CITY COUNCIL MEETING - AMENDED 1/20/23

AGENDA

7:00 PM - Tuesday, January 24, 2023

via Videoconference and In Person

Please Note: The City Council will meet in person as well as via Telephone/Video Conference

Telephone: 1-669-444-9171 / Webinar ID: 865 2725 6820

https://losaltosca-gov.zoom.us/j/86527256820?pwd=alZ3MzdFdVFZdkt1Wk1HTXd5VkgrUT09

Passcode: 555735

TO PARTICIPATE IN-PERSON: Members of the public may also participate in person by being present at the Los Altos Council Chamber at Los Altos City Hall located at 1 N. San Antonio Rd, Los Altos, CA.

TO PARTICIPATE VIA VIDEO: Follow the link above. Members of the public will need to have a working microphone on their device and **must have the latest version of ZOOM installed** (available at https://zoom.us/download). To request to speak, please use the "Raise hand" feature located at the bottom of the screen.

TO PARTICPATE VIA TELEPHONE: Members of the public may also participate via telephone by calling the number listed above. To request to speak, press *9 on your telephone.

TO SUBMIT WRITTEN COMMENTS: Prior to the meeting, comments on matters listed on the agenda may be emailed to *PublicComment@losaltosca.gov*. Emails sent to this email address are sent to/received immediately by the City Council. Please include a subject line in the following format:

PUBLIC COMMENT AGENDA ITEM ## - MEETING DATE

Correspondence submitted in hard copy/paper must be received by 2:00 PM on the day of the meeting to ensure distribution prior to the meeting. Correspondence received prior to the meeting will be included in the public record.

Public testimony will be taken at the direction of the Mayor, and members of the public may only comment during times allotted for public comments.

AGENDA

CALL MEETING TO ORDER

ESTABLISH QUORUM

PLEDGE ALLEGIANCE TO THE FLAG

REPORT ON CLOSED SESSION

CHANGES TO THE ORDER OF THE AGENDA

PUBLIC COMMENTS ON ITEMS NOT ON THE AGENDA

Members of the audience may bring to the Council's attention any item that is not on the agenda. Speakers are generally given two or three minutes, at the discretion of the Mayor. Please be advised that, by law, the City Council is unable to discuss or take action on issues presented during the Public Comment Period. According to State Law (also known as "The Brown Act") items must first be noted on the agenda before any discussion or action.

1. PC, Items not on Agenda

SPECIAL ITEMS

A. Introduction of New Capitol Improvement Projects Manager Franklin Wong

B. Recognition of Emergency Workers

C. Recognition of Outgoing 2022 Commissioners

D. Climate Action and Adaptation Plan Award

E. Proclamation Celebrating Martin Luther King Jr. Day

F. Proclamation Celebrating 2023 Lunar New Year

CONSENT CALENDAR

These items will be considered by one motion unless any member of the Council or audience wishes to remove an item for discussion. Any item removed from the Consent Calendar for discussion will be handled at the discretion of the Mayor.

1. **Response to the Santa Clara County Civil Grand Jury Report: *Show Me the Money: Financial Transparency Needed***: Approve the draft response to the Santa Clara County Civil Grand Jury Report: *Show Me the Money: Financial Transparency Needed* (J. Maginot)

2. **Minutes:** Approve Minutes of the City Council Regular Meeting of January 10, 2023. (A. Rodriguez)

PUBLIC HEARINGS

3. **Sixth Cycle Housing Element 2023-2031:** A Resolution of the City Council of the City of Los Altos, California, adopting the Mitigated Negative Declaration (MND), based on its independent analysis that MND was completed in compliance with the California Environmental Quality Act (CEQA); find that there is no substantial evidence that the project will have a significant effect on the environment; and that the MND reflects the City's independent judgment and analysis; approving the 2023-2031 Housing Element of the City's General Plan; and Authorizing the Development Services Director to submit the Housing Element to the California Department of Housing and Community Development (HCD) for its consideration and certification.

DISCUSSION ITEMS

4. **Affirm 2023 Council Commission and Committee Assignments:** Pursuant to City Council Norms and Procedures, Affirm Mayor appointment to the Santa Clara County Library District JPA

INFORMATIONAL ITEMS ONLY

5. Tentative Council Calendar

6. Independent Intake Official (IIO) Yearly Report

COUNCIL/STAFF REPORTS AND DIRECTIONS ON FUTURE AGENDA ITEMS

ADJOURNMENT

(Council Norms: It will be the custom to have a recess at approximately 9:00 p.m. Prior to the recess, the Mayor shall announce whether any items will be carried over to the next meeting. The established hour after which no new items will be started is 11:00 p.m. Remaining items, however, may be considered by consensus of the Council.)

SPECIAL NOTICES TO THE PUBLIC

In compliance with the Americans with Disabilities Act, the City of Los Altos will make reasonable arrangements to ensure accessibility to this meeting. If you need special assistance to participate in this meeting, please contact the City Clerk 72 hours prior to the meeting at (650) 947-2610.

Agendas Staff Reports and some associated documents for City Council items may be viewed on the Internet at *http://www.losaltosca.gov/citycouncil/online/index.html*.

All public records relating to an open session item on this agenda, which are not exempt from disclosure pursuant to the California Public Records Act, and that are distributed to a majority of the legislative body, will be available for public inspection at the Office of the City Clerk's Office, City of Los Altos, located at One North San Antonio Road, Los Altos, California at the same time that the public records are distributed or made available to the legislative body.

If you wish to provide written materials, please provide the City Clerk with 10 copies of any document that you would like to submit to the City Council for the public record.

PUBLIC CORRESPONDENCE

The following is public correspondence received by the City Clerk's Office after the posting of the original agenda. Individual contact information has been redacted for privacy. This may *not* be a comprehensive collection of the public correspondence, but staff makes its best effort to include all correspondence received to date.

To send correspondence to the City Council, on matters listed on the agenda please email PublicComment@losaltosca.gov

From: Bill Hough
To: Public Comment; City Council
Subject: Public comment on items not on the January 24 agenda
Date: Sunday, January 22, 2023 3:39:00 PM

In the January 12 issue of the *Palo Alto Daily Post*, Braden Cartwright reported that, for questionable reasons, removed Council Member Lee Eng from several regional boards and committees. It is difficult for this resident to believe that is not payback for Lee Eng's refusal to bow to the woke mob in 2021.

Because of the majority's vindictiveness, the residents are hurt by the loss of intuitional memory, as new board members waste time on a learning curve. This could have avoided if Lee Eng had not been removed from her assignments. Shame on you.

Bill Hough
Los Altos resident and taxpayers

Proclamation

Of the Mayor
Of the City of Los Altos, California

WHEREAS, the Civil Rights movement of the 1960's has profoundly impacted the course of American history and continues to shape the direction and debate of our society; and

WHEREAS, Dr. Martin Luther King, Jr's dreams of equality and achieving social change through nonviolence have helped shape our nation; and

WHEREAS, we remember his legacy as an American hero and tireless social activist, who called upon our nation to ensure equal justice under the law, upholding our founding principles which recognize individual rights to life, liberty, and the pursuit of happiness; and

WHEREAS, Dr. King encouraged Americans to come together, regardless of age, race, or creed, to strengthen their communities, alleviate poverty, and value the dignity and respect inherent in all people; and

WHEREAS, as we look forward to the future with optimism—inspired by Dr. King's legacy and informed by his wisdom and vision—let us rededicate ourselves to keeping his dream alive and be reminded that we are united together as one community;

NOW THEREFORE I, Sally Meadows, Mayor of the City of Los Altos, and on behalf of the Los Altos City Council, do hereby recognize January 16, 2023 in Los Altos as Martin Luther King, Jr. Day.

IN WHITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the City of Los Altos this 24th day of January 2023.

Sally Meadows, MAYOR

Proclamation

Of the Mayor
Of the City of Los Altos, California

WHEREAS, the Lunar New Year is the most significant holiday in many Asian and Pacific Islander cultures, with 2023 being the Year of the Rabbit; and

WHEREAS, this tradition has been observed for centuries throughout different Asian and Pacific Islander (AAPI) cultures, and in countries including China, the Koreas, Vietnam, and the Philippines among others; and

WHEREAS, this occasion is an opportunity to recognize the heritage and history of the AAPI community who celebrate the Lunar New Year; and

WHEREAS, amid the shameful increase in Anti-Asian hate across the country, we must continue to call out past and present racism and fight for the safety and inclusion of these communities; and

WHEREAS, in observance of Lunar New Year, we express our deepest respect for Asian Americans and all individuals throughout the world who celebrate this significant occasion; and

WHEREAS, we wish happiness, prosperity, fortune and good health in the Year of the Rabbit to those who celebrate;

NOW THEREFORE I, Sally Meadows, Mayor of the City of Los Altos, and on behalf of the Los Altos City Council, do hereby recognize January 22, 2023 in Los Altos as the start of Lunar New Year in 2023.

I have hereunto set my hand and affixed the seal of the City of Los Altos this 24th day of January 2023

Sally Meadows, MAYOR

AGENDA REPORT SUMMARY

Meeting Date: January 24, 2023

Subject Response to the Santa Clara County Civil Grand Jury Report: *Show Me the Money: Financial Transparency Needed*

Prepared by: Jon Maginot, Assistant City Manager
Approved by: Gabriel Engeland, City Manager

Attachment(s):
1. Response to Santa Clara County Civil Grand Jury Report: *Show Me the Money: Financial Transparency Needed*
2. Santa Clara County Civil Grand Jury Report: *Show Me the Money: Financial Transparency Needed*

Initiated by:
Staff

Previous Council Consideration:
None

Fiscal Impact:
None

Environmental Review:
Not applicable

Policy Question(s) for Council Consideration:
- Do the responses contained in the attached report adequately address the Findings and Recommendations contained in the Santa Clara County Civil Grand Jury Report: *Show Me the Money: Financial Transparency Needed*?

Summary:
- The 2022 Santa Clara County Civil Grand Jury has reviewed the wording of various ballot questions and provided its findings and recommendations to the City. A response to the findings and recommendations of the Grand Jury is required by State law.

Reviewed By:

City Manager	City Attorney	Finance Director
GE	JH	JD

Subject: Response to the Santa Clara County Civil Grand Jury Report: *Show Me the Money: Financial Transparency Needed*

Staff Recommendation:
Approve the draft response to the Santa Clara County Civil Grand Jury Report: *Show Me the Money: Financial Transparency Needed*

Subject: Response to the Santa Clara County Civil Grand Jury Report: *Show Me the Money: Financial Transparency Needed*

Purpose
Review and approve or modify the draft responses prepared by staff to the Santa Clara County Civil Grand Jury Report: *Show Me the Money: Financial Transparency Needed.*

Background
In accordance with Section 933 of the California Penal Code, public agency governing bodies are required to comment on Grand Jury Findings and Recommendations no later than 90 days after the Grand Jury submits a final report.

The Santa Clara County Civil Grand Jury submitted its report entitled *Show Me the Money: Financial Transparency Needed* on December 14, 2022.

Discussion/Analysis
The 2022 Santa Clara County Civil Grand Jury has reviewed financial practices of the County's General Law Cities as they relate to Government Code Section 41004. The City's draft response is included as Attachment 1.

Recommendation
The staff recommends Council approve the draft response.

1 North San Antonio Road
Los Altos, California 94022-3087

M E M O R A N D U M

DATE: January 24, 2023

TO: The Honorable Beth McGowen, Presiding Judge, Santa Clara County Superior Court

FROM: Gabe Engeland, City Manager

SUBJECT: **RESPONSE TO THE 2022 SANTA CLARA COUNTY CIVIL GRAND JURY REPORT "*SHOW ME THE MONEY: FINANCIAL TRANSPARENCY NEEDED*"**

The City of Los Altos submits the following specific responses as requested on page 15 of the 2022 Santa Clara County Civil Grand Jury Report "Show me the money: Financial transparency needed" related to the Findings and Recommendations set forth in the Report.

Findings and Recommendations

Finding 1:
The City of Los Altos is not submitting monthly treasurer's reports in compliance with California Government Code Section 41004.

Response 1:
Respondent, City of Los Altos, disagrees with the finding that the City is not in compliance with California Government Code section 41004.

Respondent notes that Government Code Section 41004 does not specify the manner in which the city treasurer is to provide the treasurer's report. Respondent clarifies that the City does not contend that Government Code Section 37208 indemnifies it from complying with Government Code Section 41004; rather, the City referred to Section 37208 during the investigation as providing alternate means for the City Council to audit and ratify warrants. Respondent also notes that during the Civil Grand Jury's investigation, the City informed the Grand Jury that while the City believes it is in compliance with Government Code Section 41004, the City is willing to provide the report in the format the Grand Jury recommends.

Finally, respondent notes that while the Grand Jury appears to have been willing to work with another city to produce reports in a form and manner desired by the Grand Jury City of Los Altos was not afforded the same opportunity, which is disappointing given the City's stated willingness to do the same.

Recommendation 1:
The City of Los Altos should comply with Government Code section 41004 by submitting monthly treasurer's reports that include monthly disbursements, receipts, and fund balances and by filing those reports with the City. This recommendation should be implemented by March 15, 2023.

Response 1:
Respondent, City of Los Altos, finds the recommendation is not warranted; however, as stated previously in the City's response to Finding 1 and as indicated by the City to the Grand Jury, City is willing to provide reports in the manner desired by the Grand Jury.

Finding 2:
The City of Los Altos does not produce treasurer's reports in compliance with California Government Code section 41004. The reason for non-compliance was that the City of Los Altos' financial policy does not require the preparation and submission of treasurer's reports. It is an erroneous belief that internal policies excuse compliance with Government Code Section 41004.

Response 2:
Respondent, City of Los Altos, disagrees with the finding that the City is not incompliance with Government Code Section 41004. Respondent further disagrees with the finding that the City believes that internal policies excuse compliance with any State Law.

Recommendation 2:
The City of Los Altos should amend its financial policy to require that monthly treasurer's reports be prepared and submitted in accordance with California Government Code section 41004 by March 15, 2023.

Response 2:
Respondent, City of Los Altos, finds the recommendation is not warranted. The City of Los Altos will not update its financial policy as recommended.

