeteries. The Housing Element is a policy-level document. While the Housing Element encourages the provision of a range of housing types and affordability levels, it does not include any specific development designs or proposals, nor does it grant any entitlements for development that would adversely

affect archaeological, paleontological, or historic resources. While the Housing Element does propose changes to existing land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including the General Plan Community Design and Historic Resources Element. Implementation Program CDHR 13 assesses development proposals for potential impacts to significant cultural resources pursuant to Section 15064.5 of the CEQA Guidelines and requires a study conducted by a professional archaeologist for projects located near creeks or identified archaeological sites to determine if significant archaeological resources are potentially present and if the project will significantly impact the resources. If significant impacts are identified, the development project is required to be modified to avoid the impacts or to mitigate the impacts.

Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal.

Therefore, impacts to cultural resources, including archaeological, paleontological, and historic resources, as well as human remains, are considered less than significant.

VI. GEOLOGY AND SOILS	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>

Setting:

The City of Los Altos is located in a region with active seismic faults and is therefore subject to risk of hazards associated with earthquakes. Seismic activity poses two types of hazards: primary and secondary. Primary hazards include ground rupture, ground shaking, ground displacement, and subsidence and uplift from earth movement. Primary hazards can induce secondary hazards including ground failure (lurch cracking, lateral spreading, and slope failure),

liquefaction, water waves (tsunamis and seiches), movement on nearby faults (sympathetic fault movement), dam failure, and fires.

No known active faults traverse the Los Altos Planning Area and no Alquist-Priolo Earthquake Fault Zoning has been established by the state in the Planning Area. However, the City is located between the active San Andreas and Hayward faults, as well as numerous smaller faults.

Discussion/Conclusion:

a)

i-iii) *Less than Significant Impact.* The Housing Element includes policies and programs designed to facilitate the construction and conservation of housing which could increase exposure of people and structures to seismic hazards, including rupture of a fault, strong seismic shaking, and seismic-related ground failure. However, the Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels rather than identifying any specific designs or development proposals. While the Housing Element does propose changes to land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including the General Plan and Zoning Ordinance. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal.

In addition, future residential development projects would be required to comply with the General Plan Natural Environment and Hazards Element. For instance, Policy 1.3 requires soil analysis and erosion mitigation for all development proposed on sites known to be prone to erosion or ground failure. Implementation Program NEH 1 assesses development proposals for potential seismic/geologic hazards pursuant to CEQA and requires measures to mitigate all identified significant public safety hazards. Implementation Program NEH 4 states that during the review of development proposals, surveys of soil and geologic conditions by a state-licensed engineering geologist shall be required where appropriate. The purpose of the surveys is to determine the geologic stability of the site and identify design measures to minimize geologic hazards. The project design recommendations are required as conditions of the project approval. In addition, all future residential developments would be required to conform to Uniform Building Code (UBC) requirements that are intended to be sufficient to prevent significant damage from ground shaking during seismic events.

Therefore, impacts related to seismic hazards would be considered less than significant.

iv) *Less than Significant Impact.* Landslides are most likely on hillsides where rock strata parallels surface slopes, high clay content absorbs excess water, displacement has fractured a fault zone, or the base of a slope has been removed by erosion or people. Landslides are unlikely to occur where slopes are less than 15 percent. Within the Los Altos Planning Area, slopes that are 15 percent or more are isolated to the southwest portions of the City. Implementation Program NEH 4 states that during the review of development proposals, surveys of soil and geologic conditions by a state-licensed engineering geologist shall be required where appropriate. The purpose of the surveys is to determine the geologic stability of the site and identify design measures to minimize geologic hazards. The project design recommendations are required as conditions of the project approval. Implementation Program NEH 5 restricts development on slopes greater than 30 percent.

Therefore, impacts associated with landslides are considered to be less than significant.

b) *Less than Significant Impact.* Future construction within the City would result in the moving and grading of topsoil, which would lead to disturbed soils that are more likely to suffer from erosion from a variety of sources, such as wind and water. As discussed under **a) i-iii)** above, the proposed Housing Element is a policy-level document that does not propose any specific development and does not directly result in adverse impacts associated with substantial loss of topsoil or erosion. Any future residential developments would be subject to the Santa Clara Valley Urban Runoff Pollution Prevention Program, which is an association of 13 cities and towns in the Santa Clara Valley, together with Santa Clara County and the Santa Clara Valley Water District with the goal of reducing pollution in urban runoff to the “maximum extent practicable.” The program incorporates regulatory, monitoring, and outreach measures aimed at improving the water quality of South San Francisco Bay and the streams of the Santa Clara Valley, which involves the prevention of erosion and the sedimentation.

