

## MODIFICATIONS INCLUDED IN STAFF REPORT AND OTHER EXHIBITS

1. GPAC recommended changes to the Vision and Guiding Principles, included in Exhibit 6 and summarized here:
  - Revise the Vision for added clarity and add a sentence about racial, social, and environmental justice;
  - Delete “downtown” from the Community Vitality Guiding Principle so that it applies throughout Town;
  - Add a new Guiding Principle titled “Connectivity” to state the importance of connecting all facets of the Town to build a strong sense of community through building design, walkability, and safe streets;
  - Delete “the Town’s” from the Fiscal Stability/Responsibility Guiding Principles; and
  - Replace the word “Recognize” with the word “Value” in the Inclusivity Guiding Principle.
2. Revisions as a result of review by the State Department of Forestry, included in Exhibit 8 and listed here:
  - Add reference to VHFHSZ’s in Policies CD-5.2 and CD-6.1.
  - New Policy PFS-1.7: “Water Supply for Fire Safety. Coordinate with local water providers to ensure and maintain the long-term sustainability of water supplies to meet current and anticipated future firefighting needs.”
  - Modified wording for Policies PFS-19.3 and PFS-20.1.
  - Modified wording for Policy HAZ-1.3.
  - Additional wording on page 9-4 to reference location of critical infrastructure listed in OAHMP.  
New Policy HAZ-2.6: “Vegetative Hazards. Reduce the wildfire risks to existing and newly developed transportation networks through regular clearance and maintenance of vegetation adjacent to public roadways to current State and/or locally adopted fire safety standards for vegetation clearance in SRA’s or VHFHSZ’s.”
  - New Policy HAZ-2.7: “Wildfire Response. Following a large and/or destructive fire in Los Gatos or the region, the Town shall reassess standards and other requirements for new development and redevelopment and revise these requirements to ensure a high level of community resilience to fire events.”
  - New Policy HAZ-2.8: “Community Fire Breaks. Establish and maintain community fire breaks and fuel modification/reduction zones, including public and private road clearance.”
  - New Policy HAZ-2.9: “Fire Safety Development Precautions. Establish that minimum requisite firefighting services and infrastructure are ubiquitous throughout its Town, including but not limited to: high-visibility street signage and house numbers, appropriate street widths and building clearances for firefighting equipment and vehicles, high water pressure at all fire hydrants, and driving signage indicating rights-of-way with no outlets.”
  - Modified wording for Policy HAZ-3.5.

EXHIBIT 7

- New Policy HAZ-3.7: “Community Evacuation Trainings. Continue to conduct regular evacuation trainings with single-access community HOAs, residents, and the Wildfire Ad Hoc Committee; encourage residents in single-access communities to maintain emergency supplies for at least three days.”
  - Modified wording for Hazards and Safety Element Implementation Programs C, G, and H.
3. Staff recommends a new Implementation Program in the Land Use Element as discussed in Section F of the Staff Report:
- Five-year Land Use Element Review**
- The Town shall conduct a review of the Land Use Element every five years from the date of final approval, and revise and update as necessary. This review can include the following:
- Modify, add, or delete goals, policies, or programs to reflect notable changes in the Town over the previous period;
  - Remove or modify programs that have been completed or require additional time;
  - Modify or add new goals, policies, or programs to reflect changing needs within the Town;
  - Conduct a fiscal analysis; and
  - Modify to reflect applicable changes in State law.
4. Staff from Parks and Public Works Department recommended Figure 5-1 Bike Facilities should be revised in the following ways:
- Shannon Road from Los Gatos Blvd to Cherry Blossom Lane should be revised from “Proposed Class I” to “Proposed Class II;”
  - Installation of Class IV bike lanes on Winchester from Blossom Hill Road to Wimbledon Drive should be updated to reflect recent improvements as “Existing Class IV;” and
  - Blossom Hill Road between Los Gatos Boulevard and Highway 17 should be revised from “Proposed Class I/IV” to “Existing Class IV.”
5. Staff from Parks and Public Works Department recommended 5-3 Roadway Classifications should be revised in the following ways:
- Where the functional classification lines overlap Town Limits lines, make functional classification lines more visible;
  - Bachman should be extended to University as a Neighborhood Collector;
  - Bayview between Main and Pennsylvania should a Neighborhood Collector;
  - Netflix campus circulation (northeast of 85/Winchester) is shown as Arterial. It should be Local;
  - Hicks should extend south to Town Limits as a Hillside Collector;
  - Gateway should be a Neighborhood Collector;
  - Longmeadow and Twin Oaks should be a Hillside Collector;
  - South Kennedy should be extended to Kennedy as a Hillside Collector; and
  - Union should be an Arterial.
6. Staff from Parks and Public Works Department recommended a street classifications list, similar to that included as Appendix F of the 2020 General Plan EIR, should also be included in the 2040 General Plan in association with their representation in Figure 5-3.

