# **ATTACHMENT 3**

# CITY OF LOS ALTOS CLIMATE ACTION AND ADAPTATION PLAN INITIAL STUDY

Administrative Draft 1

**City of Los Altos** 

February 2022



# **ATTACHMENT 3**

# TABLE OF CONTENTS

I.	PROJ	IECT DESCRIPTION1
II.	ENVI	RONMENTAL FACTORS POTENTIALLY AFFECTED8
III.	ENVI	RONMENTAL CHECKLIST 11
	I.	Aesthetics 11
	II.	Agricultural and Forest Resources12
	III.	Air Quality13
	IV.	Biological Resources15
	V.	Cultural Resources 17
	VI.	Energy
	VII.	Geology and Soils19
	VIII.	Greenhouse Gas Emissions
	IX.	Hazards and Hazardous Materials23
	Х.	Hydrology and Water Quality24
	XI.	Land Use and Planning 27
	XII.	Mineral Resources
	XIII.	Noise
	XIV.	Parks and Recreation29
	XV.	Population and Housing
	XVI.	Public Services
	XVII.	Transportation
	XVIII.	Tribal Cultural Resources
	XIX.	Utilities and Service Systems
	XX.	Wildfire
	XXI.	Mandatory Findings of Significance
IV.	LIST	OF PREPARERS

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# I. PROJECT DESCRIPTION

#### 1. Introduction and Purpose

This Initial Study of environmental impacts is being prepared to conform to the requirements of the California Environmental Quality Act (CEQA), the CEQA Guidelines (California Code of Regulations 15000 et seq.), and the regulations and policies of the City of Los Altos. This initial Study evaluates potential environmental impacts that might reasonably be anticipated to result from adoption and implementation of the proposed Climate Action and Adaptation Plan

2. Project Title: Los Altos Climate Action and Adaptation Plan

- Lead Agency Name and Address: City of Los Altos Planning Division

   N San Antonio Rd Los Altos, CA 94022
- Contact Person and Phone Number: Laura Simpson, Sustainability Coordinator (926) 367-5975
- 5. Project Location:

Citywide

# Project Sponsor's Name and Address: City of Los Altos Planning Division N San Antonio Rd Los Altos, CA 94022

- **7.** General Plan and Zoning Designations: All—The project applies citywide to every General Plan designation and zoning district.
- 8. Description of Project:

#### PURPOSE

The City of Los Altos is developing a Climate Action and Adaptation Plan (CAAP) which will include an update to the greenhouse gas inventory and evaluate its sources of impact in order to determine implementation actions to reduce emissions.

In 2013, Los Altos' first Climate Action Plan was released, calling for 15% reduction in GHG emissions by 2020 as compared to 2005 levels. This update to the City's Climate Action Plan includes an adaptation section to prepare for the local impacts of climate change and represents the next step in the journey towards a sustainable, healthy, equitable future. The update provides a pathway to the City's bolder GHG reduction target as well as a framework for a climate resilient community.

# LOCATION

Los Altos is located in the San Francisco Bay Area, in Santa Clara County. As shown in Figure 1, Los Altos is situated in the northern portion of Santa Clara County, along the San Francisco Bay Peninsula. The city is bordered by Los Altos Hills to the west, Palo Alto to the north, Mountain View and Sunnyvale to the east, and Cupertino to the south.

# **PROJECT DESCRIPTION**

The City's 2013 Climate Action Plan was designed to serve as a guiding document towards GHG reductions, both in municipal operations and community wide. It was designed as a comprehensive strategy to reduce emissions in a manner consistent with state guidelines and regulations, and to identify cost-effective opportunities for existing and future residents, businesses, and development projects for a more sustainable community. At the same time, the CAP provided a framework for the environmental leadership and an educational resource to the community. The CAP update provides a pathway to the City's bolder GHG reduction target, as well as a framework for a climate resilient community.

The goals of the CAAP are:

- Reduced greenhouse gas (GHG) emissions
- Increase climate resilience (SB 379 compliance)
- Demonstrate leadership

This Initial Study specifically evaluates the local measures proposed to reduce emissions in Los Altos. The proposed CAAP addresses eight (8) focus areas, as identified below.

- Transportation—Reduce Single-Occupancy Vehicle Travel, Electrify Transportation
- **Energy**—Reduce Energy Consumption, Facilitate Building Decarbonization, Increase Solar Energy and Battery Storage
- **Resource Conservation**—Reduce Consumption and Waste
- Municipal Operations—Operate Sustainable Municipal Buildings, Reduce Municipal VMT, Promote Green Municipal Practices, Integrate Climate Action and Adaptation into City Functions,

- Green Community—Develop Nature-Based Solutions
- Climate Risk—Understand and Reduce Physical Risk
- **Emergency Preparedness**—Integrate Adaptation into Emergency Preparedness and Response
- **Resilient Community**—Educate and Protect Residents

Each focus area proposes specific measures and actions the City will take to reduce GHG emissions in Los Altos. Table 1 identifies the proposed measures and actions to be included in the CAP.

#### Table 1: Proposed Climate Action and Adaptation Plan Measures and Actions

Focus Area 1: Transportation			
1.1	Create a Walkable and Bikeable City		
A	Fully implement the 2021 Complete Streets Master Plan by 2035 and make		
	adjustments as needed to comply with VMT reduction objectives		
В	Create a pedestrian-friendly Downtown and other community and commercial		
	spaces throughout the city		
С	Develop a new Parking Management Strategy that supports strategic VMT reduction		
1.2	Promote Smart Growth Strategies		
А	Support Transit-Oriented Development		
В	Encourage Live Near Work incentives		
С	Promote Work From Home policies and infrastructure		
1.3	Support Shared Mobility		
А	Develop an electric shuttle program and shared bike, ebike and scooter programs as		
	alternatives to SOV travel		
В	Expand transit service and transit stop amenities		
С	Partner with adjacent cities to improve first/last mile options		
D	Require commercial Transportation Demand Management programs		
E	Work with Los Altos School Districts to reduce VMT		
F	Develop and promote community carshare and carpool programs		
1.4	Accelerate Electric Vehicle Adoption		
А	Increase education & awareness of available EV resources and incentive programs		
В	Actively promote EV adoption and require EV parking		
1.5	Install Community-Wide Electric Vehicle Supply Equipment		
А	Increase the number of available Level 2 EV charging stations in commercial and		
	multifamily areas		
В	Create a citywide network of DC Fast Charging (DCFC) stations		
C	Double the current Electric Vehicle charging and pre-wiring requirements in future		
	Reach Code updates		

