

From: [Shree Dharasker](#)
To: [Nick Zornes](#)
Cc: [Michael Martin](#)
Subject: [External Sender]Notice of Intent to Adopt the draft Initial Study/Mitigated Negative Declaration
Date: Thursday, December 29, 2022 6:24:02 PM

Dear Mr. Zornes,

The Santa Clara Valley Water District (Valley Water) has reviewed the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the City of Los Altos (City) 2023-2031 Housing Element Update, and has the following comments:

1. The Draft Housing Elements states that water supply for residential growth required by the City's share of the Regional Housing Needs Assessment is accounted for in Cal Water's 2020 Urban Water Management Plan. The Urban Water Management Plan assumes a substantial increase in water conservation to meet this goal. Valley Water encourages the City to help meet this goal by requiring all available water conservation measures in new development and redevelopment. Valley Water has been working with jurisdictions throughout the county on a Model Water Efficient New Development Ordinance that the City may consider to ensure there are sufficient water supplies into the future.
2. In addition to water conservation, another element of the county's water supply portfolio is natural groundwater recharge, which is precipitation that infiltrates into the groundwater in the recharge areas of the basin. Within these areas, water from the surface passes through permeable sands and gravels to benefit water supply aquifers. Los Altos is in the recharge area of the Santa Clara Subbasin. Natural groundwater recharge has declined over the last 100 years as impermeable surfaces within the built environment have increase stormwater runoff and limit infiltration of precipitation. Precipitation that once supported the groundwater basin through natural recharge is now removed through stormwater infrastructure to San Francisco Bay. As noted in the Hydrology section, most new development and redevelopment is subject to stormwater quality requirements. Some of the methods used to meet these requirements work by retaining stormwater on the site for infiltration, which can support natural groundwater recharge. However, other methods focus primarily on stormwater quality and do not necessarily support recharge. To address the long-term cumulative impact to natural groundwater recharge, Los Altos should require development to include stormwater measures that retention stormwater on-site to maintain, and in where possible cases, increase natural groundwater recharge and protect groundwater quality.
3. Ensuring an adequate water supply to support existing and future development is one of the key priorities for Valley Water. To help achieve this common goal, Valley Water is available to coordinate with Los Altos regarding water conservation efforts, updated water demand management opportunities, flood protection, and understanding the impacts from anticipated growth.

4. The City Housing Element Update lists proposed sites for redevelopment. Development Plans should be consistent with Valley Water's Guidelines and Standards for Land Use Near Streams. Elements to consider are setbacks for environmental purposes, including enhancements for trail purposes and for flood protection benefits. Valley Water strongly advocates for maximizing vegetation area to enhance the riparian corridor by increasing setback from creek top of bank to any hardscape, roadways, or parking areas associated with the development.
5. Sites selected for redevelopment should be outside FEMA Flood Zones to provide adequate flood protection.

Please forward future environmental documents when available for public comment and review. If you have any questions or need further information, you can reach me by email at sdharasker@valleywater.org or by phone at (408)630-3037. Please reference File # 27532 with any correspondence.

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