7. For compliance with the Town’s Green Stormwater Infrastructure Plan staff at the West Valley Clean Water Program and the Town’s Parks and Public Works Department recommend the following changes:
- Policy PFS-3.2 Non-Point Source Control Programs  
Promote and implement ~~Provide non-point source~~ pollution source control programs to reduce and control the discharge of pollutants into the storm drain system, as required by the Town’s stormwater NPDES permit. Incorporate green stormwater infrastructure (GSI) elements, such as biotreatment or infiltration into private and public development to provide opportunities for stormwater collection and treatment, per the Town’s GSI Plan.
  - Add the following Implementation Programs to the Public Facilities, Services, and Infrastructure Element:
    - Incorporate Green Stormwater Infrastructure (GSI) elements, such as infiltration and biotreatment, into Town projects to provide opportunities for stormwater collection and treatment, per the Town’s GSI Plan.
    - Modify the Town’s Complete Streets Policy to include Green Stormwater Infrastructure.
  - Add the following underlined text to the introduction paragraph for Section 8.10 Hydrology and Water Quality:  
Maintaining water quality and availability is a high priority and a complex challenge that becomes more critical as supplies become more uncertain due to climate change and a growing population. Goals and policies in this section address the quality and reliability of the Town’s long-term water supply, including during periods of drought. To maintain water quality, surface water and groundwater must be protected from the impacts of past and future development using methods such as low-impact development requirements and the careful regulation of sub-surface dewatering. The Town supports the efforts of regulatory bodies, such as the San Francisco Regional Water Quality Control Board, the agency that controls discharge to San Francisco Bay from stormwater and other sources. The San Francisco Bay Region Municipal Regional Stormwater NPDES Permit (MRP) requires the Town of Los Gatos to implement programs that reduce urban runoff pollution. The MRP regulates stormwater discharges into local creeks and the San Francisco Bay to protect water quality. The Town participates in the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP), along with twelve other cities and towns, the County of Santa Clara, and the Santa Clara Valley Water District to implement the requirements of the MRP. As required by the MRP, the Town has developed a Green Stormwater Infrastructure (GSI) Plan that describes how the Town will gradually transform its urban landscape and storm drainage systems from “gray” to “green”; that is, supplement traditional storm drain infrastructure, where stormwater runoff flows directly from impervious surfaces into storm drains and receiving waters, with a more resilient, sustainable system that reduces and slows runoff by dispersing it to vegetated areas, promotes infiltration and evapotranspiration, collects runoff for non-potable uses, and treats runoff using biotreatment and other GSI practices. The

control of wastewater and stormwater is discussed in more detail in the Public Facilities, Services, and Infrastructure Element.

- Revise Policy ENV-17.5 to state:  
Retain and use rainwater on municipal facility sites, to the extent possible. Encourage rainwater harvesting and irrigation use in commercial and residential uses. Ensure that all development projects in Los Gatos maximize opportunities to filter, infiltrate, store, and reuse or evaporate stormwater runoff onsite.

## MODIFICATIONS SUGGESTED IN PUBLIC COMMENTS

*(Staff comments/recommendations in italics)*

### Introduction:

8. Revise the Protect Natural Resources Guiding Principle to say, “Protect and enhance the natural environment, scenic assets, and biotic communities that define Los Gatos, including but not limited to, open space preserves, recreational trails, surrounding hillsides, and waterways.” *(neutral)*