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D	Identify grants and incentives to install EV charging including DCFC, solar EV					
	charging, and paired EV charging + battery storage systems					
Focus Area 2: Energy						
2.1 Fund or Support Energy Efficiency Incentive Programs						
А	Perform residential and commercial energy audits					
В	Increase residential energy efficiency					
2.2	Require All-Electric New Buildings and Major Retrofits					
Α	Adopt bold Reach Codes and expand to include large additions, ADUs and major					
	remodels					
2.3	Increase Fuel Switching in Existing Buildings					
А	Increase residential fuel switching					
В	Increase commercial fuel switching					
2.4	Disincentivize Methane Gas					
Α	Consider a fee on the use of methane gas					
2.5	Eliminate Off-Road Fossil Fuel Engines					
А	Phase out off-road fossil fuel engines such as landscaping equipment					
2.6	Work Towards Development of Net Zero Buildings					
А	Increase community solar					
В	Increase community solar + storage					
	Topic 3: Resource Conservation					
3.1	Continue to Decrease Waste					
Α	Increase the landfill diversion rate					
В	Work to eliminate single-use plastics					
C	Reduce waste from construction and building materials					
3.2	Conserve Water					
A	Increase water efficiency in buildings and landscapes					
3.3	Promote a Circular Economy					
A	Promote sustainable food choices					
В	Increase knowledge of responsible goods & services consumption					
	Topic 4: Municipal Operations					
4.1	Increase Building Efficiency					
A	Audit appropriate City facilities and conduct comprehensive energy efficiency					
	upgrades					
4.2	Explore Solar + Storage at City facilities					
A	Build new City buildings to Net Zero standards					
В	Include options for battery storage and explore feasibility of developing a microgrid					
	for savings and resilience					
4.3	Convert the City's Fleet to Electric Vehicles					
А	Develop a phase-out schedule to replace all City-owned fleet vehicles with electric					
	versions					

4.4	Encourage Sustainable Employee Commute and Business Travel
А	Improve City staff use of commute alternatives to single-occupant vehicles
В	Develop Work From Home and flexible schedule policies
4.5	Expand Responsible Procurement
А	Adopt a zero-waste policy for City facilities and City-sponsored events.
4.6	Incorporate Climate Action and Adaptation into City Policy, Budget, Planning, &
	Internal Standards
А	Account for climate change in all new City projects
В	Incorporate climate preparedness into City programs, operations, and maintenance
	protocols
С	Integrate CAAP goals into the budget process
	Topic 5: Green Community
5.1	Expand Green Infrastructure & Improve Water Resilience
А	Update building code to incentivize rainwater harvesting and greywater recycling;
	install systems at municipal facilities
В	Create water-efficient buildings and landscapes - Expand green infrastructure
	program to reduce overall surface area of and capture runoff from paved areas
	(streets, parking lots, driveways)
С	Determine feasibility of using recycled water from Regional Water Quality Control
	Plant
5.2	Explore Carbon Sequestration Opportunities and Expand Natural Environments
А	Increase urban tree canopy
В	Expand parks and natural wooded spaces
C	Explore carbon farming opportunities
	Topic 6: Climate Risk
6.1	Reduce Flood Risk
А	Conduct updated flood risk study with capital and policy recommendations
В	Develop and implement comprehensive riparian ecosystem restoration plan and
	relevant floodplain management policies
C	Expand green infrastructure program to reduce overall surface area of and capture
	runoff from paved areas (streets, parking lots, driveways)
D	Develop "Ready to Go" automatic property buyout program to demolish buildings
	damaged in future floods
6.2	Reduce Heat Risk
А	Conduct heat study/mapping to identify areas of Urban Heat Island
В	Enact reflectivity standards for asphalt and ground level surfaces; enact
	reflectivity/green roof standards for roofs
C	Promote alternative building cooling strategies
	Topic 7: Emergency Preparedness
7.1	Ensure Safety During Extreme Heat

A	Develop citywide heat management plan				
В	Determine feasibility of implementing a Los Altos-specific early warning system for				
	heat health				
C	Develop temperature/heat safety protocols for outdoor workers - educate and				
	enforce				
D	Adjust/extend park and public facility hours during heat waves				
E	Expand public drinking fountains/refillable water stations				
7.2	Ensure Safety During Unhealthy Air Events				
А	Determine feasibility of an early warning system for air quality				
В	Purchase and distribute N-95 masks to vulnerable populations to filter air pollution				
	Topic 8: Resilient Community				
8.1	Establish Resilience Hubs				
A	Determine emergency preparedness of all facilities serving vulnerable populations				
	and feasibility for making them climate resilient for existing population and the public				
В	Identify, fund, and prepare existing and new public facilities to serve as resilience				
	hubs				
8.2	Identify and Protect Vulnerable Community Members				
A	Plan outreach for and educate vulnerable populations (e.g., isolated seniors, outdoor				
	workers, long-term care residents) and the people and institutions that care for them				
8.3	Improve Climate Literacy & Risk Understanding				
A	Enact requirement for flood hazard risk disclosure in property sales/during real estate				
	process				
В	Update Community Emergency Response Training (CERT) to include growing climate				
	hazards				
C	Launch a Community Climate Action Grant				

# 9. Potential Physical Changes

The CAAP does not propose any structures, land uses, or other features (e.g., freeways, railroad tracks) that would physically change the existing community. Rather, the CAAP includes strategies and measures to improve connectivity within Los Altos and to promote alternative transportation methods.

# 10. Other Public Agencies Whose Approval is Required:

The City of Los Altos has sole approval authority over the CAP Update. There are no other public agencies whose approval is required.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section



# 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

No California Native American tribes traditionally and culturally affiliated with the project area have requested consultation pursuant to Public Resources Code section 21080.3.1. The CAAP does not propose any structures, land uses, or other features (e.g., freeways, railroad tracks) that would physically change the existing community.

# II. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

Mineral Resources

Parks and Recreation

**Tribal Cultural Resources** 

Utilities/Service Systems

Mandatory Findings of Significance

Population/Housing

Public Services

**T**ransportation

Noise

□ Wildfire

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology/Soils
- **Greenhouse Gas Emissions**
- □ Hazards and Hazardous Materials
- □ Hydrology/Water Quality
- □ Land Use/Planning

#### **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 CATEGORICAL EXEMPTION will be prepared.
- □ 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.