SHOW ME THE MONEY:
FINANCIAL TRANSPARENCY NEEDED

2022 Santa Clara County
Civil Grand Jury

December 14, 2022

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GLOSSARY AND ABBREVIATIONS

Government Code, Section 41004	California Government Code section 41004 states: "Regularly, at least once each month, the city treasurer shall submit to the city clerk a written report and accounting of all receipts, disbursements, and fund balances. The city treasurer shall file a copy with the legislative body."
Treasurer's Reports	The reports required by Government Code section 41004 may have various styles and titles. For purposes of this report, the Civil Grand Jury will refer to these reports throughout as "treasurer's reports."
Charter City	Article XI, section 3(a) of the California Constitution authorizes the adoption of a city charter and provides that the charter has the force and effect of state law. Article XI, section 5(a), the "home rule" provision, grants to charter cities the ability to govern over "municipal affairs." There are six charter cities in Santa Clara County: San José, Palo Alto, Santa Clara, Sunnyvale, Gilroy, and Mountain View.
General Law City	A general law city may only have a form of government authorized by state general law. A city that has not adopted a charter is bound by the state's general laws even with respect to municipal affairs. There are nine general law cities and towns in Santa Clara County: Los Altos, Los Altos Hills, Los Gatos, Milpitas, Campbell, Monte Sereno, Cupertino, Saratoga and Morgan Hill. The scope of this investigation is limited to general law cities.
GAAP	Generally Accepted Accounting Principles: a set of accounting rules and standards established by the accounting industry.

SUMMARY

General law cities in California are required to comply with California Government Code section 41004 (Section 41004), which states, "at least once each month, the city treasurer shall submit to the city clerk a written report and accounting of all receipts, disbursements, and fund balances. The city treasurer shall file a copy with the legislative body." The benefit of the law is to ensure financial accountability and public transparency as well as to foster better fiscal affairs. Treasurer's reports provide city councils with timely and accurate financial information necessary to make reliable and sound decisions.

The 2022 Santa Clara County Civil Grand Jury (Civil Grand Jury) found that there is widespread noncompliance with this state requirement throughout Santa Clara County (County) by the general law cities. As of the date of this report, six of the nine general law cities[1] in the County are noncompliant with this state law: Los Altos, Los Altos Hills, Los Gatos, Milpitas, Campbell, and Monte Sereno. Additionally, the City of Cupertino was initially noncompliant until the city took corrective action during the Civil Grand Jury's investigation. The City of Saratoga and City of Morgan Hill were the only two cities compliant prior to the investigation.

Based on responses from city officials, the Civil Grand Jury determined that there is a widespread misunderstanding among these general law cities in the County regarding Section 41004 reporting requirements. The Civil Grand Jury recommends that the noncompliant cities – Los Altos, Los Altos Hills, Los Gatos, Milpitas, Campbell, and Monte Sereno – comply with Section 41004.

[1] The Town of Los Altos Hills and the Town of Los Gatos are general law cities.

BACKGROUND

The State Legislature established the office of city treasurer by enactment of California Government Code, Title 4 - Government of Cities, Division 3 - Other Officers, Chapter 3 - City Treasurer. The statutory duties for city treasurers may generally be found in the following sections:

> Section 41001: The city treasurer shall receive and safely keep all money the treasurer receives.
>
> Section 41002: (a) The city treasurer shall comply with all laws governing the deposit and securing of public funds and the handling of trust funds in their possession; and (b) if the city has issued bonds, the city treasurer shall use a system of accounting and auditing that adheres to generally accepted accounting principles.
>
> Section 41003: The city treasurer shall pay out money only on warrants signed by legally designated persons.
>
> Section 41004: Regularly, at least once each month, the city treasurer shall submit to the city clerk a written report and accounting of all receipts, disbursements, and fund balances. The city treasurer shall file a copy with the legislative body.

Pursuant to California Government Code section 36502, the city treasurer is an elective office. California Government Code section 36508 and California Elections Code section 9222 permit cities to submit to the electors the question of whether the city treasurer position should be an appointive office. In that instance, the financial duties assigned by the state statutes to the city treasurer are transferred from an elected treasurer to an appointed officer if approved by the electorate. Only one general law city in the County, Morgan Hill, continues to have an elected city treasurer, who serves for four years. All other cities in the County have opted to assign city treasurer duties to senior administrative staff.

METHODOLOGY

Upon receiving a complaint regarding Government Code section 41004 noncompliance in Cupertino, the Civil Grand Jury decided to expand the investigation to review all nine general law cities in the County: Los Altos, Los Altos Hills, Los Gatos, Milpitas, Campbell, Monte Sereno, Cupertino, Saratoga, and Morgan Hill. From March to August 2022, the Civil Grand Jury began the process by polling these Cities to determine if they produced treasurer's reports.

The Civil Grand Jury took the following steps:

- Contacted a total of 22 officials across nine cities who were responsible for tasks relevant to the topic of this report.
- Reviewed relevant sections of the California Government Code, California Elections Code, and examined the ordinances, policies, and memos of each city relevant to their city treasurer duties.
- Reviewed published city council and city committee agendas relevant to Section 41004.
- Reviewed other relevant city documents, including but not limited to financial audits, city organizational charts, and relevant job descriptions.
- Verified the six most recent treasurer's reports of each city, if submitted.

The Civil Grand Jury inspected the contents of each report to verify the inclusion of the required elements: monthly disbursements, receipts, and fund balances. The Civil Grand Jury also determined whether the reports were published at least once each month to be compliant with Section 41004.

It should be noted that most cities do not call their report "Treasurer's Report." Appendix A provides links to examples of compliant Section 41004 reports, showcasing variations in terms of report name, style, layout, and appearance.

The Civil Grand Jury used the 2011-2012 Solano County Civil Grand Jury report entitled "City Treasurer Functional Review" as a reference for this report.

INVESTIGATION

All interviews and email correspondence were designed to determine if general law cities complied with Section 41004. To be deemed compliant, a city must produce a financial document at least once each month that details all of the following: monthly disbursements, receipts, and fund balances – and must be filed with the legislative body. Six months of reports were requested to verify an existing track record. Data collection and verification took place from March to July 2022.

The results of this investigation are depicted in Table 1 below.

Table 1. Section 41004 Compliance Among Nine General Law Cities

City/Town	Compliant	Noncompliant
Los Altos		X
Los Altos Hills		X
Los Gatos		X
Milpitas		X
Campbell		X
Monte Sereno		X
Cupertino		X*
Saratoga	X	
Morgan Hill	X	

*During the investigation, Cupertino started complying with Section 41004.

There are a number of reasons for cities' noncompliance:

- Some cities were under the impression that the Section 41004 mandate was a discretionary guideline.
- Others adopted the practice of other cities that did not produce the requisite monthly reports.

However, the primary error among the cities was that they produced abbreviated reports that omitted required information such as receipts, disbursements, and fund balances. Some of the deficient reports lacked substance, with abbreviated information presented without context or details.

The Civil Grand Jury believes there is no fiscal impact involved in complying with Section 41004. Outside resources should not be required since existing staff already make some financial reports, collect this type of data, and should be able to produce treasurer's reports. Therefore, each of the deficient cities can be compliant with minimal effort or burden.

Noncompliant Cities and Towns

Los Altos

The City of Los Altos does not have an elected city treasurer. Further, the Los Altos Municipal Code does not specifically state which official performs the duties of a city treasurer. Los Altos Municipal Code Section 2.01.060, however, provides that the city manager is the administrative head of the city and is specifically empowered "keep the council at all times fully advised as to the financial condition and needs of the city." In the City of Los Altos, monthly treasurer's reports are not prepared and submitted to the city clerk in accordance with Section 41004.

At the time of the Civil Grand Jury inquiry in June 2022, the City of Los Altos did not submit any treasurer's reports. According to the City of Los Altos, Government Code section 37208 indemnified them from the Section 41004 mandate. However, the language of Government Code Section 37208 refers to payroll warrants or checks and makes no mention of the reporting required by Section 41004, which requires a report of "receipts, disbursements and general fund balances." Moreover, the language of Government Code Section 37208 neither excuses a city from complying with Section 41004 nor makes any reference to Section 41004.

Further, the city erroneously noted that its Generally Accepted Accounting Principles (GAAP) policy on financial reporting excused noncompliance with Section 41004 reporting requirements. In 2015, the city adopted a "Financial Policy" that reads in part, "The city's accounting and financial reports are to be maintained in accordance with GAAP." GAAP accounting does not address the Section 41004 mandated requirements.

The Civil Grand Jury determined that the City of Los Altos does not produce treasurer's reports and thus is noncompliant.

Los Altos Hills

The Town of Los Altos Hills does not have an elected city treasurer. The town's Municipal Code is silent on who performs the duties of the treasurer; however, the Civil Grand Jury learned that the treasurer responsibilities fall to the director of administrative services.

The Civil Grand Jury received monthly treasurer's reports in June 2022. Upon inspection, however, they contained only disbursements and lacked receipts as well as fund balances; thus the reports are incomplete and noncompliant.

Los Gatos

The Town of Los Gatos does not have an elected city treasurer. The town's Municipal Code Section 2.30.035 delegates the responsibility of the treasurer and the ability to assign those duties to the town manager. The director of finance is responsible for the town's financial matters. The Town of Los Gatos produces quarterly reports, not monthly reports as required by Section 41004. While the disbursements, receipts, and fund balances are in the reports, they must be published at least once each month to comply with Section 41004. Because the production intervals are quarterly, the Town of Los Gatos is not in compliance.

Milpitas

The City of Milpitas does not have an elected city treasurer. Milpitas Municipal Code section VI-1-3.02 vests the duties of a city treasurer with the city manager, who is empowered to appoint a city treasurer pursuant to Section VI-1-3.04. In the City of Milpitas, the finance director produces weekly disbursement reports, quarterly receipt and investment reports for the general and special districts' funds, and annual reports for all other reporting.

At the time of inquiry in June 2022, the Civil Grand Jury noted well-prepared reports. However, the frequency of report submission does not meet Section 41004 criteria, which requires monthly reports. Reports showing all receipts, disbursements, and fund balances must be filed with the city clerk at least once each month. Due to submission infrequency, the City of Milpitas is not in compliance.

Campbell

In November of 2010, voters in the City of Campbell approved Measure O, which changed the office of the city treasurer (and city clerk) from an elected to an appointed office. The City of

Campbell's Municipal Code is silent on who has officially assumed those duties.[2] The Civil Grand Jury learned that the city's finance director has the responsibilities of a treasurer and oversees the preparation of financial reports. The reports are prepared by the accounting clerk, reviewed by the finance manager and the finance director, and approved by the city manager for inclusion in the council packet.

At the time of inquiry in June 2022, 21 reports were submitted. The submitted documents had no payroll records and accounts payable balances with paid or disbursed funds. Additionally, the required information was not published at least once each month.

The City of Campbell's submitted reports do not comply with Section 41004 because disbursements, receipts, and balances are not filed at least once each month.

Monte Sereno

The City of Monte Sereno does not have an elected city treasurer. The Monte Sereno Municipal Code section 2.04.010 designates the city manager as the director of finance and tasks the city manager with "performing all duties of City treasurer as set forth in Government Code sections 41000 et seq." At the time of inquiry in June 2022, six treasurer's reports were received by the Civil Grand Jury. While the reports did contain the required fund balances, the receipts and disbursements were not compliant with the Section 41004 requirement.

Compliant Cities

Cupertino

The City of Cupertino does not have an elected city treasurer. The City of Cupertino's Municipal Code section 2.24.030 states:

> The treasurer shall make monthly reports which conform to the requirements of Government Code Section 41004. Said reports shall be delivered to the City Council, city manager and made available for review by such other persons who may so request.

Until 2022, no staff member for the City of Cupertino had been preparing and delivering a monthly treasurer's report to the Cupertino City council. However, during the Civil Grand Jury's

[2] The City of Campbell's Municipal Code does not appear to have been updated. The City of Campbell's Municipal Code section 2.08.010 still states that the elected officers shall be those designated by general laws, which includes a city treasurer. Further, the code has other references to an elected city treasurer. (See Sections 2.16.040 [city treasurer compensation] and 2.16.010 [establishment of salaries].)

investigation, the belated monthly treasurer's reports for January and February 2022 were published and placed on the Cupertino Audit Committee agenda.

The Civil Grand Jury recognizes the action taken by the City of Cupertino as soon as it was brought to their attention. The City of Cupertino is now compliant with Section 41004 as of March 2022, despite the stated history of not submitting the required reports.

Saratoga

The City of Saratoga does not have an elected city treasurer. The City of Saratoga Municipal Code section 2-20.035 states that the city manager shall serve as the city treasurer and be responsible for "other duties and responsibilities as required by law to be performed by the City Treasurer." Thus, the city manager is responsible for the preparation and submission of monthly treasurer's reports.

The Civil Grand Jury verified in June 2022 that regular monthly treasurer's reports are filed with the City of Saratoga and are fully compliant with Section 41004. These reports can also be found by the public on the city's website. An example is shown in Appendix A.

Morgan Hill

The City of Morgan Hill has an elected city treasurer. The treasurer, in conjunction with the finance director, prepares the treasurer's reports.

The Civil Grand Jury verified in June 2022 that regular monthly treasurer's reports are produced. The reports contain all the required components of disbursements, receipts, and fund balances. Thus, the City of Morgan Hill is compliant with Section 41004. A compliant Morgan Hill treasurer's report is shown in Appendix A.

CONCLUSION

Within the County, there is widespread noncompliance with California Government Code section 41004 by the general law cities. The Civil Grand Jury commends the cities of Saratoga and Morgan Hill for being in full compliance and notes the City of Cupertino's quick action to become compliant. The Civil Grand Jury recommends that the noncompliant cities of Los Altos, Los Altos Hills, Los Gatos, Milpitas, Campbell, and Monte Sereno comply with Section 41004. This is to be done by producing treasurer's reports at least once each month containing the required disbursements, receipts, and fund balance information. The benefit of implementing this recommendation overshadows any limited cost impact since existing staff could compile the report. In short, there is great benefit in producing these reports, as they improve financial transparency to the residents of the cities.

FINDINGS AND RECOMMENDATIONS

It is recommended that noncompliant cities start producing treasurer's reports as required by law. Some cities produce abbreviated information that does not include requisite financial information as defined in state Government Code section 41004. Some cities produce requisite reports, but not on a monthly basis.