### Racial, Social, and Environmental Justice Element:

9. Prioritize other topics by moving the Racial, Social, and Environmental Justice Element so that it is not first, or delete entire section. *(neutral on order of Elements)*
10. Inequities need to be discovered through looking at services through a more equitable lens in order to properly address them. Change Policy RSEJ-1.1 title from “Service Delivery” to “Identify Inequities.” *(neutral)*
11. Revise Policy RSEJ-1.4 to state, “Encourage development and improved access to affordable housing opportunities for all community members.” *(neutral)*
12. Revise Policy RSEJ-1.6 to include some data collection/analysis to measure the perceptions of residents, workers, and visitors by modifying to state, “~~Promote~~ improve the perception score of Los Gatos as a welcoming, safe, and inclusive community regardless of age, ability status, and socio-economic status.” *(not recommended)*
13. In Policy RSEJ-1.7 use “increase” or “improve,” instead of “promote” in “Promote access to a quality living wage for all community members.” *(neutral)*
14. In Policy RSEJ-2.5 add recruiting/hiring from San Jose State University. *(neutral)*
15. Revise Policy RSEJ-2.7 to state, “~~Develop and i~~ Implement and require cultural proficiency and anti-bias training for all Town employees and support similar training efforts undertaken by the business community.” *(neutral)*
16. Revise Policy RSEJ-2.8 to state, “Promote and encourage cultural proficiency and anti-bias training for all members of the community including residents, business owners, and local organizations.” *(neutral)*
17. In Policy RSEJ-6.2 clarify what it means and who is the target. *(neutral)*
18. Revise Policy RSEJ-6.3 to state, “Develop, provide, p ~~Promote,~~ and implement new and innovative approaches to facilitate communication between members of the community and Town elected officials and staff members.” *(neutral)*

19. Revise Racial, Social, and Environmental Justice Element Implementation Program N Tree Canopy Study to state, “Develop a study to measure tree canopy distribution throughout the Town and encourage the use of native plants ~~when increasing green space~~. Consider habitat value in tree selection for the Town’s forest, and disallow the planting of invasive species.” *(neutral)*

Land Use Element:

20. Modify the number of new housing units:
  - a. No increase in housing levels. *(not recommended)*
  - b. Reduce the number of new housing units to a lower less ambitious target. *(neutral)*
  - c. Reduce the number of new housing units to 1,993. *(not recommended)*
  - d. Reduce the number of new housing units to 1,993 plus a 15-20 percent buffer. *(neutral)*
21. Modify land use designation of the property at 15810 Los Gatos Boulevard, APN 523-01-001, from Low Density Residential to Mixed-Use Commercial to be more in line with existing use. *(recommended)*
22. Build a high-rise condo on the corner of Los Gatos Boulevard and Los Gatos-Almaden Road. *(construction is not within the purview of the General Plan, but increased height limits in the Mixed Use Commercial land use designation could be considered)*
23. Include Opportunity Areas in the General Plan as outlined in the Land Use Alternatives Report. *(not recommended due to previous GPAC direction)*
24. Maintain existing 2020 General Plan densities for Low Density Residential. *(neutral)*
25. Re-designate Hillside Residential “Fringe Areas” adjacent to San Jose for denser housing. *(neutral)*
26. Establish a new Low-Medium Density Residential land use category that allows for the development of duplexes and triplexes at a density range of between 6 and 13 dwelling units per acre. *(neutral)*
27. Utilize maximum FAR only for the non-residential components of mixed-use projects, because housing will be limited by maximum density. *(neutral)*
28. Change development rules to increase construction of diverse housing types, including greater density, higher height limits, lower parking requirements, more transit, and connection to light rail. *(neutral)*
29. Allow mixed-use developments in the High Density Residential designations. *(neutral)*
30. Increase maximum height limit on Los Gatos Boulevard from 45 to 55 or 65 feet to allow for the 4 over 1 product type (four stories of residential over one floor of retail or parking structure) or 5 over 1. *(neutral)*
31. Reduce the maximum allowed FAR in the Central Business District from 2.0 to 1.25. *(neutral)*
32. Table 3-1 should reflect an opportunity for additional new residential development on the North 40, if so desired by the Town. *(not recommended as the Draft 2040 General Plan land use regulations do not include any change to the North 40 Specific Plan)*
33. Modify Policy LU-3.2 to state, “Projects shall be evaluated and the Town shall apply appropriate mitigation measures and/or conditions of approval to reduce impacts on the

environment, urban services, and wildfire risk, including utilities, police, and fire.”  
(*neutral*)