Signature

Date

LOS ALTOS CAP UPDATE INITIAL STUDY II. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

# III. ENVIRONMENTAL CHECKLIST

# I. AESTHETICS

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				$\boxtimes$
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				$\boxtimes$
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in ar urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?)				
<ul> <li>d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</li> </ul>				$\boxtimes$

#### **Aesthetics Discussion**

a) Have a substantial adverse effect on a scenic vista?

Proposed CAAP measures and actions encourage the use of energy-efficient and green building design features, which may include cool roofs or photovoltaic systems. Building permits required to comply with the City's Green Building Ordinance are subject to a design review process required by the ordinance to ensure there are no adverse effects on scenic vistas. Therefore, **no impact would result**.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?

There are no state scenic highways located in Los Altos. Therefore, no impact would result.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?)

Refer to (a) above. No impact would result.

Loce Than

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Implementation of the CAAP may include the use of photovoltaic panels or replacement of outdoor lighting fixtures on residential or commercial structures throughout the city. Solar panels do not reflect light, are not visible at night, and would not create a new source of substantial glare. New or replacement lighting fixtures are subject to review under the City's community design guidelines to minimize effects of day or nighttime views. **No impacts would result**.

# II. AGRICULTURAL AND FOREST RESOURCES

	Less Than Significant					
	Potentially Significant Impact	with Mitigation Incorporated	Less Than Significant Impact	No Impact		
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. In determining whether impacts to forest resources, including timberland, are significantly environmental effects, lead agencies may refer to information compiled by the California department of forestry and fire protection regarding the state's inventory of forest land, including the forest and range assessment project and the forest legacy assessment project; and forest carbon measurement methodology provided in forest protocols adopted by the California air resources board. Would the project:						
<ul> <li>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 a non-agricultural use?</li> </ul>				$\boxtimes$		
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				$\boxtimes$		
<ul> <li>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Governmental Code Section 51104(g))?</li> </ul>				$\boxtimes$		
<ul> <li>d) Result in the loss of forest land or conversion of forest land to non-forest use?</li> </ul>				$\boxtimes$		
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?				$\boxtimes$		

#### Agricultural and Forest Resources Discussion

- 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 a non-agricultural use?
- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?
- d) Result in the loss of forest land or conversion of forest land to non-forest use?
- e) Involve other changes in the existing environment which, due to their location or mature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The CAAP is a policy document that provides strategies to reduce GHG emissions in the city. No conversion of farmland is proposed. Additionally, the CAAP promotes the creation of additional urban open spaces within the city that could be used as recreational or community garden space. There is no land zoned for agricultural use or with active Williamson Act<sup>1</sup> contracts located in Los Altos. **No impact would result.** 

# III. AIR QUALITY

·	Potentially	Less Than Significant with	Less Than	Na
	Significant Impact	Mitigation Incorporated	Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?				$\boxtimes$
b) 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?				$\boxtimes$
c) Expose sensitive receptors to substantial pollutant concen- trations?				$\boxtimes$
<ul> <li>Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</li> </ul>				$\boxtimes$

<sup>&</sup>lt;sup>1</sup> "Williamson Act and Open Space Easement." County of Santa Clara Department of Planning and Development, https://plandev.sccgov.org/policies-programs/williamson-act-and-open-space-easement.

#### a) Conflict with or obstruct implementation of the applicable air quality plan?

The City is located in the San Francisco Bay Area Air Basin (SFBAAB) and is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). In accordance with the California Clean Air Act, the BAAQMD is required to prepare and update an air quality plan that outlines measures by which both stationary and mobile sources of pollutants can be controlled to achieve federal and state air quality standards in areas designated as nonattainment. The SFBAAB is designated as a nonattainment area for the California standards for ozone, respirable particulate matter (PM10), and fine particulate matter (PM2.5), and for the federal standard for ozone and PM2.5. The SFBAAB is designated an attainment or unclassified area for all other pollutants.<sup>2</sup>

In April 2017, the BAAQMD adopted the 2017 Clean Air Plan: Spare the Air, Cool the Climate,<sup>3</sup> which includes 85 control measures to reduce ozone precursors, particulate matter, toxic air contaminants, and GHGs. Although the purpose and intended effect of the CAAP is to reduce GHG emissions generated in the City to help reduce the effects of climate change, many of its actions would also reduce air pollutant emissions. For example, proposed CAAP actions 1.1 through 1.5, 4.3, and 4.4 promote alternative modes of transportation, support the use of alternatively fueled vehicles (e.g., electric), and encourage land use planning practices that directly reduce vehicle trips and vehicle miles traveled (VMT), which reduces fossil fuel use and associated air pollutant emissions. Thus, the CAAP is consistent with the 2017 Clean Air Plan and would have no impact related to a conflict with or obstruction of the applicable air quality plan. **No impact would result.** 

b) 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?

As described above, the SFBAAB is designated as a nonattainment area for ozone, PM10, and PM2.5. The CAAP does not propose new development projects or changes to land use and zoning. Thus, implementation of the CAAP would not directly result in construction or operational impacts related to an increase of criteria air pollutants. Some of the proposed CAAP measures, such as increased solar panel and EV infrastructure requirements, could indirectly result in an increase in construction activities for future developments; however, emissions from these additional construction activities would likely be negligible compared to the overall construction activities. Discretionary developments would also be required to undergo CEQA review. Furthermore, many of the GHG reduction measures proposed in the CAAP would also reduce criteria air pollutants. **Therefore, no impact would result**.

c) Expose sensitive receptors to substantial pollutant concentrations?

<sup>&</sup>lt;sup>2</sup> Bay Area Air Quality Management District (BAAQMD), 2017. Air Quality Standards and Attainment Status. Available at: http://www.baaqmd.gov/research-and-data/air-quality-standards-and-attainment-status, accessed February 16, 2022. Last updated January 5, 2017.

<sup>&</sup>lt;sup>3</sup> Bay Area Air Quality Management District (BAAQMD), 2017. 2017 Clean Air Plan: Spare the Air, Cool the Climate. April 19.