Finding 1
The City of Los Altos is not submitting monthly treasurer's reports in compliance with California Government Code section 41004.

Recommendation 1
The City of Los Altos should comply with Government Code section 41004 by submitting monthly treasurer's reports that include monthly disbursements, receipts, and fund balances and by filing those reports with the city. This recommendation should be implemented by March 15, 2023.

Finding 2
The City of Los Altos does not produce treasurer's reports in compliance with California Government Code section 41004. The reason provided for non-compliance was that the City of Los Altos' financial policy does not require the preparation and submission of treasurer's reports. It is an erroneous belief that internal policies excuse compliance with Government Code section 41004.

Recommendation 2
The City of Los Altos should amend its financial policy to require that monthly treasurer's reports be prepared and submitted in accordance with California Government Code section 41004 by March 15, 2023.

Finding 3
The Town of Los Altos Hills produces monthly treasurer's reports but the content of those reports lacks monthly disbursements, receipts, and fund balances required by California Government Code section 41004.

Recommendation 3
The Town of Los Altos Hills should update their existing monthly reports to include monthly disbursements, receipts, and fund balances by March 15, 2023.

Finding 4
The Town of Los Gatos produced reports that contain the required content but does not produce the treasurer's reports on a monthly basis as required by California Government Code section 41004.

Recommendation 4
The Town of Los Gatos should produce its reports on a monthly basis to comply with California Government Code section 41004 by March 15, 2023.

Finding 5
The City of Milpitas does not produce monthly treasurer's reports as required by California Government Code section 41004.

Recommendation 5
The Civil Grand Jury recommends that the City of Milpitas comply with California Government Code section 41004 by producing monthly treasurer's reports that include monthly disbursements, receipts, and fund balances by March 15, 2023.

Finding 6
The City of Campbell does not produce monthly treasurer's reports as required by California Government Code section 41004.

Recommendation 6
The City of Campbell should comply with California Government Code section 41004 by producing monthly treasurer's reports that include monthly disbursements, receipts, and fund balances by March 15, 2023.

Finding 7
The City of Monte Sereno does not produce monthly treasurer's reports as required by California Government Code section 41004.

Recommendation 7
The City of Monte Sereno should comply with California Government Code section 41004 by producing monthly treasurer's reports that include monthly disbursements, receipts, and fund balances by March 15, 2023.

Finding 8
When the Civil Grand Jury began this investigation, the City of Cupertino was not in compliance with California Government Code section 41004. However, starting in March 2022, the City of Cupertino began producing treasurer's reports compliant with Section 41004.

Recommendation 8
The City of Cupertino should maintain compliance with California Government Code section 41004. Continued compliance is recommended.

Finding 9
The Civil Grand Jury commends the City of Saratoga for producing monthly treasurer's reports that include disbursements, receipts, and fund balances. The City of Saratoga is in full compliance with California Government Code section 41004.

Recommendation 9
No recommendation.

Finding 10
The Civil Grand Jury commends the elected city treasurer for producing monthly treasurer's reports that include monthly disbursements, receipts, and fund balances. The City of Morgan Hill is in full compliance with California Government Code section 41004.

Recommendation 10
No recommendation.

REQUIRED RESPONSES

Pursuant to California Penal Code section 933(b) et seq. and California Penal Code section 933.05, the Civil Grand Jury requests responses from the following governing bodies:

Responding Agency	Findings	Recommendations
City of Los Altos	1, 2	1, 2

Responding Agency	Findings	Recommendations
Town of Los Altos Hills	3	3

Responding Agency	Findings	Recommendations
Town of Los Gatos	4	4

Responding Agency	Findings	Recommendations
City of Milpitas	5	5

Responding Agency	Findings	Recommendations
City of Campbell	6	6

Responding Agency	Findings	Recommendations
City of Monte Sereno	7	7

Responding Agency	Findings	Recommendations
City of Cupertino	8	8

Responding Agency	Findings	Recommendations
City of Saratoga	9	

Responding Agency	Findings	Recommendations
City Treasurer of Morgan Hill	10	

APPENDIX A: EXAMPLES OF COMPLIANT TREASURER'S REPORTS

On the following pages are two examples of monthly treasurer's reports that contain the required disbursements, receipts, and starting and ending fund balances and are therefore compliant with California Government Code section 41004. They are included to show that there are various names and formats that the reports may take. Following the examples are links to the full reports for ease of access.

Example 1. Page 3 of 7 from Saratoga August 2022 Treasurer's Report

TABLE 1: CHANGES IN TOTAL FUND BALANCE

Fund Description	Prior Year Carryforward 7/1/2022	Increase/ (Decrease) July	Current Revenue	Current Expenditure	Transfer In	Transfer Out	Fund Balance 8/31/2022*	
General Fund								
Restricted Fund Balances:								
Environmental Services Reserve	63,182	-	-	-	-	-	63,182	
Committed Fund Balances:								
Hillside Stability Reserve	1,000,000	-	-	-	-	-	1,000,000	
Assigned Fund Balances:								
Future Capital Replacement & Efficiency Project Reserve	2,796,663	-	-	-	-	-	2,796,663	
Carryforwards Reserve	20,850	-	-	-	-	-	20,850	
Facility Reserve	3,700,000	-	-	-	-	-	3,700,000	
Unassigned Fund Balances:								
Working Capital Reserve	1,000,000	-	-	-	-	-	1,000,000	
Fiscal Stabilization Reserve	3,150,000	-	-	-	-	-	3,150,000	
Compensated Absences Reserve	331,481	-	-	-	-	-	331,481	
Other Unassigned Fund Balance Reserve (Pre YE distribution)	3,348,282	(602,197)	682,632	(1,063,288)	-		2,365,429	
General Fund Total	15,410,458	(602,197)	682,632	(1,063,288)	-	-	14,427,605	
Special Revenue								
Landscape/Lighting Districts	977,231	-	44	(15,943)	-	-	961,331	
ARPA Federal Grants	7,127,589	-	-	-	-	-	7,127,589	
Special Revenue Fund Total	8,104,820	-	44	(15,943)	-	-	8,088,920	
Debt Service								
Library Bond	805,311	(714,893)	3,312	-	-	-	93,730	
Arrowhead Bond	481,242	(774)	-	(68,767)	-	-	411,701	
Debt Service Fund Total	1,286,554	(715,667)	3,312	(68,767)	-	-	505,431	
Internal Service Fund								
Liability/Risk Management	641,403	(759,998)	517	(6,948)	-	-	(125,027)	**
Workers Compensation	232,829	(2,185)	-	(54,431)	-	-	176,212	
Office Support Fund	155,443	149	890	(2,027)	-	-	154,456	
Information Technology Services	661,159	(30,693)	-	(98,942)	-	-	531,525	
Vehicle & Equipment Maintenance	278,317	(5,541)	-	(20,466)	-	-	252,310	
Building Maintenance	764,302	(22,267)	-	(60,637)	-	-	681,398	
Vehicle & Equipment Replacement	1,201,979	-	-	-	-	-	1,201,979	
Technology Replacement	798,337	-	-	-	-	-	798,337	
Facility FFE Replacement	1,012,136	-	-	-	-	-	1,012,136	
Internal Service Fund Total	5,745,905	(820,535)	1,407	(243,452)	-	-	4,683,326	
Trust/Agency								
WVCWP Agency Fund	558,655	(29,955)	-	(41,044)	-	-	487,656	
Trust/Agency Fund Total	558,655	(29,955)	-	(41,044)	-	-	487,656	
Capital Project								
Street Projects	3,381,066	(34,069)	50,747	(355,438)	-	-	3,042,306	
Park and Trail Projects	849,562	-	-	(4,143)	-	-	845,419	
Facility Projects	623,475	4,458	-	(53,643)	-	-	574,289	
Administrative Projects	1,429,921	7,042	8,205	(290)	-	-	1,444,879	
Tree Fund Projects	52,541	-	-	-	-	-	52,541	
Park In-Lieu Projects	1,172,555	-	-	-	-	-	1,172,555	
CIP Grant Street Projects	(46,912)	-	-	-	-	-	(46,912)	**
CIP Grant Park & Trail Projects	-	-	100,000	-	-	-	100,000	
CIP Grant Administrative Projects	(164,574)	-	-	-	-	-	(164,574)	**
CIP Grant ARPR/SLFRF Projects	-	-	-	(142,725)	-	-	(142,725)	**
Gas Tax Fund Projects	247,731	-	126,140	-	-	-	373,871	
CIP Fund Total	7,545,366	(22,570)	285,092	(556,240)	-	-	7,251,649	
Total City	**38,651,757**	**(2,190,923)**	**972,487**	**(1,988,733)**	**-**	**-**	**35,444,587**	

*Fund balances are unaudited, and may not include all necessary adjustments. These figures will be updated in future reports once the FY 2021/22 independent audit is completed.
**Negative fund balance due to authorized spending of anticipated revenues

https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/1578630/Treasurer_Report_for_August_2022.pdf

Example 2. Page 12 of 21 from Morgan Hill March 2022 Financial and Investment Report

CITY OF MORGAN HILL CASH AND INVESTMENT REPORT
FOR THE MONTH OF MARCH 31, 2022
FOR THE FISCAL YEAR OF 2021-22

	Invested in Fund	Yield	Book Value End of Month	% of Total	Market Value
Investments					
State Treasurer LAIF - City	All Funds Pooled	0.37%	$ 45,441,165	25.03%	$ 45,324,795
2015 Wastewater Rev Bonds - CIP	Wastewater Fund	0.37%	16,505,883	9.09%	16,463,614
Federal Issues	All Funds Pooled	0.94%	98,042,404	54.01%	94,770,480
US Treasury Notes	All Funds Pooled	1.73%	6,437,395	3.55%	4,489,470
Certificate of Deposits	All Funds Pooled	0.45%	500,000	0.28%	499,998
Dreyfus Treas Cash Management Acct	All Funds Pooled	0.16%	85,113	0.05%	85,113
	SUBTOTAL		**$ 167,011,960**	**92.00%**	**$ 161,633,469**
Bond Reserve Accounts - held by trustees					
Zions Bank - Civic Center/Library Facility					
Blackrock Liq Fund	Debt Service	0.01%	3	0.00%	3
Zions Bank - MH Police Facility Lease Revenue Bonds					
Blackrock Liq Fund	Debt Service	0.01%	4	0.00%	4
BNY - RDA Bonds					
Dreyfus Cash Mgmt 521	Successor Fund	0.01%	6,262,932	3.45%	6,262,932
Zions Bank - MH Ranch 2015					
Blackrock Liq Funds Fed Fund -DI -2015	Agency Fund	0.01%	614,302	0.34%	614,302
Zions Bank - Madrone Bus Park Taxable/ Tax Exempt 2015					
Blackrock Liquidity Temp Fund-2015	Agency Fund	0.01%	596,450	0.33%	596,450
	SUBTOTAL		**7,473,690**	**4.12%**	**7,473,690**
Other Cash/Deposits					
General Checking	All Funds		1,825,901	1.01%	1,825,901
Workers' Comp Administrators	Workers' Comp		30,000	0.02%	30,000
Petty Cash & Emergency Cash	General Fund		7,112	0.00%	7,112
CALPERS CERBT - OPEB Trust			3,487,404	1.92%	4,194,950
PARS - PENSION Trust			1,700,000	0.94%	1,987,827 **
	SUBTOTAL		**7,050,417**	**3.88%**	**8,045,789**
Total Cash and Investments			**$ 181,536,067**	**100.00%**	**$ 177,152,949**

** As of 02/28/2022

CASH ACTIVITY SUMMARY
FY 2021-22

Fund Type	07/1/21 Balance	Change in Cash Balance	3/31/2022 Balance
General Fund	$ 19,007,873	$ 1,673,604	$ 20,681,477
Community Development	1,077,499	74,934	1,152,433
RDA Successor Agency (except Housing)	508,427	5,755,321	6,263,749
Housing Successor Agency/ CDBG	4,307,419	334,589	4,642,008
Water - Operations	2,573,349	431,704	3,005,052
Water Other	15,405,786	3,097,753	18,503,539
Sewer - Operations	1,593,140	1,632,205	3,225,345
Sewer Other	57,221,072	(3,033,264)	54,187,808
Other Special Revenue	7,425,644	1,105,689	8,531,334
Streets and Capital Projects (except RDA)	37,931,830	(173,075)	37,758,756
Debt Service	337,123	(32,855)	304,268
Internal Service	19,378,242	1,128,766	20,507,008
Agency Funds (assessment dists./refundable deposits)	3,356,940	(583,651)	2,773,290
Total	**$ 170,124,346**	**$ 11,411,721**	**$ 181,536,067**

https://www.morgan-hill.ca.gov/DocumentCenter/View/40944/March-2022-Financial-and-Investment-Report-PDF

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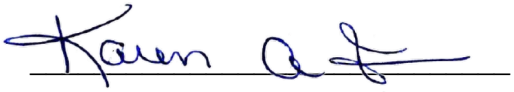
Los Gatos Municipal Code 2.30.035.

Milpitas Municipal Code VI-1-3.04.

Interviews

Interviews were conducted with 16 individuals between April 25, 2022, and June 16, 2022.

This report was **ADOPTED** by the 2022 Santa Clara County Civil Grand Jury on this 14th day of December, 2022.



Karen Enzensperger
Foreperson

PUBLIC CORRESPONDENCE

The following is public correspondence received by the City Clerk's Office after the posting of the original agenda. Individual contact information has been redacted for privacy. This may *not* be a comprehensive collection of the public correspondence, but staff makes its best effort to include all correspondence received to date.

To send correspondence to the City Council, on matters listed on the agenda please email PublicComment@losaltosca.gov

From: Bill Hough
To: City Council; Public Comment
Subject: Public comment on January 24 agenda item 1
Date: Friday, January 20, 2023 11:59:50 AM

I object to this item being on the consent calendar.

This writer notes that the city claims that this is essentially a formatting dispute. The city's response says *Respondent notes that Government Code Section 41004 does not specify the manner in which the city treasurer is to provide the treasurer's report*.

Nonetheless, it would be good form for the City Manager to provide a plain English explanation of this dispute to the Council and the residents. Additionally, this explanation should be prominently posted on the City's website and be submitted as an op-ed to the *Town Crier* and the *Palo Alto Daily Post* in the interests of transparency.