34. Modify Goal LU-6 to state, “Ensure housing in the hillsides will not adversely affect the natural environment, migration and biological corridors, or endanger public health and safety.” (*neutral*)
35. Modify Section 3.6 Special Planning Areas to note that the North 40 Specific Plan was amended on September 4, 2018 after nearly 2 years of deliberation (starting on September 27, 2016 with a special meeting of Town Council). The Amendment was to Section 6.4.1 of the Specific Plan and it now allows that proposed developments within the Specific Plan “may request to enter into a Development Agreement reviewed pursuant to the established Architecture and Site Review approval process or the Planned Development Overlay process.” (*neutral*)
36. Either remove the North 40 from the Los Gatos Boulevard Community Place District or provide clarity as to the hierarchy of competing rules between the General Plan and the Specific Plan. (*not recommended, the changes in the Draft 2040 General Plan do not change the relationship between the General Plan and the North 40 Specific Plan*)
37. Modify Policy LU-20.1 to state, “The Town shall facilitate opportunities for all residents, other local governments, and stakeholders to provide meaningful and effective input on proposed planning activities early on and continuously throughout development review and the public review process.” (*neutral*)
38. Include a statement in Section 3.10, Goal LU-21, and/or Policy LU-21.1 on how the Town will engage and coordinate with public agency stakeholders, such as Midpen, in Town planning and policy projects that may impact the lands or responsibilities of those local agencies. (*neutral*)
39. In Policy LU-20.4, to increase public participation, include the use of traditional forms of communication, such as flyers mailed to homes, local newspaper ads, posters around town and places of worship, and other gathering points, and inclusion in school-published bulletins sent to parents, etc. (*neutral*)
40. Add a policy or implementation program to support a modification of the North 40 Specific Plan to allow up to 40 dwelling units per acre to be consistent with the Mixed-Use land use designation on Los Gatos Boulevard. (*neutral*)

#### Community Design Element:

41. Change the use of “Community Place District” to “Community Growth District” throughout document. (*neutral*)
42. To provide more flexibility in building style, consider deleting Policy CD-2.2: “Require multi-story buildings to incorporate step backs on upper floors to create a more humanscale and comfortable pedestrian environment.” (*neutral*)
43. Revise Policy CD-2.12 to state, “If feasible, require native, non-invasive, or non-fire-prone street trees to be installed for all new developments, to enhance neighborhood character and identity and to maximize shade coverage when mature.” (*neutral*)
44. Revise Policy CD-2.21 to state, “In high-density planning zones, the minimal amount of pedestrian-oriented lighting necessary should ~~shall~~ be provided in active pedestrian areas

and common areas for safety and security purposes." *(not recommended as the effect of these changes is a reversal of the policy's intent)*

45. Revise Policy CD-2.24 to state, "Encourage improvements to the public realm, including tree canopies, street furniture, paving, and landscaping, ~~and lighting.~~" *(neutral)*
46. Include the dark-sky and/or the Illuminating Engineering Society of North America Model Lighting Ordinance or reference section ENC-7.11 in Policy CD-2.30. *(neutral)*
47. Revise Policy CD-2.31 to state, "Provide clear limits for ~~Encourage~~ lighting in mixed-use and commercial developments, including the prohibition of uplighting, limiting the Correlated Color Temperature of lighting, and turning off lights after activity hours, in order to find the balance between friendly illumination and preventing unnecessary light at night. such as string lighting, pole mounted lighting, and tree hanging lighting, to further illuminate the site during nighttime hours for safety and community." *(not recommended as the effect of these changes is a reversal of the policy's intent)*
48. Revise Policy CD-2.40 to state, "Ensure that public improvements and private development provide landscaped Town gateways that create visual connections between the natural hillsides and open space areas and the community of Los Gatos with native, non-invasive, or non-fire-prone plant species." *(neutral)*
49. Add a new Policy CD-5.6 Preserve Sensitive Natural Communities. "Sensitive natural communities are communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects. These communities may or may not contain special status plants or their habitat." *(neutral)*
50. Include the dark-sky and/or the Illuminating Engineering Society of North America Model Lighting Ordinance or reference section ENC-7.11 in Policy CD-6.5. *(neutral)*
51. Revise Policy CD-6.5 to state, "Outdoor lighting shall be limited and shielded so as not to be viewable from non-hillside areas and shall be of low intensity and of the lowest Correlated Color Temperature (CCT) available, no more than 3000K." *(neutral)*
52. Remove Policy CD-9.2, and instead widen, reduce traffic signals, and prohibit parking on Los Gatos Boulevard to increase travel capacity. *(not recommended)*
53. Revise Policy CD-9.9 to state, "To soften the appearance of hardscape, incorporate landscaped medians using drought tolerant, native, non-invasive, or non-fire-prone plants, landscape buffers, and street trees."
54. Modify Policy CD-11.6 to note that new trail connections located on or open to Valley Water property must be open to the general public and permitted by Valley Water. *(neutral)*
55. Add Policy or Implementation Program to adopt the Mills Act. *(neutral)*

