

ATTACHMENT C



Memorandum

DATE: February 16, 2022

TO: Radha Hayagreev, City of Los Altos

FROM: Carolyn Neer, Project Manger
Kristy Weis, Principal Project Manager

SUBJECT: Initial Study/Mitigated Negative Declaration for the 4350 El Camino Real Residential Project – Responses to Comments Received

The Notice of Intent to Adopt the Initial Study/Mitigated Negative Declaration (IS/MND) for the 4350 El Camino Real Residential Project was circulated for 30 days from January 11, 2022, through February 14, 2022. The City received two comment letters were received on the draft IS/MND during the 30-day public comment period from:

- Mountain View Los Altos School District (February 1, 2022)
- California Department of Transportation (Caltrans) (February 9, 2022)

Copies of these comment letters are included in Attachment A. The following pages provide a summary of the written comments with responses to the environmental issues raised. No text revisions to the IS/MND are required.

The comments received do not raise any significant new information or substantial evidence in light of the whole record to warrant recirculation of the MND or preparation of an Environmental Impact Report per CEQA Guidelines 15064 and 15073.5. The City Council will review and consider the comments and responses prior to making a decision on the project.

Comment Letter 1: Mountain View Los Altos High School District (dated February 1, 2022)

Comment 1.1: Please consider these initial public comments as environmental impacts that will affect the MVLA School District. The 47 dwelling units planned for construction will generate four students for the District to house. Based on a per pupil cost of \$202,723/student, the total cost to house four pupils is \$810,892 with a total impact per sq. ft. of \$11.78/sq. ft.

Response 1.1: As noted on pages 116 and 119-120 of the Initial Study, pursuant to California Government Code Section 65996, payment of school impact fees by new development constitutes full and complete mitigation of impacts to school facilities under CEQA. In accordance with this statute, the project applicant shall pay applicable school impact fees to offset increased demand on school facilities generated by the project. The comment does not raise any issues about the adequacy of the IS/MND.

Comment Letter 2: Caltrans (dated February 9, 2022)

Comment 2.1: Travel Demand Analysis. The project VMT analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. Per the IS/MND, this project is found to have a less than significant VMT impact, therefore working towards meeting the State's VMT reduction goals.

Response 2.1: The comment acknowledges the VMT impact conclusion in the Initial Study. The comment does not raise questions regarding the adequacy of the IS/MND; therefore, no further response is warranted.

Comment 2.2: Construction-Related Impacts. Potential impacts to the State Right-of-Way (ROW) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified. Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>. Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

Response 2.2: The project is not proposing new temporary construction-related access points along state facilities. All access during the construction phase of the project shall be provided via existing driveways located along El Camino Real and Los Altos Avenue. Project related construction noise impacts are discussed in Section 4.13 Noise of the IS/MND. The project applicant shall obtain a transportation permit from Caltrans should movement of oversized or excessive load vehicles on State roadways be required. The comment does not raise any issues about the adequacy of the IS/MND.

Comment 2.3: Lead Agency. As the Lead Agency, the City of Los Altos is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Response 2.3: The project does not include any improvements to the State Transportation Network. A draft Mitigation Monitoring and Reporting Program, which identifies required mitigation measures, method of verification for completion, responsibility for verification,

and schedule/timing, has been prepared for the project and would be adopted with the MND. The comment does not raise any issues about the adequacy of the IS/MND.

Comment 2.4: Equitable Access. If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Response 2.4: The project shall comply with applicable ADA standards if Caltrans facilities are impacted and maintain bicycle and pedestrian access during construction. The comment does not raise issues about the adequacy of the IS/MND.

Comment 2.5: Encroachment Permit. Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating Caltrans' ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to D4Permits@dot.ca.gov.

Please note that Caltrans is in the process of implementing an online, automated, and milestone-based Caltrans Encroachment Permit System (CEPS) to replace the current permit application submittal process with a fully electronic system, including online payments. The new system is expected to be available during 2022. To obtain information about the most current encroachment permit process and to download the permit application, please visit <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

Response 2.5: If an encroachment permit is required from Caltrans, the project applicant shall complete the encroachment permit submittal process. The comment does not raise any issues about the adequacy of the IS/MND.