Since the proposed Housing Element does not involve the construction or expansion of any residential land uses, identification of environmental impacts associated with specific future developments or policies would be speculative at this time. Therefore, erosion impacts resulting from the proposed Housing Element would be less than significant.

c-d) *Less than Significant Impact.* Future residential development on unstable or expansive soils could create substantial risks to life or property and result in adverse impacts such as on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. As discussed under **a) i-iii)** above, the proposed Housing Element is a policy-level document that does not propose any specific development. While the Housing Element does propose changes to land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including Implementation Program NEH 4 of the General Plan Natural Environment and Hazards Element, which states that during the review of development proposals, surveys of soil and geologic conditions by a state-licensed engineering geologist shall be required where appropriate. The purpose of the surveys is to determine the geologic stability of the site and identify design measures to minimize geologic hazards. The project design recommendations are required as conditions of the project approval.

In addition, environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, impacts resulting from the proposed Housing Element associated with unstable and/or expansive soils would be less than significant.

e) *No Impact.* The Housing Element includes policies and programs designed to facilitate the construction and conservation of housing. The Palo Alto Regional Water Quality Control Plant provides wastewater collection and treatment services within the city limits. No septic or alternative wastewater systems would be installed as a result of the proposed project. Therefore, no impacts would occur.

VII. HAZARDS AND HAZARDOUS MATERIALS	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
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, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>

Setting:

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. According to California Health and Safety Code Section 25501(o), "Hazardous material" means any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment. Searches of the Department of Toxic Substance Control's EnviroStor database (DTSC, 2009) and the State Water Resources Control Board Geotracker database (SWRCB, 2009) identified 41 hazardous material sites in Los Altos that are associated with a hazardous material related release or occurrence.

There are no airport-related facilities in the city limits of Los Altos. The closest major airport is located in San Jose approximately 8 miles to the east.

Discussion/Conclusion:

a-d) Less Than Significant Impact. Future development of residential housing units consistent with the Housing Element could create a significant hazard to future residents through exposure to the routine transport, use, or disposal of hazardous materials, through exposure to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, through exposure from the handling or emission of hazardous materials, or by locating residential development on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, impacts associated with hazardous materials would be dependent on the location of future residential development and the nature of surrounding land uses. The proposed Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels, but does not include any specific development designs or development proposals, or grant any entitlements for development.

The County of Santa Clara Department of Environmental Health, which is the Certified Unified Program Agency (CUPA) for Los Altos, issues permits to and conducts inspections of businesses that use, store, or handle quantities of hazardous materials and/or waste greater than or equal to 55 gallons, 500 pounds, or 200 cubic feet of a compressed gas at any time. The County of Santa Clara Department of Environmental Health also implements the Hazardous Material Management Plans (Business Plans) that include an inventory of hazardous materials used, handled, or stored at any business in the City of Los Altos. The County of Santa Clara Department of Environmental Health also issues permits to and inspects businesses that handle acutely hazardous materials, such as those used in research and development facilities, and helps local fire departments respond to emergencies involving hazardous materials.

The City of Los Altos regulates hazardous materials in coordination with other state and local agencies (e.g., Department of Toxic Substance Control and the County of Santa Clara Department of Environmental Health).

Additionally, residential developments do not generally include the routine transportation, use, or disposal of hazardous materials that could create a significant hazard to the public. Therefore,

the proposed Housing Element would not create a significant hazard to the public or the environment regarding the transport, storage, use, and disposal of hazardous materials.

e-f) *Less Than Significant Impact.* Airport-related hazards are generally associated with aircraft accidents, particularly during takeoffs and landings. Airport operation hazards include incompatible land uses, power transmission lines, wildlife hazards (e.g., bird strikes), and tall structures that penetrate the imaginary surfaces surrounding an airport. As discussed under **a-d)** above, the proposed Housing Element is a policy-level document that does not propose any specific development. While the proposed Housing Element does identify the need for increased density, it does not provide specific details regarding specific future development. Furthermore, the City is not located within an airport comprehensive land use plan. Therefore impacts resulting from the proposed Housing Element associated with airport-related hazards would have a less than significant impact.

g) *Less Than Significant Impact.* The City of Los Altos Emergency Preparedness Manual has been prepared by Los Altos residents in close cooperation with the City of Los Altos. It draws extensively upon emergency plans and advice of other cities with similar needs for emergency preparedness. The goal of the manual is to provide key information to all Los Altos residents so that they may take the steps needed to avoid personal injury, minimize the risk of fire and home damage, and become totally self sufficient for three to five days in the event of a major disaster. In addition, the City has adopted an Emergency Preparedness Plan identifying potential risks, facilities, and resources relied upon in the event of a catastrophe and persons responsible for implementation. The City's Emergency Preparedness Committee determines the appropriate means of community support, develops and implements programs to educate and prepare the community for emergencies, and advises the City Council.