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The term "sensitive receptor" refers to a location where individuals are more susceptible to poor air quality. The CAAP does not propose new development projects or changes to land use and zoning that would increase air pollutant emissions in the City. Thus, implementation of the CAAP would not generate air pollutant emissions that would result in the exposure of sensitive receptors to substantial pollutant concentrations. **No impact would result**.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

As described above, the CAAP does not propose new development projects or changes to land use and zoning. Thus, implementation of the CAAP would not generate emissions, such as odors, which would adversely affect a substantial number of people. **No impact would result.** 

# IV. BIOLOGICAL RESOURCES

		Less Than					
		Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact		
Wo	uld 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 Cali- fornia Department of Fish and Game or U.S. Fish and Wildlife Service?				$\boxtimes$		
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?				$\boxtimes$		
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				$\boxtimes$		
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corri- dors, or impede the use of native wildlife nursery sites?				$\boxtimes$		
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				$\boxtimes$		
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?				$\boxtimes$		

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?

Special status plants include those listed as "Endangered," "Threatened," or "Candidate for Listing" by the California Department of Fish and Wildlife (CDFW) or the US Fish and Wildlife Service (USFWS), are included in the California Rare Plant Rank, or are considered special status in local or regional plans, policies, or regulations. Special-status animals include those listed as "Endangered," "threatened," or "Candidate for Listing" by the CDFW or the USFWS, are designated as "Watch List," "Species of Special Concern," or "Fully Protected" by the CDFW, or are considered "Birds of Conservation Concern" by the USFWS. While there are occurrences of plant and animal species with special status in Los Altos, the CAAP measures do not propose new development that would interfere with any riparian habitats or sensitive natural communities. **Therefore, no impact would result.** 

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?

The physical environmental changes that could occur as a result of implementation of the proposed CAAP measures would take place within the built environment or as part of a planned City-approved project. Where solar PV panels are installed on existing buildings or structures, no impact on riparian habitat and sensitive natural communities would occur. Where solar PV panels are installed as part of a new development project, the project would, if necessary, be required to undergo separate environmental review prior to approval of any development with the potential to degrade the habitat of any threatened or endangered species. If new projects are proposed in areas where sensitive natural communities, such as riparian habitat, freshwater marsh, or native grasslands occur, mandatory compliance with local, state, and federal regulations would be required. **Therefore, no impact would result**.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Wetlands and other waters are protected under the federal Clean Water Act and the state's Porter-Cologne Water Quality Control Act and are under the jurisdiction of the US Army Corps of Engineers and the San Francisco Bay Regional Water Quality Control Board. Federal and state regulations require avoidance of impacts to the extent feasible, and compensation for unavoidable losses of jurisdictional wetlands and waters. Implementation of proposed CAAP measures would occur within the built environment or as part of a planned City-approved project, which, if necessary, would undergo separate environmental review. If new projects are proposed in areas of freshwater marsh, seasonal wetlands, or emergent marsh or other wetlands on or adjacent to the site, mandatory compliance with local, state, and federal regulations would be required. **Therefore, no impact would result**. 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?

The spatial arrangement of habitat and barriers affects the location, movement patterns, foraging dynamics, and persistence of plant and animal species. The extent of urbanization in the city and adjacent communities restricts opportunities for movement and dispersal of native wildlife and plant species. Common urban features such as roadways, rail lines, fencing, buildings, and hardscape represent barriers to wildlife movement and dispersal. The best opportunities for animal and fish movement exist along the riparian corridors in the city. In addition, existing mature trees provide nesting opportunities for migratory birds. The proposed CAAP would not affect the number or location of these mature trees. Therefore, as wildlife movement corridors in the city are limited and mature trees would not be affected, **no impact would result**.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

All structures, programs, and projects to be completed under the proposed CAP would be subject to the oversight and review processes envisioned by the General Plan and established in the Municipal Code, including those protecting biological resources. Additionally, the General Plan and Municipal Code are consistent with all other local policies or ordinances protecting biological resources. Therefore, implementation of the proposed CAAP would have no conflict with **and no impact on any local policies or ordinances protecting biological resources**.

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?

Los Altos is not located within the study area of the Santa Clara Valley Habitat Conservation Plan or any other identified habitat conservation plans. Therefore, **no impact would result**.

# V. CULTURAL RESOURCES

Wo	uld the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				$\boxtimes$
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?				$\boxtimes$
c)	Disturb any human remains, including those interred out- side of formal cemeteries?				$\boxtimes$

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Multiple measures in the CAAP call for the installation of solar photovoltaic panel projects on residential and nonresidential structures and on City-owned facilities. Implementation of these proposed CAAP measures would occur within the built environment or as part of a separate City-approved project, which if necessary, would be subject to separate environmental review pursuant to CEQA. Therefore, while certain facilities or equipment installed pursuant to the proposed CAAP could potentially affect cultural and archaeological resources, all structures, programs, and projects completed under the proposed CAP would be subject to the oversight and review processes established in the Municipal Code, including those related to historical, archeological, and paleontological resources and human remains. Additionally, projects carried out under the proposed CAAP would be obligated to cease construction or other activities and report any discovery of potentially significant cultural or anthropological resources in compliance with state law (Section 7050.5 of the Health and Safety Code and Section 5097.94 of the Public Resources Code). Accordingly, such discoveries would be subject to the jurisdiction of anthropological or tribal experts, who would be responsible for inspection and potential relocation of discovered cultural resources. **No impact would result.** 

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Refer to (a) above. No impact would result.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Refer to (a) above. No impact would result.

# VI. ENERGY

Wo	ould the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				$\boxtimes$
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			$\boxtimes$	$\boxtimes$

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The CAAP does not propose new development projects or changes to land use and zoning. Thus, implementation of the CAAP would not result in construction or operational impacts related to wasteful consumption of energy resources. The CAAP is a policy document containing climate action measures to reduce Citywide GHG emissions, including those emissions generated by energy demand and supply. For example, actions 1.1 through 1.5, 4.3, and 4.4 promote alternative modes of transportation, support the use of alternatively fueled vehicles (e.g., electric), and encourage land use planning practices that directly reduce vehicle trips and VMT, which reduces fossil fuel use. Actions 2.1 through 2.6, 4.1, and 4.2 promote energy efficiency in residential, commercial, and municipal buildings, as well as increased use of renewable energy. Thus, the CAAP would not result in wasteful, inefficient, or unnecessary consumption of energy resources. **No impact would result**.