#### Mobility Element:

56. Remove Policy MOB-9.5 and increase capacity of SR 17 and SR 85. *(not recommended)*
57. Rebuild railway between Los Gatos and Santa Cruz as a mixed freight and public transit project. *(outside the purview of the Los Gatos General Plan)*
58. Make downtown streets bike and pedestrian only. *(not recommended)*
59. Require that new homes, duplexes, and ADUs provide off-street parking. *(not recommended)*

60. Add on/off ramps from SR 85 to Winchester. *(outside the purview of the Los Gatos General Plan)*
61. Add a new policy or implementation measure to consider a Town-wide Transit Signal Priority (TSP) system, and pursue funding for TSP implementation from new development, either through individual project contributions or the Town's Transportation Impact Fee program. *(The Town is working on the installation of Smart Signal infrastructure)*
62. Add a new policy to work with VTA to identify where queue jump treatments for busses at intersections would be possible and effective, and pursue funding for design and implementation of queue jump treatments from new development, either through individual project contributions or the Town's Transportation Impact Fee program. *(neutral)*
63. Add a new policy to work with VTA to identify locations for and implementation of in-lane bus stopping at key locations with merge challenges. *(neutral, where right-of-way allows)*
64. Add a new policy to identify Winchester Boulevard as a corridor for Complete Streets improvements including:
  - Overall lane reduction and implementation of a Class IV separated bikeway;
  - Installation of bus boarding islands and improvements to address missing sidewalk gaps to make better connections to these bus stops;
  - Improvements to pedestrian crossings across Winchester Boulevard, including high visibility crosswalks and integration of crossings into VTA bus stops; and/or
  - Signal improvements, including Transit Signal Priority, at Blossom Hill and Winchester Boulevard. *(could be considered as part of future update to Bike and Pedestrian Master Plan)*
65. Add a new policy to identify Los Gatos Boulevard as a corridor for Complete Streets improvements and integration with the large bicycle network identified in the VTA Bicycle Superhighway Implementation Plan. *(could be considered as part of future update to Bike and Pedestrian Master Plan)*
66. Add a policy in Section 5.7 to analyze and phase in on-street parking pricing to help improve the availability of on-street parking (through active monitoring of pricing and utilization), reduce congestion due to circling, lessen delay to transit vehicles, and reduce VMT. *(Council is implementing the Parking Study including paid parking)*
67. Add a definition of Traffic Impact Policy in the Glossary. *(recommended)*
68. Policy MOB-13.1 should include specific standards for shared parking that will be allowed in Town. *(shared parking is addressed in other Town policies and codes)*

Public Facilities, Services, and Infrastructure Element:

69. Consider the following additions under Goal PFS-1:
  - Consider adopting the MWENDO.
  - Encourage non-potable reuse of water like graywater and rainwater/stormwater in new development and remodels.
  - Require dedicated landscape meters where applicable.