As discussed under **a-d)** above, the proposed Housing Element is a policy-level document that does not propose any specific development. While the Housing Element does propose changes to existing land use densities and land use regulations, it does not involve the construction or expansion of any residential uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including the General Plan and Municipal Code. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, impacts resulting from inconsistencies with adopted emergency response plans would be less than significant.

h) *No Impact.* The California Department of Forestry and Fire Protection, Natural Hazard Disclosure (Fire) map shows that the City does not contain any land designated as "Wildland Area That May Contain Substantial Forest Fire Risks and Hazards" or as a "Very High Fire Hazard Severity Zone - AB 337" (CalFire, 2000). Therefore, no wildland fire impacts would occur.

VIII. HYDROLOGY AND WATER QUALITY

Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

VIII. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

The City's creeks (Adobe Creek, Hale Creek, Permanente Creek, and Stevens Creek) are an important natural resource and open space amenity within the community. The creeks and associated floodplain areas provide recreational opportunities as well as valuable open space for preservation of biological resources and riparian habitat.

Flood hazards fall into three categories: natural flooding, dam inundation, and mud and debris flows. Los Altos is subject to periodic flood hazards associated with creek overflow, dam inundation, and potential mud and debris flows during rain storms of a few hillsides within the Planning Area. The Los Altos Planning Area contains both 100- and 500-year floodplain areas located along the City's four creeks (Adobe Creek, Hale Creek, Permanente Creek, and Stevens Creek) as well as in several regions along the eastern boundary of the City.

Natural flooding occurs when major rainstorms cause stream overflows. Portions of the four creeks flowing through Los Altos have been channelized to increase the capacity of the creeks to reduce flooding and to permit development of the floodplain. Adobe Creek is the most flood-prone of Los Altos creeks. The Santa Clara Valley Water District and the City have adopted *Guidelines and Standards for Land Use Near Streams*, which apply setback requirements along the creek. Subdivisions along creekside lots require property owners to dedicate an easement or fee title to the water district if determined necessary. In accordance with the adopted watercourse protection regulations, special setbacks are required and development restrictions applied along Adobe Creek from Shoup Park to O'Keefe Lane. Los Altos participates in the National Flood Insurance Program (NFIP), which is administered by the Federal Emergency Management Agency (FEMA). The NFIP provides federal flood insurance and federally financed loans for property owners in flood-prone areas that develop in accordance with the City's Flood Hazard Area Regulations.

Dam inundation could occur with the failure of the Stevens Creek Dam. California Government Code Section 8589.5 requires the City to have in place emergency procedures for the evacuation and control of populated areas within the limits of inundation below dams

Mud and debris flows originate in hillside areas having deep topsoils with poor drainage. The majority of the Los Altos Planning Area is relatively flat terrain that is not subject to mud and debris flows. The rolling terrain in the southwest portion of the Planning Area contains deep soils consisting of silt, clay, sand, and gravel deposits. There are no recent examples of mud or debris flows in the Planning Area.

The City is located atop the Santa Clara Valley subbasin, which is located within the Santa Clara Valley Groundwater Basin. The Santa Clara Valley subbasin occupies a structural trough parallel to the northwest-trending Coast Ranges. The Diablo Range bounds the subbasin on the west

and the Santa Cruz Mountains form the basin boundary on the east. The subbasin extends from the northern border of Santa Clara County to the groundwater divide near the town of Morgan Hill. The dominant geo-hydrologic feature is a large inland valley that is drained to the north by tributaries to San Francisco Bay including Coyote Creek, the Guadalupe River, and Los Gatos Creek. Annual precipitation for the Santa Clara basin ranges from less than 16 inches in the valley to more than 28 inches in the upland areas (DWR, 2006).