#### b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The CAAP would support (and not conflict with) the requirements of the California State Green Building Code (CALGreen) and Title 24 Building Energy Efficiency Standards, which ensure that future projects operate in an energy efficient manner. Furthermore, action 2.2 of the CAAP requires new buildings and major retrofits to be all-electric by adopting codes that go beyond the Title 24 standards. **Therefore, no impact would result.** 

			Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
		he project:				
a)		ectly or indirectly cause potential substantial adverse ects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on				$\boxtimes$
		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.				$\boxtimes$
	ii.	Strong seismic ground shaking?				$\boxtimes$
	iii.	Seismic-related ground failure, including liquefaction?				$\boxtimes$
	iv.	Landslides?				$\boxtimes$
b)	Res	ult in substantial soil erosion or the loss of topsoil?				$\boxtimes$
c)	wo pot	located on a geologic unit or soil that is unstable, or that uld become unstable as a result of the project, and entially result in on- or off-site landslide, lateral eading, subsidence, liquefaction, or collapse?				$\boxtimes$

# VII. GEOLOGY AND SOILS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				$\boxtimes$
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?				$\boxtimes$
f)	Directly or indirectly destroy a unique paleontological resource or unique geologic feature?				$\boxtimes$

- a) Directly or indirectly cause 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.
  - *ii.* Strong seismic ground shaking?
  - iii. Seismic-related ground failure, including liquefaction?
  - iv. Landslides?

The City is located within the central portion of the Coast Ranges geomorphic province, which includes numerous active faults identified by the California Geological Survey under the Alquist-Priolo Earthquake Fault Zoning Act. The City is not located within or adjacent to an Alquist-Priolo Earthquake Fault Zone; however, the City is located between the San Andreas and Hayward faults, as well as numerous smaller faults, and is susceptible to strong seismic ground shaking in the event of a major earthquake. Slopes in the southwest portion of the City are susceptible to earthquake-induced landslides and liquefaction could occur along the edges of creeks.<sup>4</sup>

The proposed CAAP measures do not direct construction of new structures where people or property would be more exposed to seismic risks. **Therefore, no impact would result.** 

b) Result in substantial soil erosion or the loss of topsoil?

The CAAP does not propose new development projects or changes to land use and zoning that would result in substantial soil erosion or loss of topsoil. Furthermore, any discretionary

<sup>&</sup>lt;sup>4</sup> California Geological Survey, 2002. Earthquake Zones of Required Investigation Cupertino Quadrangle. September 23.

developments that are required to comply with measures from the CAAP would be subject to the City's existing grading regulations specifically designed to reduce soil erosion. **Therefore, no impact would result.** 

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?

The CAAP does not propose new development projects or changes to land use and zoning. Discretionary development projects that help to achieve the CAAP goals would be subject to applicable engineering and City building code requirements specifically designed to reduce potential geological hazards and damages. **Therefore, no impact would result.** 

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Refer to (c) above. No impact would result.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Refer to (c) above. No impact would result.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The CAAP does not propose new development projects or changes to land use and zoning that would result in the destruction of unique paleontological resources or geologic features. Any discretionary developments that are required to comply with measures in the proposed CAAP (e.g., increased solar panel installations or EV parking) would be required to undergo CEQA review. **Therefore, no impact would result.** 

# VIII. GREENHOUSE GAS EMISSIONS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	ould the project:				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				$\boxtimes$
b)	Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				$\boxtimes$

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The CAAP includes an updated inventory of the City's GHG emissions, as well as a series of emissions forecasts for 2050. First a Business-As-Usual (BAU) forecast was developed to estimate the City's emissions without any additional action from federal, State, or local governments. The City's BAU emissions are expected to increase from 111,320 metric tons of carbon dioxide equivalents (MTCO2e) in 2018 to 116,346 MTCO2e in 2050. To project the City's emissions in 2050 including the expected impacts of State and local actions, an Adjusted Business-As-Usual (ABAU) forecast was developed which includes expected increases in fuel economy and building energy efficiency in California, increased EV adoption in Los Altos specifically, and the expected increase in air conditioning use due to increased temperatures related to climate change. This forecast shows that, with the inclusion of these additional factors, the City's emissions are expected to decline from 111,320 MTCO2e in 2018 to 70,800 MTCO2e in 2050.

One of the primary goals of the CAAP is to set the City on a path towards carbon neutrality by 2035. Implementation of the City's existing 2021 Reach Codes<sup>5</sup> and 2013 Climate Action Plan<sup>6</sup> actions along with State and local measures included in the ABAU scenario will reduce the City's emissions from 111,320 MTCO2e in 2018 to 67,160 MTCO2e in 2035. To achieve the carbon neutrality goal, the CAAP proposes actions and policies that aim to reduce the City's net emissions by an additional 60,000 MTCO2e by 2030 and a further 15,000 MTCO2e by 2035. As a result, implementation of the CAAP would reduce the City's emissions from 111,320 MTCO2e in 2035 and the remaining GHG emissions will be sequestered through nature-based solutions (e.g., increasing tree canopy and enhancing green spaces). Therefore, no impact would result.

*b)* Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The CAAP proposes actions and policies to switch from fossil fuel use in buildings and residences to clean renewable electrical energy, reduce VMT, electrify transportation, and increase walking, bicycling, and shared transportation. As discussed above, one of the primary goals of the CAAP is to set the City on a path towards carbon neutrality by 2035, which is more aggressive than the GHG reduction goals established in the California Air Resources Board's 2017 Scoping Plan. Transportation and land use measures in the proposed CAAP also promote implementation of the Sustainable Communities Strategy for the Bay Area (Plan Bay Area 2050) required by Senate Bill (SB) 375. Therefore, the CAAP implements rather than conflicts with state regulations and applicable plans to reduce GHG emissions. **Therefore, no impact would result.** 

<sup>&</sup>lt;sup>5</sup> On November 10, 2020, the City Council adopted Reach Code Ordinances 2020-470A, 2020-470B, 2020-470C and 2020-471 that will help the City achieve its sustainability goals moving forward.

<sup>&</sup>lt;sup>6</sup> City of Los Altos, 2013. City of Los Altos Climate Action Plan. December.

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#### IX. HAZARDS AND HAZARDOUS MATERIALS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	uld the project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				$\boxtimes$
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?				$\boxtimes$
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school?				$\boxtimes$
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?				$\boxtimes$
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				$\boxtimes$
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				$\boxtimes$
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				$\boxtimes$

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The routine transport, use, or disposal of these hazardous materials would not pose a significant hazard to the public or environment unless the hazardous materials were accidentally spilled or released into the environment. The CAAP does not propose new development projects or changes to land use and zoning that would result in an increase in the use of hazardous materials. **Therefore, no impact would result.** 

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?