- Require installation of separate submeters to each unit in multi-family developments and individual spaces within commercial buildings to encourage efficient water use. *(neutral)*
70. In Section 6.3 of the Public Facilities, Services, and Infrastructure Element clarify the second paragraph under Natural Drainage Systems. All creeks listed except Smith and San Tomas Aquino Creek flow to the Guadalupe River and the Guadalupe River is not within the Town limits. *(recommended)*
  71. Revise Goal PFS-5 to state, “Conserve landfill space through composting, green waste, and chipping programs.” *(not recommended, as the additional language limits the intent of the Goal)*
  72. On page 6-14 of the Public Facilities, Services, and Infrastructure Element LGS Recreation should be mentioned as the childcare provider with four Clubhouse childcare sites on the LGUSD campuses. For completeness it should be mentioned LGS Rec publishes a brochure of program offerings three times per year and offers several thousand programs and services for all ages. *(neutral)*
  73. On page 6-15 of the Public Facilities, Services, and Infrastructure Element, move Figure 6-1 “Recreation Locations” to the end of the section so it doesn't break up the discussion of recreation and social activities. *(recommended)*
  74. Revise Policy PFS-13.4 to state, “Coordinate with local organizations, including LGS Recreation, to support intergenerational opportunities for seniors to safely interact with youth in Los Gatos.” *(neutral)*
  75. Policies PFS-14.1 and PFS-14.3 describe Senior Services and indicates that the Town Manager connects seniors with resources in the community. This is the role of the LGS Rec along with other service providers. *(neutral)*
  76. Revise Policy PFS-18.1 to state, “~~Emphasize~~ Consider the use of CPTED principles in physical site planning as ~~an effective~~ potential means of ~~reducing~~ preventing crime. ~~Open spaces, landscaping, parking lots, parks, play areas, and other public spaces shall be designed with maximum possible visual and aural exposure to community residents.~~” *(neutral)*
  77. Revise Policy PFS-25.3 to state, “Encourage new or expanded public and private facilities or community center to host performing arts events.” *(neutral)*
  78. Revise Policy PFS -25.4 to state, “Encourage private and public funding, development, and operation of cultural amenities, activities, and community centers.” *(neutral)*
  79. Add more fruit trees throughout Los Gatos to increase supply of locally grown, fresh, healthy food, possibly under Section 6.13. *(neutral)*
  80. Revise Public Facilities, Services, and Infrastructure Element Implementation Program L Outdoor Lighting Standards to state, “Establish outdoor lighting standards in the Town Code to address energy efficiency, dark sky conservation, and healthy ecosystems.” *(neutral)*

Open Space, Parks, and Recreation Element:

81. Revise Policy OSPR-2.1 to state, "Preserve the natural open space character of hillside lands, including natural topography, ~~natural~~ native vegetation, wildlife habitats and migration corridors, and viewsheds." *(neutral)*
82. Revise Section 7.2 of the Open Space, Parks, and Recreation Element where it states that recreation services are provided on a full cost-recovery model. This does not accurately reflect the service model for recreation. *(neutral)*
83. Provide objective criteria, such as State Quimby Act guidelines, for open space dedication requirements in Policy OSP-4.6 and Implementation Program C. *(neutral)*
84. Modify Goal OSP-5 to state, "Preserve and enhance Los Gatos Creek, Los Gatos Creek Trail, and Ross Creek as open space amenities, which are critical to protecting biological resources." *(neutral)*
85. Re-evaluate service model for offering recreation services to the community in order to continue Policies OSPR-6.3 and 6.4 and achieve financial stability. *(neutral)*
86. Plan for additional soccer fields. *(neutral)*
87. Add a policy prohibiting artificial turf, especially on Town-owned fields like Creekside Sports Park. *(neutral)*
88. Work with Schools to make school fields available for community sports. *(neutral)*

Environmental and Sustainability Element:

89. Define the term "designated creek." *(recommended)*
90. Revise the definition of "Ecosystem" in the Key Terms Section to state, "A community or group of living organisms that live in and interact with each other in a specific physical environment." *(neutral)*
91. Modify Goal ENV-2 to state, "Maintain and enhance trees and significant natural features, especially native species and habitat." *(neutral)*
92. Revise Policy ENV-2.3 to state, "Continue to update landscape design guidelines for development consistent with Biological Resources goals and policies. Landscape design should promote the implementation of locally native species, drought tolerant species, and fire-wise plants and designs, including in hillside areas and future planning areas." *(neutral)*
93. Revise Policy ENV-4.2 to state that, "Maintain and support a network of open space preserves that protects the urban and natural forest and offers all residents access to nature while reserving some open space preserves for undisturbed habitat." *(neutral)*
94. Revise Policy ENV-5.2 to state, "Require public and private projects to protect special-status native plant species and natural communities." *(neutral)*
95. Change Policy ENV-7.6 to state, "Consider alternative methods prior to utilizing herbicides and pesticides on Town property as one tool within a comprehensive integrated pest management framework to minimize potential damage to native plants, birds, and other wildlife" and add "Integrated Pest Management (IPM)" to the list of key terms. *(neutral)*
96. Revise Policy ENV-7.7 to state, "Require that herbicides and pesticides used in areas adjacent to creeks and other water bodies are approved for use in aquatic habitats, ensuring minimized potential damage to public health, native plants, birds, and other wildlife." *(neutral)*