Historically, since the early 1900s through the mid-1960s water level declines from groundwater pumpage have induced subsidence in the Santa Clara Valley subbasin and caused degradation of the aquifer adjacent to the bay from saltwater intrusion. Prior to importation of surface water via the Hetch Hetchy Aqueduct and South Bay Aqueduct and the introduction of an artificial recharge program, water levels declined more than 200 feet in the Santa Clara Valley (DWR, 2006). Groundwater levels have generally increased since 1965 as a result of increase in recharge and decreases in pumpage (DWR, 2006).

Operational groundwater storage capacity is an estimate of the storage capacity based on district operations. Operational storage capacity is generally less than total storage capacity. It must account for available pumping capacity, avoidance of land subsidence, and problems associated with high groundwater levels. The operational storage capacity of the Santa Clara Valley subbasin is estimated to be 350,000 acre-feet (DWR, 2006).

Discussion/Conclusion:

a) and f) Less than Significant Impact. Future residential development within the City could result in both construction and operational impacts to water quality and discharge standards. Potential operational impacts include the use of fertilizers, herbicides, and pesticides to maintain lawns, as well as motor vehicle operation and maintenance. Potential construction impacts include grading and vegetation removal activities that would result in the exposure of raw soil materials to the natural elements (wind, rain, etc.). However, the purpose of the proposed Housing Element is to identify the policies and programs which the City will implement to ensure that housing in Los Altos is affordable, safe, and decent. The proposed Housing Element is a policy-level document that does not include any specific design or development proposals, nor does it grant any entitlements for development. Therefore, identification and analysis of water quality impacts associated with the proposed Housing Element would be speculative at this time. While the Housing Element does propose changes to land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including the General Plan Open Space, Conservation, and Community Facilities Element (Policies 2.3, 2.4, 2.5, and 2.7, and Implementation Programs OCC 3 through OCC 5). Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal.

In addition, all new development projects in the City are subject to the requirements of the National Pollution Discharge Elimination System (NPDES) Stormwater Permit enforced by the Regional Water Quality Control Board (RWQCB). The permit requires that the City impose water quality and watershed protection measures for all development projects and prohibits discharges from causing violations of applicable water quality standards or from resulting in conditions that create a nuisance or water quality impairment in receiving waters. Any future residential developments would be subject to the Santa Clara Valley Urban Runoff Pollution Prevention Program, which is an association of 13 cities and towns in the Santa Clara Valley, together with Santa Clara County and the Santa Clara Valley Water District with the goal of reducing pollution in urban runoff to the maximum extent practicable. The program

incorporates regulatory, monitoring, and outreach measures aimed at improving the water quality of South San Francisco Bay and the streams of the Santa Clara Valley.

Therefore, water quality and waste discharge impacts would be less than significant.

b) *Less than Significant Impact.* All domestic and commercial water in Los Altos is supplied by the California Water Service Company and financially supported by user fees. According to the City General Plan (City of Los Altos, 2002), 28 percent of the City's water comes from well water and 72 percent comes from Santa Clara Valley Water District (SCVWD) sources, which include underground aquifers, reservoirs, and the San Joaquin-Sacramento River Delta. As previously mentioned, groundwater levels of the Santa Clara Valley subbasin underlying the City have generally increased since 1965 as a result of increases in recharge and decreases in pumpage (DWR, 2006).

In addition and as discussed under **a)** and **f)** above, the proposed Housing Element does not identify any specific development or grant any entitlements for development. Therefore, impacts would be less than significant.

c-e) *Less than Significant Impact.* The proposed Housing Element encourages the development of a range of housing types at varying affordability levels within Los Altos. If development of housing units were to occur in previously undeveloped areas, increased impervious surfaces and grading and vegetation removal activities could increase surface runoff and could therefore exceed the capacity of existing stormwater drainage systems and increase the potential for localized flooding and/or erosion. However, the proposed Housing Element is a policy-level document that does not include any specific designs or development proposals, nor does it grant any entitlements for development. While the Housing Element does propose changes to land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including the General Plan and Municipal Code. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal.