The CAAP does not propose new development projects or changes to land use and zoning that would result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. **Therefore, no impact would result**.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school?

The CAAP does not propose new development projects or changes to land use and zoning that would result in the emissions of handling of hazardous materials near existing or proposed schools. **Therefore, no impact would result.** 

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?

The CAAP does not propose new development projects or changes to land use and zoning that would result in the disturbance of a hazardous materials site compiled pursuant to Government Code Section 65962.5. Any discretionary developments that are required to comply with measures in the proposed CAAP (e.g., increased solar panel installations or EV parking) would be required to undergo CEQA review. **Therefore, no impact would result.** 

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 or excessive noise for people residing or working in the project area?

The City is not located within an airport land use plan. Therefore, no impact would result.

*f*) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?* 

The City is not located in the vicinity of a private airstrip. **Therefore, no impact would result.** 

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The CAAP does not propose new development projects or changes to land use and zoning that would expose people or structures to wildland fire hazards. **Therefore, no impact would result.** 

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	uld the project:				
a)	Violate any water quality standards or waste discharge re- quirements or otherwise substantially degrade surface or groundwater quality?				$\boxtimes$

# X. HYDROLOGY AND WATER QUALITY

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				$\boxtimes$
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:				
	i) result in substantial erosion or siltation on- or off-site;				$\boxtimes$
	<ul> <li>substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;</li> </ul>				$\boxtimes$
	<ul> <li>create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or</li> </ul>				$\boxtimes$
	iv) impede or redirect flood flows?				$\boxtimes$
d)	In flood hazard, tsunami, or seiches zones, risk release of pollutants due to project inundation?				$\boxtimes$
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				$\boxtimes$

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Proposed CAAP actions 5.1b and 6.1c would expand the City's green infrastructure program to reduce the overall surface area of and capture runoff from paved areas, require water efficient landscaping, install porous paving in parking lots and driveways, and implement other water percolation methods like bioswales to reduce stormwater runoff. By reducing stormwater runoff from sites, these actions can improve water quality and reduce the generation of wastewater. Furthermore, activities pursued under the proposed CAAP would occur within the existing built environment and would be subject to the oversight, review processes, and standards envisioned by the General Plan, established in the Municipal Code, and/or otherwise required by state/federal regulations. **Therefore, no impact would result.** 

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The CAAP does not propose new development projects or changes to land use and zoning that would result in an increase of groundwater demand or interfere with groundwater recharge. Proposed CAAP actions 5.1a and 5.1c would promote rainwater harvesting and greywater recycling. As discussed above, actions 5.1b and 6.1c would expand the City's green infrastructure

program to reduce stormwater runoff from sites and increase water percolation methods. Action 6.1b would also increase percolation to the ground by restoring the riparian ecosystem of creeks and adding managed ponds and dams to slow the flow of water. **Therefore, no impact would result.** 

- 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?
  - i) result in substantial erosion or siltation on- or off-site;

*ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;* 

*iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or* 

iv) impede or redirect flood flows?

The CAAP does not propose new development projects or changes to land use and zoning that would adversely alter existing drainage patterns. As discussed above, proposed CAAP actions 5.1a, 5.1b, 5.1c, 6.1b, and 6.1c would reduce stormwater runoff and improve flow along creeks, which would reduce the potential for future developments to result in substantial erosion or flooding. Action 6.1a would require a Citywide flood risk study to support recommendations for replacement and rebuilding of undersized culverts and creek crossings. Action 6.1d would develop a "Ready to Go" automatic property buyout program to purchase vacant or developed land that experiences flooding beyond a certain threshold (e.g., more than 50% damaged) to prevent or remove property from the danger of flood hazards and to restore the floodplain to natural habitat. **Therefore, no impact would result.** 

d) In flood hazard, tsunami, or seiches zones, risk release of pollutants due to project inundation?

The City is located five to six miles from the Bay with an elevation of about 75 feet or more above sea level, and therefore is not subject to inundation by seiche or tsunami. Portions of the City adjacent to creeks are within a 100-year flood hazard zone mapped by the Federal Emergency Management. The CAAP does not propose new development projects or changes to land use and zoning that would increase the risk of pollutants being released due to flooding. As discussed above, proposed CAAP actions 5.1 through 6.1 would reduce stormwater runoff and flood risks throughout the City. **Therefore, no impact would result.** 

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The CAAP does not propose new development projects or changes to land use and zoning that would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. As discussed above, proposed CAAP actions 5.1 through 6.1

would expand green infrastructure, improve water resilience, and reduce flood risk. **Therefore**, **no impact would result**.

### XI. LAND USE AND PLANNING

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	uld the project:				
a)	Physically divide an established community?				$\boxtimes$
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				$\boxtimes$

#### a) Physically divide an established community?

The CAAP does not propose any structures, land uses, or other features (e.g., freeways, railroad tracks) that would physically divide an established community. The CAAP does not recommend any strategy or measure that would physically divide the community. Rather, the CAAP includes strategies and measures to improve connectivity within Los Altos and to promote alternative transportation methods. **Therefore, no impact would result.** 

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The CAAP proposes strategies and measures to reduce GHG emissions. Implementing the CAAP may require some modification of existing City policies, including General Plan and zoning regulations. However, proposed CAAP strategies and measures would generally result in greater avoidance or mitigation of environmental effects, as the CAAP is designed to mitigate adverse environmental impacts associated with global climate change. For these reasons, although some changes to existing City policies and plans would result from adoption of the CAAP, the intent and **impact would be beneficial**.

### XII. MINERAL RESOURCES

			Less Than Significant		
		Potentially Significant Impact	with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	buld 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?				$\boxtimes$

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				$\boxtimes$

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?

No significant mineral resources are located in the city. **Therefore, no impact would result.** 

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?

Refer to (a) above. No impact would result.