Bill Hough
Los Altos resident and taxpayer

CITY COUNCIL MEETING
MINUTES
7:00 PM - Tuesday, January 10, 2023
via Videoconference and In Person

CALL MEETING TO ORDER

At 7:05 p.m. Mayor Meadows called the meeting to order.

ESTABLISH QUORUM

PRESENT: Councilmembers Fligor, Lee Eng (via Zoom), Dailey, Vice Mayor Weinberg, Mayor Meadows

ABSENT: None

PLEDGE ALLEGIANCE TO THE FLAG

Councilmember Dailey lead the pledge of allegiance.

REPORT ON CLOSED SESSION

No closed session, nothing to report.

CHANGES TO THE ORDER OF THE AGENDA

There were no changes.

PUBLIC COMMENTS ON ITEMS NOT ON THE AGENDA

A. Public Comment on Items not on the Agenda

The following members of the public spoke: Rhoda Fry.

SPECIAL ITEM

B. Mayor's Comments

Mayor Meadows provided comments to the community.

CONSENT CALENDAR

1. **Minutes:** Approve Minutes of the City Council Regular Meeting of December 13, 2022. (A. Rodriguez)

Following a motion by Vice Mayor Weinberg, seconded by Councilmember Fligor, Item 1 was approved with the following roll call vote:

DRAFT

AYES: Councilmembers Fligor, Lee Eng, Dailey, Vice Mayor Weinberg, Mayor Meadows
NOES: None
ABSENT: None
ABSTAIN: None

PUBLIC HEARINGS

2. **Sixth Cycle Housing Element 2023-2031:** A Resolution of the City Council of the City of Los Altos, California, adopting the Mitigated Negative Declaration (MND), based on its independent analysis that MND was completed in compliance with the California Environmental Quality Act (CEQA); find that there is no substantial evidence that the project will have a significant effect on the environment; and that the MND reflects the City's independent judgment and analysis; approving the 2023-2031 Housing Element of the City's General Plan; and Authorizing the Development Services Director to submit the Housing Element to the California Department of Housing and Community Development (HCD) for its consideration and certification.

Development Services Director Zornes introduced David Bergman with LWC, who presented the item to Council.

Vice Mayor Weinberg, Mayor Meadows, Councilmember Fligor, and Councilmember Lee Eng asked clarifying questions and Director Zornes responded.

Mayor Meadows opened the public hearing and the following members of the public spoke: Freddie Wheeler, Erik Steinle, Jon Baer, Jeanine Valadez, Rhoda Fry, Rani Fischer, Rigo Gallardo, Terry Couture, Teresa Morris, Tom F, Roberta Philips, Payal Bhaduri, and Joe Beninato, Debbie Skelton, Anne Paulson.

At 8:51 pm, Mayor Meadows called for a recess and reconvened the meeting back to order at 9:03 pm.

Council engaged in discussion and asked Director Zornes additional questions.

Mayor Meadows closed public comment and continued the Public Hearing to the January 24, 2023, Regular Meeting.

At 10:50 pm, Mayor Meadows called for a recess and reconvened the meeting back to order at 10:55 pm.

DISCUSSION ITEMS

3. **Second Amendment to the Noll & Tam Architects and Planners' EOC Conceptual Design Agreement for the Design, Construction Documents, and Construction Administration for the New Emergency Operations Center (EOC)**: Adopt a resolution to authorize the City Manager to execute Amendment No. 2 to the EOC Conceptual Design Agreement between the City of Los Altos and Noll & Tam Architects and Planners through FY 24-25 in an amount not to exceed $250,690 to provide Design, Construction Documents, and Construction Administration for a new Emergency Operations Center to be constructed in the Community Center (M. Loatfi)

City Manager Engeland introduced the item to Council.

DRAFT

Councilmembers Fligor, Lee Eng, and Dailey asked clarifying questions and City Manager Engeland responded.

The following members of the public spoke: Art Whipple, Harry Guy, and Roberta Phillips.

A motion by Vice Mayor Weinberg, seconded by Mayor Meadows, to approve the Second Amendment to the Noll & Tam Architects and Planners' EOC Conceptual Design Agreement for the Design, Construction Documents, and Construction Administration for the New Emergency Operations Center passed with the following roll call vote:

AYES: Councilmembers Fligor, Lee Eng, Dailey, Vice Mayor Weinberg, Mayor Meadows
NOES: None
ABSENT: None
ABSTAIN: None

4. **Emergency Declaration Resolution**: Adopt a Resolution extending the declaration of a local emergency due to the COVID-19 pandemic and provide direction on the conduct of Commission meetings (J. Maginot)

Assistant City Manager Maginot presented the item to Council.

There was no public comment.

Council engaged in discussion and asked clarifying questions and Assistant City Manager Maginot responded.

A motion by Vice Mayor Fligor, seconded by Mayor Weinberg, to adopt a Resolution extending the declaration of a local emergency due to the COVID-19 pandemic, passed with the following roll call vote:

AYES: Councilmembers Fligor, Lee Eng, Dailey, Vice Mayor Weinberg, Mayor Meadows
NOES: None
ABSENT: None
ABSTAIN: None

Council agreed and gave direction to allow the public participation to continue for Council meetings through the hybrid format.

Council agreed to have Commissions come back to in person meetings starting in March, 2023.

5. **Affirm 2023 Council Commission and Committee Assignments:** Pursuant to City Council Norms and Procedures, Affirm Mayor appointments to Local, Regional Boards and City Committees and Commissions

Mayor Meadows introduced the item to Council.

The following members of the public spoke: Jeanine Valadez, Sashi B, Liang Chao, Roberta Philips, and Nancy.

The Council engaged in discussion.

DRAFT

Vice Mayor Weinberg called forth a violation of the Council Norms by Councilmember Lee Eng. As defined in the Council's Accountability Policy, the Council issued a warning to Councilmember Lee Eng, which serves as her first warning under the Policy. The warning is in response to the Councilmember's violation of Council Norms and Procedures 6.3 Regional Boards and 11.10 Councilmember Respect.

Mayor Meadows amended her Council assignments to the Cities Association Legislative Action Committee appointing Councilmember Fligor as the primary and herself as the secondary and made no appointment to the Santa Clara County Library JPA.

A motion by Councilmember Dailey, seconded by Councilmember Fligor, to adopt the Mayor appointments as amended passed with the following roll call vote:

AYES:	Councilmembers Fligor, Dailey, Vice Mayor Weinberg, Mayor Meadows
NOES:	None
ABSENT:	None
ABSTAIN:	Councilmember Lee Eng

Mayor Meadows requested the Interim City Clerk to communicate to VTA that Vice Mayor Weinberg received the Council's nomination to be the Valley Transportation Authority Board Alternate for the North County Cities Group with all the rights and obligations pertaining thereto.

INFORMATIONAL ITEMS ONLY

6. Tentative Council Calendar

COUNCIL/STAFF REPORTS AND DIRECTIONS ON FUTURE AGENDA ITEMS

Vice Mayor Weinberg thanked Staff for their work regarding the recent weather emergencies.

Vice Mayor Weinberg requested that the Council issue a warning to Councilmember Lee Eng pursuant to the censure and formal admonition provisions of this Council's Accountability Policy. Mayor Meadows and Councilmember Dailey supported.

Councilmember Fligor reported the start of her 2023 office hours being the 3rd Friday of the month alternating between Grant Park and Community Center with a start time of 9:30 am.

City Manager Engeland reported the Emergency Operation's Center is active at level 3 and monitoring current storms.

ADJOURNMENT

Mayor Meadows adjourned the meeting at 12:44 am.

_____

Sally Meadows, MAYOR

ATTEST:

DRAFT

_____

Angel Rodriguez, INTERIM CITY CLERK

DRAFT

AGENDA REPORT SUMMARY

Meeting Date: January 24, 2023

Subject: City Council public hearing to review and consider adoption of the Los Altos 6th Cycle Housing Element 2023-2031 and Mitigated Negative Declaration (MND).

Prepared by: Nick Zornes, Development Services Director
Approved by: Gabe Engeland, City Manager

Attachment(s):
1. 6th Cycle Housing Element 2023-2031, City of Los Altos
2. Initial Study/Mitigated Negative Declaration, City of Los Altos
3. November 10, 2022, HCD Findings Letter, City of Los Altos
4. IS-MND - Public Comments Received
5. IS-MND Mitigation Monitoring and Reporting Program-City of Los Altos
6. Planning Commission Resolution – PC 2023-01 (Signed)
7. Planning Commission - Public Comments Received
8. City Council Resolution – CC 2023-XX

Initiated by: City Council.

Fiscal Impact

Associated fiscal impacts are anticipated for State mandated programs included within the 6th Cycle Housing Element 2023-2031. Some of the programs included within the Housing Element will require work to be completed by a third-party consultant, other programs will require the allocation of funds for additional full-time City staff such as a Housing Manager within the Development Services Department. The majority of programs will be funded by the General Fund as indicated within the Draft Housing Element. In future years the City may be eligible for grant opportunities which are generally reimbursement structured grants, which could help to offset the overall cost of housing programs included, however in no circumstance may a program be dependent upon the award of grant funding.

Environmental Review

The "project" requires environmental review consistent with the California Environmental Quality Act (CEQA). The Housing Element is a policy-level document that does not create physical residential growth in and of itself, but only identifies adequate and available sites for residential

Prepared By:

City Manager: GE

City Attorney: JH

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development, and programs to be undertaken that facilitate the creation of housing during the 2023-2031 planning period.

Based on its independent analysis a Mitigated Negative Declaration (MND) was completed in compliance with the California Environmental Quality Act (CEQA); and finds that there is no substantial evidence that the project will have a significant effect of the environment; and that the MND reflects the City's independent judgement and analysis; and approves the 2023-2031 Housing Element of the City's General Plan; and Authorizing the Development Services Director to submit the Housing Element to the California Department of Housing and Community Development (HCD) for its consideration and certification.

A Notice of Intent (NOI) to adopt the Initial Study/Mitigated Negative Declaration was released on November 30, 2022, for a 30-day public review that concluded on December 30, 2022.

Staff Recommendation

1. Adopt City Council Resolution No. CC-2023-XX adopting the 6th Cycle Housing Element 2023-2031 and Mitigated Negative Declaration (MND) in compliance with State law.
2. Direct the Development Services Director to submit the Adopted 6th Cycle Housing Element to the State of California, Housing and Community Development Department (HCD) for final concurrence.

Summary and Key Considerations

This continued item was previously considered at the January 10th, 2023, City Council Public Hearing. During the public hearing the City Council received a presentation, asked questions of staff, received public testimony, conducted discussion, and asked additional questions of staff. The City Council directed the Development Services Director to revise the draft housing element based upon public testimony and City Council discussion and return to the City Council on January 24, 2023. Staff has incorporated the necessary revisions discussed at the January 10, 2023, meeting. A supplemental memo will be added to this agenda item which outlines the revisions made to the draft housing element being considered tonight.

This is a public hearing to obtain the Planning Commission recommendation to the City Council regarding the 6th Cycle Housing Element 2023-2031. The Housing Element is required by State law to identify and analyze existing and projected housing needs to preserve, improve, and develop housing for all economic segments of the community, and demonstrate how the City of Los Altos

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will accommodate its fair share of regional housing needs. The City of Los Altos is updating the Housing Element consistent with the requirement of State law and guidance provided by the State of California, Housing and Community Development Department (HCD). The Planning Commission will be making a recommendation on the item to the City Council. The City Council will consider the item at a separately noticed public hearing on January 10, 2023, and January 24, 2023.

Background

Every eight years the State requires that each jurisdiction update its Housing Element to address future housing needs. The Department of Housing and Community Development (HCD) is the agency responsible for tracking and determining compliance with the State Housing Law. The City must adopt the 6th Cycle Housing Element Update (2023-2031) by January 31, 2023.

There are consequences for the city if the Housing Element is adopted after January 31, 2023, or if the Housing Element is not found to be in substantial conformance with State law within 120-days after the statutory due date of January 31, 2023. If a Housing Element is not in substantial conformance with State law, the City will be vulnerable to litigation by the State Attorney General and other interested parties, be potentially ineligible for some state and regional funding, and other penalties as allowed by State law or as determined by a court.

Objectives of the Housing Element:

- An analysis of housing needs in Los Altos
- Policies that address the needs of the community
- Programs that will implement those policies
- Programs that are required to comply with State law

The Housing Element is part of the City's General Plan, which sets forth guiding policies for future development. The requirement for each city to adopt a General Plan is contained in State law which also lays out specific requirements for each element. The Housing Element provides an overarching statement of City policies and programs to maintain and improve existing housing and accommodate the City's fair share of population growth needs. The requirements in State law for Housing Elements include the following:

- Ensure adequate sites for new housing for persons of all income levels
- Encourage and facilitate the development of affordable housing
- Conserve and improve the existing affordable housing stock

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- Analyze and remove government constraints on new housing development
- Promote equal housing opportunities
- Preserve assisted housing

What Are Housing Element Programs?

The City of Los Altos must identify specific programs in its housing element that will allow it to implement the stated policies and achieve the stated goals and objectives. Programs must include specific action steps the City will take to implement its policies and achieve its goals and objectives. Programs must also include a specific timeframe for implementation, identify the agencies or officials responsible for implementation, describe the city's specific role in implementation, and (whenever possible) identify specific, measurable outcomes.

The programs included within the Los Altos Sixth Cycle Housing Element 2023-2031 create the overarching framework and roadmap that will guide the city in meeting its housing needs within the community. Each program included will require additional work, public input, and development in the future. This means that programs listed within the Housing Element will be heard at future public hearings and workshops to develop the specific amendments to the City's Zoning Code, and other Land Use documents. This process also allows for specific refinement of each program when developing the implementing ordinances for the City.

Regional Housing Needs Allocation (RHNA):

The City of Los Altos is within the Association of Bay Area Governments (ABAG) comprised of 109 jurisdictions, with a Housing Element Planning Period of 2023-2031. Before the Housing Element can be updated, ABAG produces the Regional Housing Needs Allocation (RHNA) in partnership with the California Department of Housing and Community Development (HCD). HCD starts the housing element revision process by determining how many additional housing units each region in California will need over the next housing element revision period. HCD considers the projected population increase to determine the anticipated household growth rate, household sizes, household formation, vacancy rates and jobs-housing balance to determine an allocation of housing need for each region. HCD determined that the Bay Area region must plan for 441,176 new housing units from 2023 to 2031, approximately 2.35 times more units than were included in the previous housing element cycle.