Future residential development projects in the City are subject to the requirements of NPDES Stormwater Permit number CA0029718 enforced by RWQCB. The permit requires that the City impose water quality and watershed protection measures for all development projects and prohibits discharges from causing violations of applicable water quality standards or from resulting in conditions that create a nuisance or water quality impairment in receiving waters. A key component of the NPDES permit is the implementation of the Stormwater Quality Improvement Plan (SQIP) for the City, which requires stormwater quality treatment and/or best management practices (BMPs) in project design for both construction and operation. There are several regulations/procedures in place that implement the SQIP, including Los Altos' participation in the Santa Clara Valley Urban Runoff Pollution Prevention Program, which is an association of 13 cities and towns in the Santa Clara Valley, together with Santa Clara County and the Santa Clara Valley Water District with the goal of reducing pollution in urban runoff to the maximum extent practicable. The program incorporates regulatory, monitoring, and outreach measures aimed at improving the water quality of South San Francisco Bay and the streams of the Santa Clara Valley. Compliance with the provisions of the NPDES, BMPs, and the Santa Clara Valley Urban Runoff Pollution Prevention Program would reduce the impacts of future development.

Therefore, the proposed Housing Element would not result in significant impacts to drainage or runoff as no development is proposed and future development envisioned by the Housing Element would be subject to the regulations discussed above.

g-h) Less than Significant Impact. Portions of the City are located within the FEMA-designated 100-year flood zone. However, as discussed under **a-f)** above, the proposed Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development. Future development projects would be subject to General Plan policies that regulate land uses in flood-prone areas and allow development in those areas only with appropriate mitigation (Natural Environment and Hazards Element Policies 2.1 through 2.3). In addition, Chapter 6.32 of the City Municipal Code seeks to regulate for the flood protection of properties adjacent to City waterways. Therefore the proposed Housing Element would not place structures within a 100-year flood zone and impacts would be less than significant.

i) No Impact. The City is located downstream from the Stevens Creek Dam. Dam inundation within the City could occur with the failure of this dam. California Government Code Section 8589.5 requires the City to have in place emergency procedures for the evacuation and control of populated areas within the limits of inundation below dams. As previously stated, Los Altos participates in the National Flood Insurance Program, which is administered by FEMA. The NFIP provides federal flood insurance and federally financed loans for property owners in flood-prone areas.

In California, the Department of Water Resources, Division of Dam Safety is responsible for ensuring that all dams satisfy stringent design criteria covering all possible conditions that could affect the dam, including earthquakes and flood events, without considering probability factors. Therefore, dams are designed to withstand the largest and strongest earthquake that could conceivably affect them. Similarly, dams are required to withstand the largest possible flood that could occur, which is referred to as the maximum probable flood. Since the Housing Element would not otherwise affect the structural integrity of the Stevens Creek Dam's structure or substantially add to the risk of dam failure, no impact is expected to occur.

j) Less than Significant Impact. Los Altos is located 5 to 6 miles from the Bay with an elevation of 150 feet or more above sea level. Consequently, potential hazards associated with water waves are not likely. Earthquake preparedness is one of the best methods to minimize personal injury and property damage and accelerate recovery. According to the General Plan, the City promotes earthquake preparedness in the community through its Emergency Preparedness Plan and mock exercises coordinated through the Emergency Preparedness Committee. This impact is considered to be less than significant.

IX. LAND USE AND PLANNING	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

Los Altos is a developed community with little opportunity for additional growth or major land use changes. The City is predominantly residential, with limited commercial, park, and public lands. In addition, there are institutional uses such as elementary schools, parks, and other public entities.

Discussion/Conclusion:

a-b) No Impact. The Housing Element is consistent with the land uses envisioned in the General Plan and would not remove policies that currently protect environmental resources. The Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels. The proposed Housing Element does not include any specific development proposals, nor does it grant any entitlements for development. The Housing Element anticipates land uses that are consistent with the land use designations established by the General Plan Land Use Element. Future residential development projects will require compliance with General Plan policies related to land use and Zoning Ordinance requirements associated with zoning districts, allowable uses, and development standards. While the Housing Element does propose changes land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including the General Plan and Municipal Code. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, there would be no impacts.

c) No Impact. The City is located northeast of the Santa Clara Valley Habitat Conservation Plan. However, the City of Los Altos is not within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impact would occur.

X. MINERAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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"/>

Setting:

Mineral resources of significance found and extracted in Santa Clara County include construction aggregate deposits and, to a lesser extent, salts derived from evaporation ponds at the edge of San Francisco Bay. There are a number of mineral resource deposits in Santa Clara County which are of regional or statewide significance, as determined by state agencies. Eight are currently in operation, yet none of these are located within the City of Los Altos (County of Santa Clara, 1994).

Discussion/Conclusion:

a-b) No Impact. No significant mineral resources have been identified in Los Altos, nor does it contain any mineral extraction activities. The City is not designated as containing any minerals of regional or local importance. Therefore, no impact to mineral resources would occur.