# XIII. NOISE

		Less Than Significant					
		Potentially Significant Impact	with Mitigation Incorporated	Less Than Significant Impact	No Impact		
Wo	uld the project result in:						
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				$\boxtimes$		
b)	Generation of excessive ground borne vibration or ground borne noise levels?				$\boxtimes$		
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?				$\boxtimes$		

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

The CAAP does not propose new development projects or changes to land use and zoning that would result in a substantial increase in ambient noise levels. Some of the proposed CAAP measures, such as increased solar panel and EV infrastructure requirements, could indirectly result in an increase in construction activities for future developments; however, noise from these additional construction activities would likely be negligible compared to the overall construction

activities. Discretionary developments would also be required to undergo CEQA review and comply with the City's noise ordinance and regulations designed to reduce noise from construction activities. Furthermore, proposed CAAP actions 1.1, 1.3, and 4.4 promote alternative modes of transportation and encourage land use planning practices that directly reduce vehicle trips and VMT, which reduces ambient noise levels. **Therefore, no impact would result.** 

#### b) Generation of excessive ground borne vibration or ground borne noise levels?

As discussed above, the CAAP does not propose new development projects or changes to land use and zoning. Some of the proposed CAAP measures, such as increased solar panel and EV infrastructure requirements, could indirectly result in an increase in construction activities for future developments; however, vibrations from these additional construction activities would likely be negligible compared to the overall construction activities. Discretionary developments would also be required to undergo CEQA review. **Therefore, no impact would result**.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?

The City is not located within an airport land use plan or in the vicinity of a private airstrip. **Therefore, no impact would result.** 

Wa	ould the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				$\boxtimes$
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?				$\boxtimes$

# XIV. PARKS AND RECREATION

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?

The proposed CAAP recommends fully implementing the 2021 Complete Streets Master Plan by 2035, which could indirectly increase resident use of existing and expanding bike lanes and paths. Physical deterioration of existing recreation facilities, if any, would not be considered substantial

Loss Than

and would be in part offset by the recreational benefits of new bikeways and pedestrian facilities. **Therefore, no impact would result.** 

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?

The CAAP recommends additional bicycle and pedestrian infrastructure through accelerated implementation of the 2021 Complete Streets Master Plan. Construction of new bicycle and pedestrian facilities would be subject to further CEQA analysis, General Plan policies, and engineering design standards to prevent adverse physical effects. **No impact would result.** 

# XV. POPULATION AND HOUSING

Wo	uld the project:	Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				$\boxtimes$
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				$\boxtimes$

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The CAAP does not propose any new housing units or nonresidential growth beyond levels already considered in the Los Altos General Plan. Commercial and residential energy efficiency retrofits that may occur as a result of the CAAP would take place in businesses and homes already located in Los Altos to make the more energy-efficient, subject to compliance with the City's Green Building Ordinance. **Therefore, no impact would result.** 

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Although proposed CAAP measures encourage energy-efficient retrofits for existing homes and new transit-oriented development projects, homes would not be displaced. Possible future development activities following adoption of the CAAP would likely lead to a greater mix of uses in the city and could result in more homes. Replacement housing would not be necessary. **Therefore, no impact would result.** 

# XVI. PUBLIC SERVICES

Wo	uld the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	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:				
	Fire protection?				$\boxtimes$
	Police protection?				$\boxtimes$
	Schools?				$\boxtimes$
	Parks?				$\boxtimes$
	Other public facilities?				$\boxtimes$

a) 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: fire protection, police protection, schools, parks, or other public facilities?

#### Fire protection?

The CAP Update does not propose any new development and recommendations are consistent with the growth in housing and population anticipated in the Los Altos General Plan and do not propose any expansion of fire protection services or facilities. Therefore, compliance with existing regulations and standards would prevent any unanticipated demand on fire protection services. **No impact would result.** 

#### Police protection?

The CAP Update does not propose any new development and recommendations are consistent with the growth in housing and population anticipated in the Los Altos General Plan and would not increase the demand for police protection services to the extent that new police protection facilities would be required. Therefore, compliance with existing regulations and standards would not create unanticipated demand on police protection services. **No impact would result.** 

#### Schools?

The CAP Update does not propose any new development and recommendations are consistent with the growth in housing and population anticipated in the Los Altos General Plan and would not increase the demand for school-related services to the extent that new school facilities would be required. If such facilities were required, payment of impact fees for construction of new facilities would constitute sufficient migration for school facility impacts, consistent with state law. **No impact would result.** 

#### Parks?

CAAP recommendations are consistent with the growth in housing and population anticipated in the Los Altos General Plan and would not increase the demand for additional parks. Construction of new parkland would be subject to further CEQA analysis, General Plan policies, and engineering design standards to prevent adverse physical effects. **Therefore, no impact would result.** 

# Other public facilities?

CAAP does not propose any new development recommendations would not result in the need for additional demand for libraries or other governmental services to the extent that new facilities would be required. The plan does encourage City facilities and conduct comprehensive energy efficiency upgrades focusing on energy-efficient lighting, motion sensors, appliances, and HVAC systems. Any necessary upgrades would enhance the environment and would not result in any negative environmental impacts. Therefore, compliance with existing regulations and standards would not create unanticipated demand on other public facilities. **No impact would result.** 

# XVII. TRANSPORTATION

Wo	uld the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				$\boxtimes$
b)	Conflict or be inconsistent with CEQA Guidelines Section 15- 64.3, Subdivision (b)?				$\boxtimes$
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			$\boxtimes$	
d)	Result in inadequate emergency access?			$\boxtimes$	

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

#### b) Conflict or be inconsistent with CEQA Guidelines Section 15-64.3, Subdivision (b)?

The CAP Update is a policy document containing measures and supporting foundational actions that are consistent with the City General Plan with many that are aimed at facilitating the implementation of local transportation regulations. For example, the CAP Update includes foundational actions that would support pedestrian and bicycle circulation and improved transportation alternatives, which would improve connectivity throughout the City. Actions include create a pedestrian-friendly Downtown and other community and commercial spaces throughout the city (1.1 B); develop an electric shuttle program and shared bike, ebike and scooter programs as alternatives to SOV travel (1.3 A); and identify grants and incentives to install EV charging including DCFC, solar EV charging, and paired EV charging + battery storage systems (1.5 D). **No impact would result.** 

The CAP Update is a policy document containing measures and supporting foundational actions are consistent with the City General Plan with many that are aimed at facilitating the implementation of the local transportation regulations. For example, the CAP Update includes foundational actions that would support pedestrian and bicycle circulation and improved transportation alternatives, which would improve connectivity throughout the City (Actions 1.1A – 1.1D, 1.3A -1.3E, and 1.5A – 1.5D). Actions include fully implementing the 2022 Complete Streets Master Plan, developing, and implementing a new Parking Management Plan, pilot shared bike and escooter programs, and expanding transit service and connectivity to transit stops and others referenced above. These CAP Update foundational actions would be consistent with and promote the General Plan and Complete Streets Master Plan. Implementation of some of these measures and foundational actions may require future infrastructure development or improvements, such as bike paths, solar panels, or building energy efficiency retrofits. However, discretionary development would be subject to review by the City for compliance with the General Plan and Municipal Code and be required to comply with applicable local, State, and federal regulations. Therefore, the CAP Update would result in no impact related to consistency with plans addressing the transportation circulation system or CEQA Guidelines Section 15-64.3, Subdivision (b). No impact would result.