97. Modify Policy ENV-7.10 to state, “Require that new development, remodels, and retrofits ~~to~~ increase bird safety by reducing hazardous building and architectural elements, and including bird safe and lighting design.” *(neutral)*
98. Modify Policy ENV-7.11 to state, “Require the design of building, street, landscape, and parking area lighting to improves safety, energy efficiency, protection of the night skies (dark sky protections), biological resources, and environmental soundness.” *(neutral)*
99. In Goal ENV-8 consider trade-offs between reduced carbon sequestration from reduced fuel load and emissions from prescribed fires that establish ecological resiliency in the face of wildfire, given the overwhelming benefits of reduced risks of catastrophic wildland fire on climate change. *(neutral)*
100. Modify Policy ENV-8.3 to state, “Require decreases to vehicle miles traveled (VMT), or other noise and air quality impacts mitigation measures, whenever the environmental review document concludes that the traffic generated by a development project would result in adverse impacts from air and noise pollution. Decreases in VMT could be ~~achieved~~ achieved through transportation demand management (TDM) programs.” *(neutral)*
101. Modify or remove Policy ENV-8.7 to state, “Require developments to incorporate site planning, and other techniques to ~~that~~ reduce exposure of people to the impacts of high air pollutants from adjacent roadways.” *(neutral)*
102. Consider modifying Policy ENV-9.14 to reduce potential impact of requirement to exceed Title 24 on feasibility of construction of new affordable housing. *(not recommended)*
103. Revise Goal ENV-10 to state, “Become a zero-waste Town through encouraging sustainable procurement, extended producer responsibility, ~~and~~ innovative strategies, composting, green waste, and chipping programs.” *(neutral)*
104. Revise “Groundwater Management” section on page 8-19 as follows:  
 Valley Water manages the groundwater sub-basin with the primary objectives to recharge the basin, conserve water, increase water supply, and prevent waste or reduction of the water supply. Historically, over-extraction of the groundwater sub-basin has resulted in occurrences of subsidence in Santa Clara County. Subsidence occurs when underground water levels drop and clay layers compact, resulting in the sinking of the ground surface and a loss of aquifer capacity. To avoid any further subsidence ~~and loss of aquifer capacity~~ Valley Water works to maintain the sub-basin by augmenting natural percolation of rainfall and local stream runoff ~~with~~ via managed aquifer recharge using local and imported surface water. Valley Water’s ~~managed-supports~~ a recharge program ~~that~~ includes 18 major recharge systems with in-stream and off-stream facilities. In addition to directly replenishing groundwater, Valley Water reduces the need for groundwater pumping through treated and untreated surface water deliveries, water conservation, and recycled water programs.

Based on these efforts, permanent subsidence was effectively halted around 1970, and groundwater levels recovered to sustainable levels. In 2019, Valley Water’s Groundwater Management Plan was approved by the Department of Water Resources as an Alternative to a Groundwater Sustainability Plan for Sustainable Groundwater Management Act compliance. While groundwater levels and storage decline during droughts, Valley

Water's comprehensive groundwater management activities provide for subsequent recovery, and groundwater in the sub-basin is sustainably managed.

~~Valley Water operates a treated groundwater recharge/surface water reinjection program that promotes treated groundwater reuse from the clean up of contaminated sites and recharges groundwater from local and imported surface water. Based on these efforts, the groundwater elevation in the groundwater sub-basin has been rising steadily for the past 40 years. As stated in the 2017 Valley Water Annual Groundwater Management Report, the groundwater supply has reached a "normal" stage (stage 1) of the District's Water Shortage Contingency Plan and indicates good water supply conditions. (neutral)~~