XI. NOISE	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>
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"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project 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"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

In Los Altos, the predominant source of noise is transportation-related noise from vehicle and truck traffic on the City’s road system. Residential and other noise-sensitive uses adjacent to area roadways are affected by traffic noise, especially those areas with no sound walls adjacent to the roadway. The closest major airport is located in San Jose approximately 8 miles to the east. The aircraft noise generation of this airport varies yet is minimal due to its distance from the City.

Discussion/Conclusion:

a-d) Less Than Significant Impact. The proposed Housing Element encourages the provision of a range of housing types and affordability levels. Housing is not considered a major source of noise in the City, but placing housing adjacent to major sources of noise could expose people to temporary or permanent noise levels in excess of standards established in the City General Plan. However, the Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development. Future residential

development projects will require compliance with General Plan policies and implementation programs related to noise and vibration standards (Natural Environment and Hazards Element Policies 7.1 through 7.10 and Implementation Programs NEH 21 through NEH 28). While the Housing Element does propose changes to existing land use densities and land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including the General Plan and Municipal Code. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, adverse impacts related to a temporary or permanent increase in noise levels would be less than significant.

e-f) No Impact. As discussed under **a-d)** above, the proposed Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development that would expose people to excessive noise levels from Airports or in areas with an Airport Land Use Plan . Future development projects would be subject to the General Plan regarding noise sources. Therefore, there would be no impacts.

XII. POPULATION AND HOUSING	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
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"/>
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"/>

Setting:

Los Altos is located in the northwest portion of Santa Clara County. The City of Los Altos is positioned approximately 5 miles west of the San Francisco Bay at the southern end of the peninsula. Los Altos is surrounded by Mountain View and Palo Alto to the north, Sunnyvale to the east, Cupertino to the south, and Los Altos Hills to the west. Existing land uses in the City are predominantly residential.

Los Altos has not experienced substantial population growth for several decades. Because Los Altos is nearly built out, most of the population changes that have occurred since 1970 are due largely to annexations. Changes in household composition related to age and the percentage of households with children have had a greater influence on Los Altos' population than growth from new development. The City's population gradually increased between 1970 and 1980, and peaked for a period around 1980, when the U.S. Census recorded 26,816 residents. Between 1980 and 1990, the number of residents gradually declined, to 26,599. Between 1990 and 2000, the City's population has increased around 4.5 percent, less than half the growth rate (12.4 percent) for Santa Clara County overall. According to the 2000 U.S. Census, the City's population was 27,693. Current projections estimate the population of Los Altos to be 28,458 (DOF, 2009). Forecasts for 2013 and 2020 predict that Los Altos will continue to experience some growth. The City's population is projected to grow by over 4 percent between 2008 and 2020, while Santa Clara County is expected to see a 16.5 percent increase in population during the same period (City of Los Altos, 2009).

Discussion/Conclusion:

a) *Less Than Significant Impact.* The proposed Housing Element contains goals intended to encourage housing to meet the City's affordable housing needs and would therefore accommodate growth rather than induce it. Furthermore, the proposed Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels. It does not include any specific development proposals, nor does it grant any entitlements for development that would induce population growth. While the Housing Element does propose changes to land use regulations, it does not involve the construction or expansion

of any residential land uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including the General Plan and Municipal Code. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, growth-inducing impacts would be less than significant.

b-c) No Impact. The proposed Housing Element encourages the provision and preservation of a range of housing types and affordability levels to meet the City's housing needs. Implementation of the Housing Element would not displace or decrease housing units in the City. Therefore, no impact would occur.

XIII. PUBLIC SERVICES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

Fire protection and emergency service to the City is provided by the Santa Clara County Fire Department (SCCFD). The City contracts with SCCFD for fire protection services within the City boundaries. SCCFD participates in a mutual aid program with the cities of Gilroy, Milpitas, Mountain View, Palo Alto, and San José. Moffett Field also participates in the mutual aid program. Through this program, should the City of Los Altos need assistance in addition to its own units, one or more of the mutual aid cities would provide assistance to locations within the City of Los Altos in whatever capacity needed. The Los Altos fire stations are located at 10 Almond Avenue and 765 Fremont Avenue. Services provided by the Fire Department include fire prevention, emergency medical services, hazardous materials containment, and fire investigations.