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Next, ABAG assigns each jurisdiction within the region with its "fair share" of the RHNA for the housing element planning period, based on an allocation methodology developed as part of the process and approved by HCD. The assigned need is broken down by four income categories: very low, low, moderate, and above moderate. Draft allocations are issued, followed by an appeals period. After the appeal hearings, ABAG will issue final allocations by the end of 2021. ABAG's final distribution of housing needs numbers must account for the region's total RHNA.

City of Los Altos final allocation is 1,958 units which are distributed between the following four (4) income categories:

- Very Low Income (Less than 50% of Area Median Income): 501 units
- Low Income (50-80% of Area Median Income): 288 units
- Moderate Income (80-120% of Area Median Income): 326 units
- Above Moderate Income (More than 120% of Area Median Income): 843 units

The City's RHNA represents a planning target and is not a building quota. The Housing Element Update must show how Los Altos will accommodate the RHNA on sites that are realistic for housing development within the eight-year housing element period (2023-2031) consistent with State law and guidance.

Sites Inventory

The sites inventory (also called the available land inventory or sites map) is a crucial part of the Housing Element. In the sites inventory, a jurisdiction identifies where it has capacity to meet the housing production quotas assigned by the State through ABAG for all income categories (i.e., RHNA). It is typically in the form of a map and table listing features and characteristics of the properties. State law and guidance include certain requirements for sites to be sufficient for inclusion in the sites inventory (e.g., size of parcels identified for lower income, allowed density for lower income sites, etc.). Specifically, State law requires that the site inventory include:

- Adequacy of infrastructure to support the site
- Adequacy of the site size to accommodate housing for lower-income households as such projects typically require 50-150 units (a minimum site size of 0.5-acre is required for lower-income sites)

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- The RHNA income category the site is expected to serve (if the site is later developed for a different income category the City must then identify a new site or sites for a similar amount of the targeted development type)
- A discussion of whether the site was included in previous inventories and, if so, why it has not yet been developed
- A description of how the sites affirmatively further fair housing (defined as taking meaningful actions that, collectively, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.)
- For sites that are not vacant, an explanation of why it is reasonable to expect that the site will be redeveloped with housing before 2031 (e.g., underutilized property, condition/age of structure, not precluded by existing leases, development trends, market conditions, etc.)

Site Inventory Buffer. SB 166 enacted by the California Legislature and signed by the Governor in 2017 created a requirement for "no net loss" of housing capacity during the entire planning period covered by the Housing Element Update. This means that Los Altos must maintain adequate sites to accommodate its remaining unmet RHNA for each income category at all times throughout the entire eight-year planning period covered by the Housing Element Update (through 2031). This requirement is the source of the "buffer" as State law anticipates that not all the sites that are identified will develop at the planned income level. To meet the requirement to maintain adequate sites at all income levels, HCD is recommending that communities include excess housing unit capacity in their plans. While the excess capacity over RHNA is not required, HCD recommends that communities plan for a buffer of between 15 and 30% of their RHNA capacity to assist with compliance with the "no net loss" requirement. Communities can address this need for a buffer based on their specific circumstances. In Los Altos' case, the buffer will be established as part of the site inventory identification process.

On-time Housing Element Importance

The City must adopt the Sixth Cycle Housing Element 2023-2031 by January 31, 2023. The City must be found to be in substantial compliance (meaning a letter from HCD affirming compliance with Housing Element Law) within 120-days of the statutory deadline of January 31, 2023. If the City is not found in substantial compliance within 120-days of the statutory deadline, all rezoning required within the housing element shall be completed within one year of the housing element

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due date (as opposed to three years) to maintain housing element compliance. Additionally, an approved Housing Element makes Los Altos eligible for a variety of State grants, including funds for affordable housing, parks, and infrastructure. If the City does not meet its deadline to adopt its updated Housing Element, it could face fines and lawsuits from the State. A court may limit local land use decision-making authority until the City brings its Housing Element into compliance.

Housing Element Development

In June 2021, the City selected Lisa Wise Consulting (LWC) as the consulting firm to prepare the City's 2023-2031 Housing Element after conducting a competitive RFP and bidding process. LWC began working with staff to collect housing data in late summer and fall. In October 2021, the City Council Housing Element Committee was formed, and the subcommittee provided direction to staff on a community engagement approach. On March 22nd, 2022, the role of the Committee was expanded to provide general feedback in the Housing Element update process. Staff has worked closely with the team at LWC and their outreach subconsultant, Plan to Place, to ensure that Los Altos residents, the local business community and its workforce, community and faith-based nonprofits, and other communities of interest, are engaged and informed about the Housing Element update.

Outreach (Prior to HCD First Submittal)

Phase One, Staff began the outreach process with a multi-faceted approach last November through 1) the establishment of a Housing Element page on the City's website, which is maintained by LWC and city staff, and is linked to the City's main webpage, through which the city has received input directly from residents and businesses; 2) six Housing Element pop-up tables at various events around the city; 3) ongoing small group virtual meetings on the Housing Element, ranging from 2 to 10 attendees, of which 30 have been held to date, where staff presents information and answers questions; 4) two double page ads in the Town Crier; 5) ongoing Housing Element newsletters and alerts for over 150 persons who have signed up on the interest list; 6) two Community Workshops, with the first attended by over fifty households, and the second on March 1st, attended by over 150 households; 7) an informational flier sent to every household in Los Altos; and multiple banners (8' by 3') posted on varies City Buildings and street corners advertising the Housing Element Update website and opportunity for continued public input.

Phase Two, provided information and allowed feedback on the potential housing element sites and potential rezoning sites in the City. Staff sent a postcard to all Los Altos residents, informing them of the community workshop on March 1st, requesting feedback on the potential sites and rezoning opportunities, and directing them to the Housing Element website for complete information. A

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map of potential sites and rezoning opportunities was posted on the Housing Element website prior to the March 1st, community workshop.

Since that time, staff has met with the business community, residents, and many local organizations, including the Chamber of Commerce, Los Altos Village Association, Los Altos Property Owners Downtown, the Los Altos Advocates for Affordable Housing, the League of Women Voters, Los Altos Residents, Friends of Los Altos, nonprofit housing developers, community-based and faith-based nonprofits, veterans' groups, and businesses and their workforce. Staff has received and shared with the consultant many e-mails related to the sites analysis from all groups, developers, residents, and interested parties.

Critical Milestones

On April 26, 2022, at a Joint Session Planning Commission and City Council meeting, LWC presented five (5) policy options for the Council and Commission consideration and feedback. Discussion was held related to allowing residential uses in PCF and OA zoning districts, and whether to increase density and height in CR, CRS, and the Loyola Corners Specific Plan. After the April 26, 2022, Joint Session Planning Commission and City Council meeting, LWC and staff have reconciled comments received and incorporated as necessary required modifications to the Draft Sixth Cycle Housing Element.

On June 22, 2022, the City of Los Altos made available the Public Review Draft of the Sixth Cycle Housing Element 2023-2031, opening the required minimum 30-day public participation requirement. The Public Review Draft was posted on the dedicated housing element webpage at: www.losaltoshousing.org and shared in a Citywide Press Release in addition to an email/newsletter sent to all interested parties on the housing element update distribution list.

On July 7, 2022, the Public Review Draft was presented to the Planning Commission. The Planning Commission received an overview of the completed Public Review Draft, accepted Public testimony, discussed the item and recommended that the City Council submit the Public Review Draft of the Sixth Cycle Housing Element 2023-2031 to HCD following the required Public Participation period.

On July 12, 2022, City Council meeting, City Council accepted Public Testimony regarding the of the Public Review Draft of the Sixth Cycle Housing Element 2023-2031, discussed the draft, and direct staff to consider and incorporate appropriate public comments into the Draft Housing Element during the required 10 business days, and then transmit the document for HCD's formal first review.

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The City formally submitted the first Draft of the Sixth Cycle Housing Element on August 12, 2022, to HCD. During HCD's 90-day review, the City received initial verbal comments from HCD (2-weeks) prior to receiving HCD's formal Findings Letter. On November 10, 2022, the City of Los Altos received its formal comment letter from HCD regarding the Draft Sixth Cycle Housing Element (Attachment #2). A comprehensive analysis and how the revised Housing Element addressed comments received is covered later in the report.

On November 29, 2022, City Council Study Session, City Council accepted Public Testimony regarding the status of the Sixth Cycle Housing Element 2023-2031, and report on initial findings letter from the Department of Housing and Community Development (HCD) post 90-day review, and proposed timeline and response to required amendments to the draft Housing Element to comply with State law. The timeline presented on November 29, 2022, reflected the critical milestones that the City must adhere to in order to adopt and be found to be in substantial compliance by HCD.

On November 30, 2022, the City of Los Altos released a Notice of Intent (NOI) to adopt the Initial Study/Mitigated Negative Declaration, for a 30-day public review that concluded on December 30, 2022. At the time of publishing of this report (December 29, 2022) only **one** public comment had been received regarding the Initial Study/Mitigated Negative Declaration for the Sixth Cycle Housing Element.

Outreach (Since receipt of HCD Findings Letter)

On Friday, November 18, 2022, Director Zornes met with five members of the Los Altos Affordable Housing Alliance virtually for a 1-hour meeting which was extended to 2-hours to discuss HCD's Findings Letter, and potential solutions for the City to consider to be found in substantial compliance. Director Zornes took note of all comments provided by the Los Altos Affordable Housing Alliance and has incorporated all appropriate comments/solutions within the draft Housing Element that are consistent with the requirements of State law. A follow-up letter was received by Director Zornes which outlined the specific concerns and proposed revisions from the Los Altos Affordable Housing Alliance; these comments were addressed within the document or incorporated accordingly.

On November 30, 2022, Director Zornes met with Joanne Price who represents Dignity Moves and Life Moves, two non-profit organizations in Silicon Valley that work with those in the community facing homelessness. The two organizations have had significant success with the

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creation of housing for those facing homeless of projects for temporary and permanent supportive housing. The contact for Dignity Moves was provided by Councilmember Lee Eng the week prior. Much can be learned from the staff at Dignity Moves and Life Moves as we work to address homelessness in the development and implementation of many of our programs in the 6th Cycle Housing Element.

On December 7, 2022, Director Zornes presented to the Los Altos Chamber of Commerce regarding the status of the City's Sixth Cycle Housing Element. Director Zornes received overwhelming support from all in attendance at the Chamber of Commerce meeting where it was also expressed the hopefulness of the subsequent programs that will be developed and implemented within Los Altos.

On December 16, 2022, Director Zornes presented to the Los Altos Community Coalition regarding HCD's Findings Letter, and what is next for the Sixth Cycle Housing Element. Director Zornes received overwhelming support from all in attendance at Los Altos Community Coalition meeting where it was also expressed the hopefulness of the subsequent programs that will be developed and implemented within Los Altos.

On December 16, 2022, City Manager Engeland and Director Zornes met with the Los Altos Resident (LAR) group regarding HCD's Findings Letter, and what is next for the Sixth Cycle Housing Element. Director Zornes received a letter of appreciation for the work completed up until that point on the Housing Element and support for the Draft 6th Cycle Housing Element with the discussed revisions that have been included in the updated draft.

On December 16, 2022, Director Zornes met with the League of Women Voters to discuss an earlier received comment letter regarding the formal Findings Letter from HCD. Additionally, the League provided Director Zornes with a list of questions that helped to organize the conversation; the initial discussion was planned to last 1-hour, which extended to a 2-hour discussion to further understand the forthcoming revisions to the draft Housing Element. The meeting was productive and helped to provide insight on the needs and concerns of the League which has resulted in further improvements to the Los Altos Housing Element.

Revisions Post 90-day Review

The HCD Findings Letter dated November 10, 2022, provided comments that were organized under the following topics: Housing Needs, Resources, and Constraints, Housing Programs and Public Participation. A summary of HCD's comments and discussion are provided below.

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Housing Needs, Resources, and Constraints

1. *Affirmatively furthering fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2…shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583(c)(10)(A).)*
    - AFFH was first required with the adoption of AB 686 which was signed in 2018. Importantly AB 686 also created new housing element requirements applying to all housing elements due to be revised on or after January 1, 2021. This is the first housing element for the City of Los Altos where the specific requirement for Affirmatively Furthering fair Housing must be included within our analysis. The goal of Affirmatively Furthering Fair Housing (AFFH) is to combat housing discrimination, eliminate racial bias, undo historic patterns of segregation, and lift barriers that restrict access in order to foster inclusive communities and achieve racial equity, fair housing choice, and opportunity for all Californians.
        - The Los Altos Housing Element Team has provided further clarification and explanation within Appendix F, Affirmatively Furthering Fair Housing (AFFH) based on the data available. It will be important for the City of Los Altos to further collect and analyze data in the coming years in order to ensure that the City is effectively Affirmatively Furthering Fair Housing within the jurisdiction.
        - Revisions to the Draft Housing Element have been incorporated throughout Appendix to address the comments provided by HCD.
2. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583(a)(2).)*
    - Specific Data requested by HCD in the Findings Letter has been incorporated into Appendix A, Housing Needs Assessment.
    - Policies and programs that are included within the Draft Housing Element which are designed to provide more affordable housing options and help to reduce the level of overpayment experience in Los Altos are:
        - Program 2.A – Continue to implement and enhance inclusionary housing requirements.
        - Program 2.C – Assist in securing funding for affordable housing projects.
        - Program 2.D – Encourage and streamline Accessory Dwelling Units (ADUs).
        - Program 5.E – Help secure funding for housing rehabilitation and assistance programs.
        - Program 6.D – Promote Housing Choice (Section 8) rental assistance program.