105. Revise second paragraph of the "Groundwater Quality" section on page 8-22 as follows: A few water quality problems have been detected in the sub-basin. High mineral salt concentrations have been identified in the upper aquifer zone along San Francisco Bay, the lower aquifer zone underlying Palo Alto, ~~and the southeastern portion of the forebay area of the Santa Clara Valley sub-basin. Nitrate concentrations in the South County (Coyote and Llagas sub-basins) are e.~~ Elevated and high nitrate concentrations are sporadically observed in the Santa Clara Valley Sub-basin. Monitoring continuously, installing physical barriers to runoff, and treating water properly are key activities used throughout the wastewater treatment and water conveyance system to maintain water quality standards. D However, drinking water standards are met at public water supply wells without the use of treatment methods beyond disinfection. Valley Water and public water suppliers conduct extensive monitoring of groundwater quality to understand conditions and trends and work with regulatory agencies to protect groundwater quality. (neutral)
106. Modify Policy ENV-16.4 to state, "Conserve existing creeks and avoid disturbances, including fencing, lighting, structures, hydrological barriers, and roads, to these areas." (neutral)
107. Revise Policy ENV-16.3 to state, "Cooperate with Valley Water and other agencies to protect watersheds, groundwater, and riparian habitats from degradation." (neutral)
108. Revise Policy ENV-17.8 to state, "Encourage Low-Impact Development (LID) measures to limit the amount of impervious surface in new development and redevelopment to maintain or increase the retention, treatment, and infiltration of urban stormwater runoff from pre-development conditions. LID measures should also apply to major remodeling projects and to public and recreation projects where possible." (neutral)
109. Clarify how Policy ENV-18.5 applies to mixed-use neighborhoods. (neutral)
110. Revise Policy ENV-19.1 to state, "Require all new noise-sensitive developments, and sound- or noise-generating uses near open space, to provide a noise study prepared by a licensed acoustician with recommendations for reducing noise impacts to the maximum allowed level in the Noise Ordinance." (neutral)
111. Add a policy to add a habitat overlay zone or riparian buffer zone to ensure riparian setbacks are enforced and riparian corridors are protected. (not recommended as a standard buffer or setback would not reflect the varying character and sensitivity of the riparian areas in Town)
112. Add a policy for wastewater recycling, at least for use on landscaping. (neutral)

113. Add a policy to create a Town-wide wildlife corridor study that researches where movement corridors exist and what structures are already infringing upon or helping habitat and movement (e.g. fences, buildings, structures, culverts, roads, and lighting). *(neutral)*
114. Develop a new Implementation Program under Policy ENV-6.3 to develop a Town-wide riparian setback policy with specific development standards near riparian corridors. *(not recommended as a standard buffer or setback would not reflect the varying character and sensitivity of the riparian areas in Town)*
115. Revise Environment and Sustainability Element Implementation Program K Riparian Corridor Lighting to state, “Establish a lighting setback policy for riparian corridors to protect these sensitive ecological areas and to maximize the distance between nighttime lighting and the corridor. No light should be placed in or directed towards the riparian corridor.” ~~Require careful lighting design in and near natural riparian corridors to direct light away and to maximize the distance between nighttime lighting and the corridor.”~~ *(not recommended)*
116. Addition of a new plant-based eating education program to Implementation Programs in Section 8.12: “Plant Based Education: Implement programs to educate and support residents about the benefits of shifting to a plant-based diet, which includes improved health, curbing greenhouse gas emissions, reducing biodiversity loss and deforestation, reducing water usage, and reversing pollution of our air, land, and water.” *(neutral)*

Hazards and Safety Element:

117. Explain within Section 9.2 of the Hazards and Safety Element that according to CALFIRE, 95 percent of all fires are caused by people (e.g., arson, escaped debris burns, and equipment use) and this is why “Fires that occur along the wildland-urban interface (WUI) are much more of a hazard...” It is also important to note that a high fire hazard severity zone does not describe the risk of a fire start, but rather describes potential impacts to natural ecosystems, known as fire severity. *(neutral)*
118. Add mandate that overhead utilities be undergrounded to reduce fire risks, especially in the hillsides. *(not recommended, undergrounding is included in other Town policies and regulations)*
119. Revise the discussion regarding dam inundation in Section 9.4 – Flood and Inundation Hazards to note that the Town of Los Gatos is also within the inundation area of Vasona Dam. *(neutral)*

Additional actions suggested in Public Comments:

120. Have a vote or poll of residents on the proposed changes in the Draft 2040 General Plan. *(comment noted)*
121. Request an exception to the RHNA requirement. *(the deadline has passed)*
122. Update Housing Element with the 2040 General Plan Land Use and Community Design Elements. *(comment noted)*

123. Conduct a Fiscal Impact Analysis to estimate the fiscal impacts of full buildout of the 2040 General Plan. *(on April 5, 2022, Town Council decided not to conduct additional fiscal impact analyses)*