Police protection services are provided by the City of Los Altos Police Department. Officers patrolling the City are dispatched from police headquarters, located at One North San Antonio Road. The Los Altos Police Department is authorized for 30 sworn officers, 6 communications officers, and a non-sworn staff of 6 persons. The Police Department participates on the City's Emergency Preparedness Committee and the Traffic Advisory Task Force.

The City of Los Altos is served by a total of six public school districts serving elementary, middle, and high school students. There is also a Los Altos Campus of Golden Gate University and several private schools serving Los Altos residents.

Park and recreation services in the City are discussed under the Recreation section below.

Discussion/Conclusion:

a-e) Less than Significant Impact. The proposed Housing Element includes policies and implementation programs designed to facilitate the construction and conservation of housing to meet the City's affordable housing needs. Subsequent residential development projects could result in an increase in demand for public services. However, the Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development. While the Housing Element does propose changes to land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including the General Plan and Municipal Code. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, impacts associated with an increased demand for public services would be less than significant.

XIV. RECREATION	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>

Setting:

Los Altos offers an array of services and maintains a variety of community facilities for its residents. In addition to City park facilities, community services are provided at the Hillview Community Center, Los Altos and Woodland libraries, Los Altos History Museum, Bus Barn Theater, Redwood Grove Nature Preserve, Los Altos Youth Center, Garden House, and several school sites throughout the City.

Activities and programs offered through the Los Altos Recreation Department include art and dance classes, cooking classes, fitness programs, music classes, theater, outdoor activities and camps, and youth and adult sport leagues and programs. Special programs and services are also provided with a focus on teens, seniors, and day care for preschool and school-age children.

Discussion/Conclusion:

a-b) Less Than Significant Impact. Future residential development consistent with the 2009 Housing Element could increase the use of existing neighborhood and regional parks or other recreational facilities and require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. However, the proposed Housing Element is a policy-level document. While it encourages the provision of a range of housing types and affordability levels, it does not include any specific development proposals, nor does it grant any entitlements for development that would result in an increase demand for park and recreational facilities. Since there are no specific proposed residential developments, the demand and requirements for specific parkland acreages, park facilities, financing, and timing associated with the proposed Housing Element cannot be established at this time.

While the Housing Element does propose changes to land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including the General Plan and Municipal Code. For instance, Open Space, Conservation, and Community Facilities Element Policy 1.4 requires park dedication, public open space, or requires fees in lieu thereof, for all new subdivisions and multi-family residential development in Los Altos. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, impacts to park and recreation facilities and services would be less than significant.

XV. TRANSPORTATION/TRAFFIC	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard 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"/>
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"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

Los Altos is currently served by a well-established circulation system. The City is located immediately adjacent to the regional facilities of Interstate 280 and State Route (SR) 85 and is served by two subregional facilities: Foothill Expressway and El Camino Real (SR 82).

Pedestrian and bicycle facilities are concentrated on the major streets with some off-street paths to provide intra-City travel. Most local streets do not include sidewalks. Established bus transit service also provides travel opportunities for community residents and employees and provides links to Caltrain passenger rail and Santa Clara Valley Transportation Authority light rail service. The closest major airport is located in San Jose approximately 8 miles to the east.

Discussion/Conclusion:

a-b) Less Than Significant Impact. The proposed Housing Element includes policies and programs designed to facilitate the construction and conservation of housing to meet the City's affordable housing needs. Subsequent residential development projects could result in an increase in traffic on City roadways and a decrease in level of service (LOS) on those roadways. However, the Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development. While the Housing Element does propose changes to land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including the General Plan and Municipal Code. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, impacts associated with an increased demand for transportation facilities would be less than significant.

c) No Impact. There are no public or private airports or airstrips located within the City. Therefore, no impact would occur relative to an increase in air traffic.

d-f) Less Than Significant Impact. As discussed under **a-b)** above, the proposed Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development that would affect the site design, emergency access, or parking of any developments. Future residential development projects will require compliance with General Plan policies related to traffic and circulation. Therefore, impacts would be less than significant.

g) Less Than Significant Impact. As discussed under **a-b)** above, the proposed Housing Element does not include any specific development proposals, nor does it grant any entitlements for development. Future residential development would be required to comply with General Plan policies related to alternative transportation (Circulation Element Policy 2.6). Therefore, the proposed Housing Element would not conflict with any local policies or ordinances supporting alternative transportation.