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3. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583(a)(3).)*
    - In general, HCD's Findings Letter articulates fundamentals for the site inventory analysis which is required of all housing elements. Progress towards meeting RHNA will require the City to provide additional analysis of "Pipeline" projects and the probability of those projects being constructed in the Planning Period (2023-2031). City staff if confident that the all-pipeline projects will be constructed within the Planning Period as the majority of those projects/units have submitted their construction documents to the city for Plan Check.
        - Of the 587 Total Net New Units:
            - 401 units have been entitled/approved in 2022; 135 of which are designated to very-low-, low- and moderate-income households.
            - 415 units are in Building Plan Check; 141 of which are designated to very-low-, low- and moderate-income households.
            - 63 units are currently under construction; 9 of which are designated to very-low-, low- and moderate-income households.
        - It is important to note that of the 587 "pipeline" projects or as detailed in Table B-3: Entitled and Proposed Developments in Appendix B, Sites Inventory & Methodology only 2 units are on a "vacant" site, all remaining units listed with Table B-3 are developed sites that are ripe for redevelopment. Additionally, Program 1.N – Facilitate and monitor pipeline housing projects, will be monitored closely by City staff to ensure that these projects are being reviewed accordingly.
    - The draft housing element relies heavily on nonvacant sites; over 50% of sites identified. This is common in most jurisdictions that are close to buildout much like the City of Los Altos. The draft housing element must further demonstrate that the existing uses is not an impediment to additional residential development.
        - Site visits have been conducted to verify occupancy of several of the sites that are listed in Table B-3, where it has been confirmed that there are several vacancies present.
    - Accessory Dwelling Unit ordinance shall comply with State law at all times. The City understands this requirement and has further added language to Program 2.D. The program clearly demonstrates compliance with the requirement as requested within the HCD Findings Letter.
        - Additional information was provided to City staff during a preliminary call with HCD. The City's ADU Ordinance has been determined to be inconsistent with State law, and revisions will be necessary. HCD verbally

and in writing has stated that the City will receive a letter regarding noncompliance issues under a separate cover which will require zoning code amendments. Director Zornes will promptly review the letter of noncompliance and with consultation of the City Attorney will draft amendments to the zoning code based on HCD's noncompliance letter.

- The draft housing element must further demonstrate that Emergency Shelters are allowed within the City, and clearly show what zones they are allowed by-right.
    - Program 3.H has been amended to reflect that no discretionary action is required.
    - Program 3.M has been added to reflect that the City of Los Altos will ensure compliance with parking requirements for Emergency Shelters consistent with State law.
- The draft housing element must clearly demonstrate that Manufactured Housing is allowed within the City and does not require any additional review in order to be located within the City.
    - Program 3.J – Explicitly allow manufactured homes consistent with State law, has been amended to further include language that all Manufactured Homes are permitted in the same zones where single-family homes are allowed.

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583(a)(5).)*
    - The Loyola Corner Specific Plan has a requirement for Minimum Unit Sizes, this requirement as well as other land use controls has not been enforceable since the adoption of the Housing Crisis Act.
        - Program 1.E – has been amended to clarify the City's commitment to allowing housing within the Loyola Corners Specific Plan. The City will update or rescind in entirety and revert to underlying zoning to facilitate housing production. The City will eliminate the 20-unit density cap, the dwelling unit size requirement, and the story count and height limitation.
    - Citywide Parking Requirements and Downtown Parking Plan.
        - Program 3.A – Prepare a Downtown parking plan and update citywide parking requirements. The City has committed to expanding the program to be a comprehensive analysis of parking requirements in the City. An easy to navigate Parking Matrix will be the result of this program in addition to a Parking Management Plan for the Downtown Los Altos Area.

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- Fees and Exactions. The City will include a program that analyzes the Development Fee Schedule within Los Altos.
    - Program 3.D – Evaluate and adjust impact fees, has been amended to commit the City of Los Altos to conduct a Comprehensive Fee Study. At the completion of the fee study the City Council will adopt an updated fee schedule which reflects the appropriate cost of permitting and project review for development within the City.
- Local Processing and Permit Procedures.
    - Program 3.H – Amend design review process and requirements, the program has been revised to specify the barriers that have been identified in Appendix C, Housing Constraints, and committed the City to the following:
        - Consolidation of the Design Review Commission and Planning Commission into one body upon adoption of the Housing Element.
        - Formally rescind the requirement of 3rd Party Independent Architect Review for all project types (this requirement was never formally adopted and was implemented by staff per council discussion, this requirement is not enforceable.)
        - Discretionary approvals for housing developments of five or fewer units will be approved by the Development Services Director.
        - Limit design review hearings to a maximum of three, regardless of the hearing body.
        - Develop standard conditions of approval that are based on codified requirements within the Los Altos Municipal Code. This is to provide applicants a level of certainty as well as ensure that regulations are being applied consistently on all projects and not negotiated during a Public Hearing.
        - Create a discretionary review matrix that clearly identifies the reviewing body for approvals and appeals. Redesignate the City Council to only serve as the decision-making authority for appeal of design review and other land use decisions, consistent with the majority of all jurisdictions in the County of Santa Clara.
        - Clarify that decisions on appeals of housing development must be based on objective standards consistent with State law. Furthermore, appeals shall be filed with the City of Los Altos within 10 calendar days.

<u>Housing Programs</u>

- *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are*

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ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element... (Gov. Code, § 65583(c).)

- The programs below have been amended to include the following specifics which are consistent with the comments received by HCD in the November 10, 20222 Findings Letter:
  - Program 1.B: CT Zone will increase the allowed height by a minimum of 10 feet, and one story. The program will be completed 1-year sooner than originally proposed.
  - Program 1.C: OA Zone will allow residential uses 1-year sooner than originally proposed.
  - Program 1.D: housing on church owned sites will be completed 1-year sooner than originally proposed.
  - Program 1.E: the Loyola Corners Specific Plan will be updated or rescinded and revert to underlying zoning in order to remove all barriers to the creation of housing within the area. The program will be completed 1-year sooner than originally proposed.
  - Program 1.H: The City will offer a minimum of a 20 years of a zero cost land lease to a housing development providing a minimum of 20 percent of all dwelling units to low income households. The City will encourage the development of senior, housing for persons with disabilities and veteran housing on City-owned Parking Plazas 7 and 8. The City will provide permit fee and development impact fee waivers depending on the level of affordability provided onsite. The program will be completed 1-year sooner than originally proposed and will process all approvals timely within one year.
  - Program 1.I: will provide a reduction in permit fees for the consolidation of lots and will remove any constraints to lot consolidation with adoption of municipal code amendments.
  - Program 2.A: the City will update its in-lieu housing ordinance and establish an in-lieu housing fee to help facilitate the development of both market-rate and affordable housing.
  - Program 2.C: the City has committed to further helping to obtain funding for the creation of additional affordable housing units whenever available.
  - Program 3.A: the City will complete a comprehensive parking evaluation that does not only look at parking in downtown, but citywide. The program will be completed 1-year sooner than originally proposed.
  - Program 3.B: building heights in mixed-use zones will be increased by 10-feet and one story minimum, this is consistent with the recommendations in the Downtown Vision Plan. The program will be completed 2-years sooner than originally proposed.
  - Program 4.C: Low Barrier Navigation Centers, is a program that was not completed within the last Planning Period which requires the City to complete the necessary

zoning code amendments no later than December 2023; City staff will bring draft ordinances to the Planning Commission no later than May 2023 followed by City Council immediately thereafter.

- Program 4.D: Transitional and Supportive Housing, is a program that was not completed within the last Planning Period which requires the City to complete the necessary zoning code amendments no later than December 2023; City staff will bring draft ordinances to the Planning Commission no later than May 2023 followed by City Council immediately thereafter.
- Program 4.E: Employee/Farmworker Housing, is a program that was not completed within the last Planning Period which requires the City to complete the necessary zoning code amendments no later than December 2023; City staff will bring draft ordinances to the Planning Commission no later than May 2023 followed by City Council immediately thereafter.
- Program 4.F: Reasonable Accommodations, is a program that was not completed within the last Planning Period which requires the City to complete the necessary zoning code amendments no later than December 2023; City staff will bring draft ordinances to the Planning Commission no later than May 2023 followed by City Council immediately thereafter.

- *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (*Gov. Code, § *65583(c)(1).)*
  - Program 1.G: previous sites utilized in 5th cycle housing element must be up zoned for a minimum of 30 dwelling units per acre. This is a clarifying assertion within the draft housing element which articulates in the footnotes section of the program that the CT zones allows for 38 units per acre, thus meeting the minimum of 30 units per acre.
  - (New) Program 1.M: the City must include a New Program which commits the City implementing SB 9 regulations consistent with State law. Similarly to the comments received by HCD regarding ADU's the City of Los Altos must amend its ordinance at any time there is conflict with State law.

Subject: City Council public hearing to review and consider adoption of the Los Altos 6th Cycle Housing Element 2023-2031 and Mitigated Negative Declaration (MND).

- *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583(c)(3).)*
    - The draft housing element has been revised to discuss potential governmental and nongovernmental constraints further. After further analysis constraints within the R3 Zone has been identified and modifications are necessary; Program 3.N, Modify Standards in the R3 zoning districts has been included to capture this requirement.

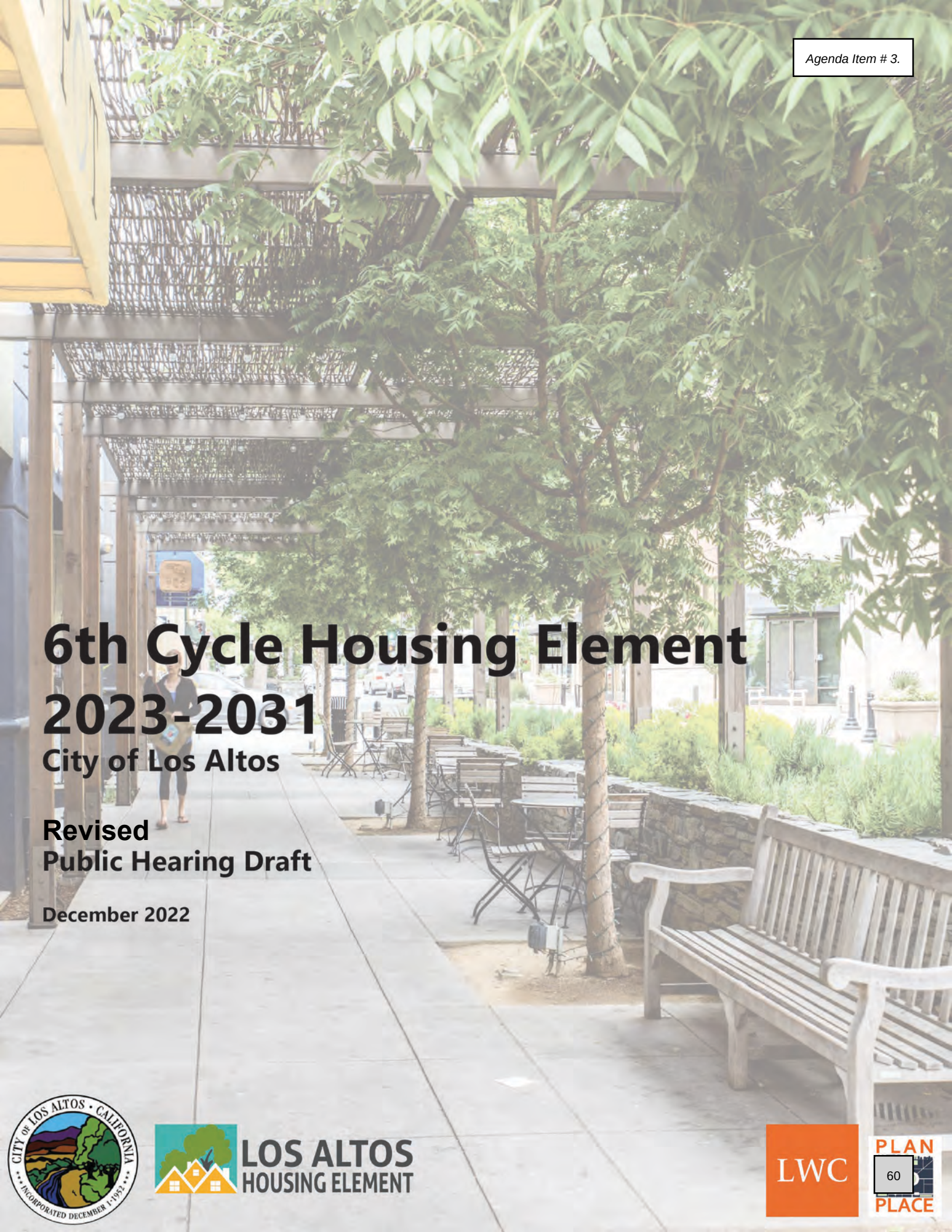
- *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583(c)(5).)*
    - HCD's Findings Letter overarchingly requires the City to clarify the commitments of AFFH. Programs 2.D, 4.J, 6.C, 6.D, and 6.E, has committed the City to providing targeted outreach, ensuring safe and adequate infrastructure to all segments of the community, provide information on the City's website, track and modify how Section 8 Vouchers are being used, and shorten the timeframe for when each program will be completed by.
        - Programs 2.D, 4.J, 6.C, 6.D, and 6.E has each been amended to achieve the requirements of AFFH in a combined effort.

Planning Commission Recommendation

The Los Altos Planning Commission held a public hearing on January 5, 2023, to review and consider the 6th Cycle Housing Element. At the meeting the Planning Commission received a PowerPoint Presentation, asked questions of staff, received public testimony, deliberated, and by majority vote approved Planning Commission Resolution PC-2023-XX (Attachment 5).

Next Steps

Should the City Council adopt the Draft 6th Cycle Housing Element 2023-2031 tonight, the Development Services Director will then submit the final document to HCD for final concurrence. The City must adopt the Sixth Cycle Housing Element 2023-2031 by January 31, 2023.



6th Cycle Housing Element 2023-2031

City of Los Altos

Revised
Public Hearing Draft

December 2022

LOS ALTOS HOUSING ELEMENT

LWC

PLAN PLACE

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Section I Introduction

I.A Community Context

Los Altos was incorporated in 1952; most of the City's growth occurred between 1950 and 1980. Los Altos was originally an agricultural town with many summer cottages and apricot orchards, and now is a residential community with tree-lined streets and a small-village atmosphere in the heart of world-famous Silicon Valley. Just 40 miles south of San Francisco, Los Altos is served by seven small retail districts, primarily in the Downtown area and on Foothill Expressway and El Camino Real. The seven square mile community is developed with various businesses, schools, libraries, and churches.