Serving the communities of Mountain View, Los Altos and Los Altos Hills

MOUNTAIN VIEW LOS ALTOS HIGH SCHOOL DISTRICT

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SUPERINTENDENT

Dr. Nellie Meyer

February 1, 2022

City of Los Altos
Community Development Department
Attention: Sean Gallegos, Senior Planner
One North San Antonio Road
Los Altos, CA 94022

Dear Mr. Gallegos:

The Mountain View Los Altos High School District (MVLA) received a Notice of Intent to Adopt a Mitigated Negative Declaration regarding a development project at 4350 El Camino Real, Los Altos, CA 94022. Please consider these initial public comments as environmental impacts that will affect the MVLA School District.

The 47 dwelling units planned for construction will generate four students for the District to house. Based on a per pupil cost of \$202,723/student, the total cost to house four pupils is \$810,892 with a total impact per sq. ft. of \$11.78/sq. ft. The cost calculations are as follows:

Projected Students

Table with 4 columns: Unit Type, # of Units, Student Generation Rate, Students Projected. Rows include Multi-Family, Below Market, and Total.

2022 Cost to Construct New School (land not included)

Table with 3 columns: Construction Cost, School Capacity, Cost Per Student. Row shows \$121,633,925, 600, and \$202,723.

*Kramer Project Development, Quattrochi Kwok Architects



Cost to House Projected Students

Projected Students	Cost Per Student	Cost
4	\$202,723	\$810,892

Cost Per Square Foot

Total Square Feet	Cost	Cost Per Square Foot
68,815	\$810,892	\$11.78

The constituents of the Mountain View Los Altos High School (MVLA) community expect, deserve, and receive a high standard of academic excellence along with a high standard of school facility accommodations to house students. Great schools and high standards are the expectation of those purchasing housing in Los Altos.

Three developers in Mountain View have chosen to voluntarily pay a fee in excess of Level 1 Statutory fees in support of high school housing District standards.

The MVLA High School District shares Level I statutory fees with its feeder districts and collects 33% of the fee. The District requests that developers voluntarily pay a fee of 33.33% of the actual cost of \$11.78 per sq. ft. to house 9-12 students as follows:

$$\$11.78 \times .3333 = \$3.93 \text{ per sq. ft.} \times 68,815 \text{ sq. ft.} = \$270,443$$

This voluntary provision increases the developer fee and will assist the MVLA District in closing the school construction funding gap.

Thank you,



Mike Mathiesen
Associate Superintendent Business Services



California Department of Transportation

DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



February 9, 2022

SCH #: 20220100139
GTS #: 04-SCL-2022-01006
GTS ID: 25249
Co/Rt/Pm: SCL/82/22.1

Radha Hayagreev, Senior Planner
City of Los Altos
1 North San Antonio Road
Los Altos, CA 94022

Re: 4350 El Camino Real Multiple Family Building Mitigated Negative Declaration (MND)

Dear Radha Hayagreev:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 4350 El Camino Real Multiple Family Building Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the January 2021 MND.

Project Understanding

The project proposes to demolish an existing gasoline service station on site and construct a new five-story residential building with two below-ground parking levels. The building would contain 47 residential units, seven of which would be below market rate units. The project would include a courtyard area with seating areas and raised planters, and 12,359 square feet of common open space. Vehicle access to and from the proposed parking garage would be provided via a single driveway on El Camino Real.

Travel Demand Analysis

The project VMT analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. Per the IS/MND, this project is found to have a less than significant VMT impact, therefore working towards meeting the State's VMT reduction goals.

Construction-Related Impacts

Potential impacts to the State Right-of-Way (ROW) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified. Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>. Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

Lead Agency

As the Lead Agency, the City of Los Altos is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating Caltrans' ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to D4Permits@dot.ca.gov.

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Radha Hayagreev, Senior Planner
February 9, 2022
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the permit application, please visit <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D4@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Mark Leong". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

MARK LEONG
District Branch Chief
Local Development Review

c: State Clearinghouse