XVI. UTILITIES AND SERVICE SYSTEMS	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
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"/>
c) Require or result in the construction of new storm water 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"/>
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"/>
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"/>
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"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

With the exception of a few homes with septic systems, the City's sewer system serves all development within Los Altos. Since 1972, the City has contracted with the City of Palo Alto for sewage treatment at the Palo Alto Regional Water Quality Control Plant. The City's contract is for 3.6 million gallons a day (mgd) of treatment, which according to the General Plan will accommodate future development of vacant sites and the intensification of commercial areas in accordance with the Land Use Element.

The typical design life of a wastewater facility is 50 years. The Palo Alto Regional Water Quality Control Plant was designed in 1969 to serve the wastewater management needs of Palo Alto, Los Altos, Mountain View, East Palo Alto, Los Altos Hills, and Stanford through the year 2020.

While the existing plant serves Los Altos for the life of the 2009 Housing Element, the plant is now being planned for a future beyond that period. The City will participate in that plan as a stakeholder.

All domestic and commercial water in Los Altos is supplied by the California Water Service Company and financially supported by user fees. Currently, 28 percent of the City's water comes from well water and 72 percent comes from Santa Clara Valley Water District sources, which include underground aquifers, reservoirs, and the San Joaquin-Sacramento River Delta.

There are no existing or planned solid waste facilities within the Los Altos Planning Area. Rather, the Los Altos waste stream is collected by a franchised hauler, the Los Altos Garbage Company, and transferred to Newby Island Landfill in San Jose.

a-b); d-e) Less than Significant Impact. Future residential development in the City would require adequate municipal wastewater service and adequate domestic municipal water service, including adequate water supplies and wastewater treatment capacity. Increases in demand for wastewater and water service can also result in exceedance of wastewater treatment requirements and the need for new water or wastewater treatment facilities or expansion of existing facilities. The proposed Housing Element includes policies designed to facilitate the construction and conservation of housing to meet the City's affordable housing needs. However, the Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development. While the Housing Element does propose changes to land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including the General Plan and Municipal Code. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal.

Therefore, impacts associated with a significant increase in demand for wastewater and water services would be less than significant.

c) Less than Significant Impact. The future development of housing consistent with the 2009 Housing Element could increase runoff and alter normal drainage patterns on project sites. As discussed under **a-b); d-e)** above, the Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development. Any future residential development in the City would be subject to further CEQA review. Therefore, impacts associated with the construction of new stormwater drainage facilities or the expansion of existing facilities is considered less than significant.

f-g) Less than Significant Impact. As discussed under **a-b); d-e)** above, the proposed Housing Element includes policies and programs designed to facilitate the construction and conservation of housing to meet the City's affordable housing needs but does not include any specific development proposals, nor does it grant any entitlements for development. Any future residential development would increase the demand for solid waste services in the area and would increase the amount of solid waste generated and sent to local landfills. Solid waste collection and disposal for single-family and multi-family residential units would be serviced by a private hauler, currently the Los Altos Garbage Company. The landfill serving the City (Newby Island Landfill in San Jose) has permitted capacity to serve future development consistent with the General Plan. At current rates of filling, Newby Island has approximately 14 years of site life (Allied Waste Services, 2009) remaining. Assembly Bill 939 and the County Integrated Waste Management Plan, which require recycling programs that result in a 50 percent diversion away

from landfills, would apply to new development. Therefore, solid waste impacts would be less than significant.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE

NOTE: If there are significant environmental impacts which cannot be mitigated and no feasible project alternatives are available, then complete the mandatory findings of significance and attach to this initial study as an appendix. This is the first step for starting the environmental impact report (EIR) process.

Does the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion:

a) and c) Less Than Significant Impact. The Housing Element is a policy-level document. While the Housing Element encourages the provision of a range of housing types and affordability levels, it does not include specific development proposals, nor does it grant any entitlements for development that would have the potential to degrade the quality of the environment to adversely affect human beings. While the Housing Element does propose changes to land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the City would be required to be in accordance with local regulations, including the General Plan and Municipal Code. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Future residential development projects would require compliance with General Plan policies and other City codes and ordinances intended to protect the environment. Therefore, the proposed Housing Element would result in less than significant adverse impacts to the environment or to human beings as a result of environmental degradation.

b) Less Than Significant Impact. As discussed above, the proposed Housing Element is a policy-level document that does not propose any specific development. Therefore, identifying or analyzing cumulative impacts would be speculative at this time. Future residential development projects and/or policies would be subject to environmental review, including a review of cumulative impacts. Therefore, impacts would be less than significant.

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