I.B Housing Element Purpose

The State of California has stated that the availability of decent and suitable housing for every California family is "a priority of the highest order" (California Government Code §54220). This objective has become increasingly urgent in recent years as communities across the State, including Los Altos, struggle to meet the housing needs of all their residents. State Housing Element Law, established in 1969, recognizes the vital role local governments play in the supply and affordability of housing and requires all cities and counties in California establish a long-range plan to meet their fair share of regional housing needs. Cities are charged with planning for the welfare of their citizens, including ensuring that the existing and projected demands for housing are adequately met.

> *High housing costs — and related housing instability issues — **increase health care costs** (for individuals and the State), **decrease educational outcomes** (affecting individuals, as well as the State's productivity), **and make it difficult for California businesses to attract and retain employees**.*
>
> *– State of California 2025 Statewide Housing Assessment*

The housing element is the primary tool used by the State to ensure local governments are appropriately planning for and accommodating enough housing across all income levels. This Housing Element covers the planning period 2023-2031. The housing element is a mandatory part of a jurisdiction's General Plan, but differs from other General Plan elements in two key aspects. The housing element must be updated every eight years for jurisdictions within a metropolitan planning organization (MPO) on a four-year regional transportation plan (RTP) cycle, such as the Association of Bay Area Governments (ABAG). The housing element must also be reviewed and approved (i.e., certified) by the California Department of Housing and Community

Development (HCD) to ensure compliance with statutory requirements. Certification also ensures that the City remains eligible for various State and federal funding sources.

In practical terms, the Housing Element provides the City with an opportunity to assess its housing needs and to develop policies and actions that effectively respond to those needs. Amongst other groups, the Housing Element affects teachers in our schools, employees in our local businesses, older residents on fixed incomes, parents and their adult children who want to remain in or return to Los Altos, and young persons wishing to live in the community. Ultimately, the supply and cost of housing affect the entire Bay Area economy and people's quality of life in the region.

At the time of publication, the COVID-19 crisis has impacted the Bay Area in significant ways. The pandemic has made the issue of housing security even more acute as residents face job loss, housing cost pressures, and disparate health impacts from the pandemic. This Housing Element has had to respond to these conditions by transitioning the public outreach process to reflect the limitations brought on by COVID-19. These actions are detailed in this report.

I.C Organization of the Housing Element

Per California Government Code §65580-65589, a housing element must consist of the following components:

- **Existing Programs Review:** An evaluation of the results of the goals, policies, and programs adopted in the previous Housing Element that compares projected outcomes with actual achieved results.

- **Housing Needs Assessment:** An analysis of the existing and projected housing needs of the community. It provides a profile of socio-demographic information, such as population characteristics, household information, housing stock, tenure, and housing affordability. The assessment also considers local special housing needs, such as, seniors, farmworkers, homeless, large households, and female-headed households.

- **Sites inventory and Methodology:** An inventory listing adequate sites that are suitably zoned and available within the planning period to meet the City's fair share of regional housing needs across all income levels.

- **Housing Resources:** An identification of resources to support the development, preservation, and rehabilitation of housing.

- **Housing Constraints:** An assessment of impediments to housing production across all income levels covering both governmental (e.g., zoning, fees, etc.) and nongovernmental (e.g., market, environmental, etc.).

- **Affirmatively Furthering Fair Housing Assessment:** AB 686 requires cities and counties to take deliberate actions to foster inclusive communities, advance fair and equal housing choice, and address racial and economic disparities through local policies and programs. The goal of AB 686 is to achieve better economic and health outcomes for all Californians through equitable housing policies. The assessment of affirmatively furthering fair housing documents compliance with AB 686.

- **Goals, Policies, and Programs:** This Section provides a statement of the community's goals, quantified objectives, and policies to maintain, preserve, improve, and develop housing, as well as a schedule of implementable actions to be taken during the planning period to achieve the goals, objectives, and policies. Quantified objectives for new construction, rehabilitation, and conserved units by income category (i.e., very low, low, moderate, and above moderate) are included to make sure that both the existing and the projected housing needs are met, consistent with the City's share of the Regional Housing Needs Allocation (RHNA).

Section II provides a summary of the projected housing need. Section III summarizes the adequacy of housing sites and housing resources with reference to relevant appendices. Section IV contains goals, policies, and actions related to housing in Los Altos. The comprehensive research and analysis supporting the development of Section IV, are compiled in appendices to this Housing Element. These appendices contain the full set of information used to inform the City's goals, policies, and programs:

- Appendix A: Housing Needs Assessment
- Appendix B: Sites Inventory and Methodology
- Appendix C: Housing Constraints
- Appendix D: Existing Programs Review
- Appendix E: Public Participation Summaries
- Appendix F: Affirmatively Furthering Fair Housing Assessment

- Appendix G: Housing Resources

I.D Data Sources and Methods

This Housing Element was updated in accordance with California Department of Housing and Community Development (HCD) guidelines for the 6th Housing Element Cycle, incorporating additional considerations required under new State housing-related legislation. Specific documents are referenced throughout the Housing Element, including but not limited to the Los Altos General Plan 2002-2020 and Los Altos Municipal Code. The analyses and findings in this document relied on data compiled from various sources, including:

- US Census Bureau (American Community Survey, Longitudinal Employer-Household Dynamics)
- California Department of Housing and Community Development (HCD)
- California Department of Finance (DOF)
- US Department of Housing and Urban Development (HUD)
- Consumer Financial Protection Bureau (CFPB)
- Association of Bay Area Governments (ABAG) pre-certified data

This document was also informed by information provided by residents, business groups, local institutions, City staff, and elected officials.

I.E Summary of Public Participation

Public participation is crucial in shaping Los Altos' housing strategy. Understanding the needs of the community enables the development of housing strategies that are most appropriate and effective. Public outreach also allows the City to identify concerns unique to certain interest groups and service providers that may not have been initially apparent. As part of the development of this Housing Element, the City's public participation program included a wide range of focus group meetings, community workshops, and meetings with the Planning Commission and City Council, as well as a variety of online resources and comment forms, and printed advertisements within the Town Crier Newspaper. Outreach activities are summarized below. For detailed public outreach summaries, please see Appendix E.

Website

The Housing Element Update website (https://www.LosAltosHousing.org) was used to provide information on the Housing Element update process and timeline, resources (e.g., reference material, draft documents, etc.), meeting notices and materials, and City contact information. Any person could sign up to receive email notifications about upcoming meetings and availability of information. The website was translatable into over 10 languages (e.g., Chinese (simplified),

Spanish, etc.), and key resource materials were translated into both Spanish and simplified Chinese. Additionally, the website offered multiple opportunities for online input through community feedback forms available throughout the process.

Public Outreach and Events

Pop-Up Events

The pop-up events provided information regarding the Housing Element update process, including frequently asked questions and informational handouts, at various locations throughout the City as follows:

- Tree Lighting/First Friday in Downtown Los Altos: December 3, 2021
- Grant Park Community Center: December 8, 2021
- Los Altos Library: December 10, 2021
- Mini Holiday Market at State Street Market: December 20, 2021
- Woodland Library: January 5, 2022
- Draegers: February 25, 2022
- Los Altos Library: March 10, 2022
- Grant Park Community Center: March 23, 2022

Focus Group Meetings

Focus group meetings were held to gain greater insight into the highest priority housing considerations from the perspective of various interest groups, including housing developers and housing advocates. This enabled the City to better understand local challenges and opportunities that may not be effectively gathered in a larger group setting. Focus group discussions were guided by open-ended questions about fair housing issues, market characteristics, development constraints, and housing needs. Since not all invitees were able to attend the scheduled focus group meetings, questions discussed at these meetings were provided via email to all invitees to provide input at their convenience.

- Housing Advocates: December 8, 2021
- For- and Non-Profit Housing Developers: December 15, 2021

The City also conducted a meeting with the business community on April 7, 2022

Small Group Meetings

A series of over 25 small group meetings occurred from January to March 2022 which included over 120 participants and interested parties including Los Altos Village Association, Los Altos for Neighborly Development, property owners, residents, Friends of Los Altos, the Los Altos Women’s Caucus, Los Altos Affordable Housing Alliance, and others. These meetings allowed

individuals and groups to ask questions, learn more about the Housing Element update process, and provide input.

Community Workshops

Workshops provided opportunities for community input and discussion at multiple stages of the process. The first community workshop focused on listening to participants input on housing needs, constraints to housing, and housing opportunities. The second community workshop consisted of a discussion of potential housing sites and options for zoning amendments to accommodate additional housing capacity.

- Community Workshop #1: January 13, 2022 (presentation materials were translated into both Spanish and simplified Chinese)
- Community Workshop #2: March 1, 2022 (a Spanish interpreter provided interpretation services)

City Council/Planning Commission Study Sessions

Study sessions were conducted with the City Council and Planning Commission to provide opportunities for input and discussion prior to preparation of the draft Housing Element. Public comments were also provided at these study sessions.

- Planning Commission and City Council Study Session #1: December 14, 2021
- Planning Commission and City Council Study Session #2: April 26, 2022

A Planning Commission meeting was also held on February 3, 2022 to primarily discuss constraints to housing and opportunities to facilitate housing in Los Altos.

Affirmatively Furthering Fair Housing Targeted Outreach

The City conducted targeted outreach to solicit input on housing needs and challenges facing populations disproportionately impacted by fair housing issues. This included sending letters to over 200 local and regional contacts, including community organizations, schools, Foothill College, equity advisory group members, providers of fair housing organizations, the Santa Clara County Housing Authority, and local employers. Those contacted were encouraged to meet with City staff to discuss challenges and concerns faced by residents and the groups they serve or represent early in the process. Some of these contacts met with City staff as part of the Small Group Meetings discussed above, or otherwise provided comment.

The City also distributed a questionnaire or feedback form to employers aimed at soliciting feedback from the local workforce. These forms were provided in both English and Spanish.

To ensure the broadest reach, the City sought input from difficult to reach segments of the community though various methods. This included pop-up events, focus group meetings, online engagement, postcard mailers to all residents, direct mailings to service providers, street banners, and window cards at all businesses in the city. A focus group meeting was held with housing advocates that included the Community Services Agency (CSA) of Mountain View and Los Altos. The CSA largely serves the senior population in Los Altos and provided feedback regarding needs and constraints. Input and issues raised during this outreach has been integrated into the Housing Element as summarized below. Housing Element programs also include future outreach and information dissemination to all economic segments of the community, special needs populations, and lower income households, including those outside of Los Altos to support housing mobility (e.g., Programs 6.D and 6.E).

Draft Housing Element Public Review Period and Meetings

Based on input received during outreach efforts, a draft Housing Element was prepared. The draft Housing Element was available for public review from June 22 through July 24, 2022 (33 days). Notification of availability for review was advertised in the local newspaper, Housing Element Update newsletter/email distribution list, and at Planning Commission and City Council meetings. The following public meetings were held to discuss the draft Housing Element and provide opportunity for public comment:

- Planning Commission: July 7, 2022
- City Council: July 12, 2022

Public comments were also provided through the website and directly to City staff. City staff took more than 10 business days to consider and incorporate comments into the revised draft Housing Element that was submitted to HCD for review.

Draft Housing Element Study Session Post 90-day HCD Review

Based on the input received from HCD in its November 10, 2022 findings letter, the Los Altos City Council conducted a Study Session on November 29, 2022 to discuss the necessary revisions to the Draft Housing Element.

Community Engagement Efforts Post 90-day HCD Review

- November 18, 2022 – Small Group Meeting with the Los Altos Affordable Housing Alliance
- November 30, 2022 – Small Group Meeting with Nonprofit Dignity Moves a Bay Area Transitional and Supportive Housing Developer
- December 7, 2022 – Presentation and Q&A to Los Altos Chamber of Commerce
- December 12, 2022 – Small Group Meeting with Los Altos Seniors

- December 16, 2022 – Presentation and Q&A to Los Altos Community Coalition
- December 16, 2022 – Small Group Meeting with Los Altos Residents
- December 16, 2022 – Presentation and Q&A to League of Women Voters

Summary of Public Comments

A summary of key themes from public comments is presented below. Please see Appendix E for comprehensive summaries from the community workshops, focus group meetings, and draft Housing Element meetings.

- There are not enough new housing units being built in Los Altos.
- The mix of housing types in Los Altos is limited. There is a need for affordable housing in a range of sizes and types.
- The City should prioritize new housing in areas that have transit, are walkable, and have access to services, schools, and businesses.
- Housing should be available for critical or essential workers like firefighters, City staff, and teachers.
- Housing should be attainable for commuters living outside of Los Altos but work in Los Altos.
- Senior housing should be provided to accommodate an aging population.
- Housing for persons with disabilities, including development disabilities, should be provided.
- Concern about the impact additional housing could have on parking, traffic, open space, trees, and privacy.
- Los Altos should protect its small-town character, and new development should be designed to consider neighboring homes.
- Concern about neighborhood commercial areas converting into residential.
- Support for converting offices into residential.
- Parking requirements are a significant constraint to housing development, such as in Downtown.
- ADU approvals should happen more quickly; the processing of ADUs should be streamlined. The City needs to eliminate the Planning Division “pre-review” of ADUs.
- The City should allow greater flexibility of housing developments to allow for varying architecture; “the standards are too prescriptive”.
- The City should allow a variety of dense affordable housing. Higher density should be allowed along El Camino Real.

- The City's development review process should be more efficient, and the story pole requirement removed. During the public review period, both support and opposition were voiced for removing the story pole requirement (i.e., Program 3.L).
- The City Council should not have final review of development. Los Altos should be like other cities where Planning Commission is the only review. During the public review period, both support and opposition were voiced for reducing the City Council's role in development review (i.e., Program 3.H).
- New homes should be energy efficient in their design and construction.
- The City should plan for infrastructure needs (water, schools, traffic, etc.) when considering new housing.
- Support for the draft Housing Element, including the proposed programs for rezoning addressing parking.
- Concern about rezoning the Office Administrative (OA) District to allow for housing related to parking and potential building heights and lot dimensions.
- Comments related to the Village Court parcel zoning and the program to rezone it to allow for higher density (Program 1.F).
- Support for including church parking lots as housing sites.
- Suggestions for additional potential sites.
- Concern about including grocery stores as housing sites and the distribution of sites throughout the city.
- Concern about various issues with the 2100 Woods Lane site (APNs 34204089 and 34204078), including riparian area, topography, and ingress/egress.