# c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The Los Altos CAAP is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the CAAP would not result in construction or operational impacts related to risks associated with transportation design or features. However, the proposed CAP Update measures and supporting foundational action included in the CAP Update promotes alternative modes of transportation and reduction in the amount of vehicle miles traveled through the City. For example, the CAP Update promotes developing a new Parking Management Strategy that supports strategic VMT reduction (1.1 C). The CAAP does not include measures that would substantially increase transportation hazards due to a design feature or incompatible land uses. Furthermore, future site-specific discretionary projects would be subject to subsequent CEQA review wherein site-specific impacts related to hazards or emergency access would be addressed accordingly. Thus, the CAP Update would result in a **less-than-significant impact** related to transportation hazards.

#### d) Result in inadequate emergency access?

The CAP Update is a policy document containing programs that are consistent with the City General Plan and would not facilitate development beyond that allowed under the General Plan. As such, it would not directly create transportation hazards or result in inadequate emergency access. However, the proposed CAP Update measures and supporting foundational actions promote alternative modes of transportation and reduction in the amount of vehicle miles traveled throughout the City. For example, the CAP promotes implementation of the Complete Streets Master Plan to enhance bicycle, pedestrian, and transit connectivity which would provide adequate emergency access. Future, site-specific impacts related to emergency access would be addressed accordingly. Thus, the CAP Update would result in a **less-than-significant impact** related to emergency access.

Wo	uld the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
	<ul> <li>i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or</li> </ul>				$\boxtimes$
	<ul> <li>A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?</li> </ul>				

# XVIII. TRIBAL CULTURAL RESOURCES

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically

defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- *i.* Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
- *ii.* A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

The CAP Update would not involve land use or zoning changes. Rather, the CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR. As a policy document, the CAP Update would not directly require ground disturbing activities. However, implementation of the CAP Update foundational actions and measures may promote infrastructure development and redevelopment. **No impact would result**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
<ul> <li>Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</li> </ul>				$\boxtimes$
b) Have sufficient water supplies available to serve the project and reasonably forseeable future development during normal, dry, and multiple dry years?				$\boxtimes$
c) Result in a determination by the wastewater treatment pro- vider 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?				$\boxtimes$
<ul> <li>Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?</li> </ul>				$\boxtimes$
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				$\boxtimes$

# XIX. UTILITIES AND SERVICE SYSTEMS

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Implementation of the proposed CAAP would not introduce uses that would create wastewater effluent or increase stormwater runoff. The Palo Alto Regional Water Quality Control Plant, which serves the community of Los Altos, has existing remaining capacity allocated for the city to handle projected average dry weather flows for existing conditions and future growth anticipated in the Los Altos General Plan. The proposed CAAP does not propose any new development and is consistent with population and housing growth anticipated in the General Plan and would not directly result in any additional housing or nonresidential development requiring wastewater treatment. **No impact would result.** 

b) Have sufficient water supplies available to serve the project and reasonably forseeable future development during normal, dry, and multiple dry years?

#### Refer to (a) above. No impact would result.

c) 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?

#### Refer to (a) above. No impact would result.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The CAP Update is a guidance document and does not propose development or changes to land use or zoning. The CAP Update includes measures that are aimed at decreasing excess waste including increasing the landfill diversion rate (3.1A); reducing waste from demolition, construction, and building materials (3.1B); and adopting a zero-waste policy for City facilities and City-sponsored events (4.5A). Because the CAP Update is a policy document that would not facilitate growth beyond that anticipated by the General Plan, it would not generate solid waste in excess of State or local standards. Therefore, the CAP Update would result in increases related to solid waste. **No impact would result.** 

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Refer to (d) above. No impact would result.

# XX. WILDFIRE

		Less Than Significant		
	Potentially Significant Impact	with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
<ul> <li>Substantially impair an adopted emergency response plan or emergency evaluation plan?</li> </ul>				$\boxtimes$
<ul> <li>b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?</li> </ul>				$\boxtimes$
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				$\boxtimes$
<ul> <li>Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?</li> </ul>				$\boxtimes$

- a) Substantially impair an adopted emergency response plan or emergency evaluation plan?
- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

According to California Department of Forestry and Fire Protection (CalFIRE), the City of Los Altos is not located in a designated California Fire Hazard Severity Zone<sup>7</sup> or in a State Responsibility Area. High fire hazard rates closely surround the City of Los Altos in the nearby jurisdictions of Portola Valley and Woodside.

The CAP Update is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the CAAP would not result in construction or operational impacts related to wildfire. Additionally, the CAAP is a policy-level document that does not propose new habitable development that could be at risk from wildfire, nor does it grant entitlements for development that would have the potential to directly cause wildfire. Rather, the

<sup>&</sup>lt;sup>7</sup> California Department of Forestry and Fire Protection (CalFIRE). Local Responsibility Area. Available at: <u>https://egis.fire.ca.gov/FHSZ/</u>

CAP Update would aim to reduce natural gas infrastructure that poses wildfire risk if damaged during seismic events and to underground new or restructured electric power lines that pose wildfire risk if damaged during high-wind events. **No impact would result.** 

# XXI. MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?				
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)				$\boxtimes$
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				$\boxtimes$

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

The CAAP is a proactive plan that enables the City to reduce overall impact with both GHG and VMT reduction strategies that align with existing Los Altos General Plan policies. Measures in the document would improve, rather than degrade, the quality of the environment and the quality of life for residents in Los Altos. **No impact would result**.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

The proposed CAAP is designed to reduce GHG emissions, which as stated throughout this Initial Study, would result in beneficial impacts toe air quality, GHG emissions, water quality, land use planning, vehicular noise levels, recreation, and vehicle miles traveled. To the extent that

reducing GHG emissions is considered a cumulative (global) benefit and given that many jurisdictions through the Bay Area are preparing similar plans to reduce GHG emissions, the resulting environmental benefits may also be considered cumulative.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Refer to (a) above. No impact would result.

# **IV. LIST OF PREPARERS**

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