Integration of Comments into the Housing Element

The comments provided have been incorporated and addressed in the updated Housing Element, specifically through the Housing Needs Assessment (Appendix A), the Sites Inventory and Methodology (Appendix B), Affirmatively Furthering Fair Housing (Appendix F), and through programs. Additionally, the City expanded outreach efforts to directly target underrepresented populations and populations disproportionately impacted by fair housing issues based on comments received early in the process. Various programs that address comments include the following:

- Rezone land to allow more opportunity for housing throughout the city, including areas served by transit (various programs under Goal 1).
- Allow for and encourage a variety of housing types to accommodate housing needs, including removing minimum unit size requirements (Programs 1.E and various programs under Goals 3 and 4).

- Incentivize housing for special needs groups, including seniors and people with disabilities, including developmental disabilities (Program 4.H).
- Develop a reasonable accommodation ordinance and promote resources to assist seniors in maintaining and rehabilitating their homes (Programs 4.F and 4.G).
- Facilitate alternate modes of transportation for residents throughout the city to encourage walking, biking, and transit use, and to help meet the needs of seniors and persons with disabilities (Program 4.J).
- Prepare a parking plan for Downtown and update parking requirements to reflect best practices, meet community needs, and facilitate housing (Program 3.A).
- Allow residential within the Office Administrative Zone to allow existing office space to convert or add housing to existing developments (Program 1.C).
- Encourage and streamline ADUs through various actions, including standard ADU building plans (Program 2.D).
- Remove the density limit along El Camino Real (Commercial Thoroughfare Zone) (Program 1.B).
- Amend the design review process and requirements, including removing the story pole requirement and having City Council function as an appeal body only (Programs 3.H and 3.L).
- Promote sustainability measures in housing through implementation of the City's Climate Action and Adaptation Plan and raising awareness (Program 7.A).
- Create development standards for the Rancho Shopping Center and Woodland Plaza sites, where grocery stores exist and restrictive FAR standards would be removed, that require both commercial and residential (Program 3.C).

I.F Consistency with Other General Plan Elements

The Housing Element is one of the eight elements of the City's General Plan, a long-range vision document that provides guidance for future development in Los Altos. City Council adopted its General Plan in 2002. For the General Plan to provide effective guidance on land use issues, the goals, policies, and programs of each element must be internally consistent with other elements. This Housing Element builds upon the existing General Plan and is consistent with its goals and policies. Various Housing Element programs require Zoning Code amendments, and some will require amendments to the General Plan for consistency. As those Housing Element programs are implemented, the General Plan will be amended concurrently to ensure consistency across planning documents. In the event an element of the General Plan is amended, the City will consider the impacts of the amendment on the other elements to maintain consistency across all documents.

I.G Other Statutory Requirements

Water and Sewer Priority

Government Code §65589.7 requires each public agency or private entity providing water or sewer services to grant a priority for the provision of these services to proposed developments that include lower income housing units. In Los Altos, water service is provided by the California Water Service Company and the Santa Clara Valley Water District, while sewer services are provided by the City of Los Altos Public Works Department in concert with the Palo Alto Regional Water Pollution Control Plant. The City has not denied, applied conditions, or reduced the amount of sewer service for a development that includes housing affordable to lower-income households consistent with State law. As part of this Housing Element, the City will continue to comply with these requirements (see Program 2.F).

Government Code §65589.7 also requires adopted housing elements to be immediately delivered to all public agencies or private entities that provide water or sewer services for municipal and industrial uses, including residential. The City will provide the future adopted housing element to the California Water Service Company, Santa Clara Valley Water District, and Palo Alto Regional Water Pollution Control Plant.

Section II Projected Housing Need

II.A Introduction/Overview of ABAG Methodology

State Housing Element law (Government Code §65580 et. seq.) requires regional councils of governments to identify for each member jurisdiction its "fair share allocation" of the Regional Housing Needs Assessment provided by the California Department of Housing and Community Development (HCD). In turn, each city and county must demonstrate the capacity to accommodate their local share of regional housing needs in the community's housing element. Each jurisdiction's responsibility for meeting the overall regional housing need is established as a Regional Housing Needs Allocation (RHNA).

The Association of Bay Area Governments (ABAG), the council of governments for the Los Altos area, adopted its final 6th Cycle RHNA allocation methodology in December 2021. ABAG considered several factors in preparing the methodology, which weighed both projected and existing need. Projected need was informed by the target vacancy rate, the rate of overcrowding, and the share of cost-burdened households household growth, future vacancy need, and replacement need, while existing need considered transit accessibility and job accessibility. The distribution of the RHNA across the four income categories factored in a social equity adjustment, which allocated a lower proportion of lower-income RHNA to jurisdictions that already had a high concentration of such households in comparison to the County, as well as the goal to Affirmatively Further Fair Housing (AFFH), which adjusted the distribution of RHNA in jurisdictions considered

either very low or very high resource areas. According to Appendix 6 of ABAG's Draft RHNA Plan, Los Altos had a net zero change in RHNA on account of the equity adjustment.

II.B Santa Clara County Income Limits

The projected housing needs are broken down by income category based on definitions in the California Health and Safety Code (§50079.5). HCD calculates "acutely low", "extremely low", "very low", "low", "median", "moderate", and "above moderate" income limits, and publishes these limits at the county level. Santa Clara County's 2021 income limits for households of one to four persons are shown in Table II-1. See Appendix A, Table A-5, for a table listing income limits for households of up to eight persons.

Table II-1: Santa Clara County 2021 Income Limits

Number of Persons in Household	1	2	3	4
Acutely Low (0-15% of AMI)[1]	$15,900	$18,150	$20,450	$26,350
Extremely Low (15-30% of AMI)	$34,800	$39,800	$44,750	$49,700
Very Low (30-50% of AMI)	$58,000	$66,300	$74,600	$82,850
Low (50-80% of AMI)	$82,450	$94,200	$106,000	$117,750
Median (80-120% of AMI)	$105,900	$121,050	$136,150	$151,300
Moderate (120% of AMI)	$127,100	$145,250	$163,400	$181,550
[1]"Acutely Low" income category effective January 1, 2022.				
Source: Department of Housing and Community Development, 2021				

II.C Regional Housing Needs Allocation

The RHNA for Los Altos is shown in Table II-2. The City has a total allocation of 1,958 units for the 2023 to 2031 planning period.

Table II-2: 6th Cycle RHNA

	Los Altos		Santa Clara County		ABAG	
Income	**Number of Units**	**Percent**	**Number of Units**	**Percent**	**Number of Units**	**Percent**
Total	**1,958**	**100%**	**88,997**	**100%**	**441,176**	**100%**
Extremely Low and Very Low[1]	501	25%	32,316	25%	114,442	26%
Low	288	15%	18,607	14%	65,892	15%
Moderate	326	17%	21,926	17%	72,712	17%
Above Moderate	843	43%	56,728	44%	188,130	42%
[1] "Extremely Low" included in "Very Low" Category, assumed to be 50% of the Very Low allocation.						
Source: ABAG, LWC						

The City is not responsible for the actual construction of these units. The City is, however, responsible for creating a regulatory environment in which the private market could build unit types reflected in the RHNA. This includes the creation, adoption, and implementation of General Plan policies, zoning standards, and/or economic incentives to encourage the construction of various types of units.

Section III Housing Resources

III.A Introduction

There are a variety of resources available to support the City in implementation of its housing strategy, landowners and developers seeking to provide affordable housing, and residents in need of housing assistance in Los Altos. This Section provides a summary of land resources available to accommodate future housing in the City. The detailed housing capacity analysis and methodology is contained in Appendix B. This Section also includes a list of local, regional, State, and federal programs that provide financial and related assistance to support the City in meeting its housing goals.

III.B Land Resources

A critical part of the Housing Element is the sites inventory, which identifies a list of sites that are suitable for future residential development. State law mandates that each jurisdiction ensure availability of an adequate number of sites that have appropriate zoning, development standards, and infrastructure capacity to meet its fair share of regional housing need (i.e., RHNA) at all income levels. The inventory is a tool that assists in determining if the jurisdiction has enough land to meet its RHNA given its current regulatory framework.

Identification of Sites Suitable for Housing

The sites identified in the site inventory (Appendix B) are comprised of parcels located in various areas and zones within the City.

Each site has undergone an assessment to determine development potential and residential unit capacity given existing zoning standards, potential capacity under new zoning regulations, and development trends. For detailed information, please see Appendix B.

Summary of Adequate Sites

Table III-1 summarizes the City's methods for satisfying its RHNA. Based on accessory dwelling unit (ADU) projections, entitled and proposed projects, and available 6th Cycle sites (including a rezoning program in order to meet the City's RHNA Allocation), the City has enough capacity in all income categories.

Assumptions and methodology for this determination and a detailed list of sites are included in Appendix B.

Table III-1: Residential Development Potential and RHNA

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
RHNA	See Very Low	**501**	**288**	**326**	**843**	**1,958**
ADUs	See Very Low	16	97	161	48	322
Approved/Entitled Projects	-	6	123	38	420	587
Remaining RHNA	See Very Low	**479**	**68**	**127**	**375**	**1,049**
Site Inventory[1]	See Very Low/Low	557		168	323	1,048
Surplus/(Shortfall)	**10**			**41**	**(52)**	**(1)**
Rezone Sites (Net New)	**408**			**128**	**64**	**600**
Surplus/(Shortfall) with Rezone Sites	**418**			**169**	**12**	**599**

1. Considers net new units only.

See Appendix B (Sites Inventory and Methodology) for supporting information, including Table B-3 (entitled and approved developments, page B-5, and Tables B-10 and B-11 for sites inventory tables, pages B-24 through B-29).

Source: City of Los Altos, LWC 2022

III.C Financial and Administrative Resources

Appendix G provides a list of financial, administrative, and other resources at the local, regional, state, and federal levels to help the City address its housing needs. Availability of these resources is dependent on governmental priorities, legislation, and continued funding, which may be subject to change at any time.

III.D Opportunities for Energy Conservation

The cost of energy can greatly impact housing affordability, as energy costs can constitute a significant portion of total housing costs. High energy costs also particularly impact low-income households that are less likely to have the ability to cover increased expenses. Please refer to Appendix G to see a list energy conservation programs available at the local, regional, State, and federal levels.

Section IV Housing Plan

IV.A Goals, Policies, and Programs

The Housing Plan of the Housing Element serves as the City's strategy for addressing its housing needs. This Section describes the housing goals, policies, and programs of the Housing Element for the City of Los Altos.

Goals are aspirational purpose statements that indicate the City's direction and intent on housing-related needs. Each goal encompasses several policies, which are statements that describe the City's preferred course of action among a range of other options. Each goal also includes programs, which provide actionable steps to implement the City's goals and to further the City's progress towards meeting its housing allocation. Some programs contain quantified objectives, which represent measurable outcomes that can be used to benchmark the success of each program.

This Housing Element contains actions intended to significantly increase the amount and types of housing for all income levels in Los Altos. These efforts are expected to be initiated throughout the planning period, which is from January 31, 2023, to January 31, 2031. In accordance with State law, the City will also evaluate the progress and effectiveness of Housing Element programs on an annual basis. Together, these actions reflect the City's commitment to increasing affordable housing and improving existing housing conditions.

The following list of goals, policies, and programs includes a combination of strategies, including a continuation of existing successful policies and programs as well as new policies and programs to tackle emerging opportunities and constraints, address changes in State law, and provide innovative approaches to accommodate the larger RHNA.

Goal 1: Promote new housing construction to meet Los Altos' Regional Housing Needs Allocation (RHNA).

Policies

Policy 1.1: Diversity of Housing Types.

The City will encourage a diverse range of both market-rate and affordable housing sizes and residential densities to accommodate the varied housing needs of families, couples, and individuals.

Policy 1.2: Mixed-Use Development.

The City will encourage mixed-use development in designated zoning districts.

Policy 1.3: New Rental Units.

The City will encourage the development of new rental units in multi-family districts.

Programs

Program 1.A: Rezone for RHNA shortfall.

To accommodate the remaining above moderate-income RHNA of 52 units, the City will identify and rezone sufficient vacant land or land with redevelopment potential to provide capacity for this shortfall. Appendix B (Sites Inventory and Methodology) identifies potential parcels for rezoning to address this shortfall and provide excess capacity throughout the planning period. Separate programs detail specifics of various rezoning actions that would provide additional capacity for all income levels.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: Sites rezoned to address shortfall by January 2024
Objective: The City will amend the Zoning Map and/or Zoning Code to create the opportunity for at least 52 above moderate-income housing units

Program 1.B: Facilitate higher density housing in the Commercial Thoroughfare (CT) District.

The Commercial Thoroughfare (CT) Zone is located along El Camino Real with a maximum density of 38 units per acre and a maximum height of 45 feet. Development trends in this area are showing much higher densities and heights being built. To continue to facilitate housing in the CT District, the City will remove or increase the density maximum and increase the height allowed in the CT District by at least 10 feet and one story which will result in a maximum height of 55 feet and 5-stories to ensure the increased maximum density can be accommodated. Objective design standards for the CT District will be modified as necessary to accommodate higher density.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: December 2024
Objective: Approve housing development projects along El Camino Real at densities above 38 units per acre anticipating at least 50 total housing units with at least 10 low-income units.

Program 1.C: Allow housing in the Office Administrative (OA) District.

The Office Administrative (OA) District, primarily located along South San Antonio Road (east of Downtown), does not currently allow residential uses. However, given the high demand for housing in Los Altos and the opportunity to provide for housing in a mixed-use environment with access to transit, the sites identified in the OA District (Appendix B, Table B-11) will be amended to allow multi-family development. Residential uses will be allowed at a minimum density of 20 dwelling units per acre and a maximum density of 30 dwelling units per acre.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: December 2024
Objective: Permit housing on at least three (3) OA District parcels during the planning period comprising at least 30 total housing units with at least five low-income units in the highest resource areas of the city.

Program 1.D: Allow housing on certain Public and Community Facilities District sites and facilitate housing on religious institution properties.

Assembly Bill (AB) 1851 (2020) encourages the use of religious facility properties (including parking lots) for housing projects. Certain religious facility properties are zoned Public and Community Facilities (PCF) District, which does not allow multi-family residential. To facilitate the production of housing on religious facility sites, the City will create an overlay for two religious facility properties within the PCF District: 655 Magdalena Avenue (APN 33609023) and 625 Magdalena Avenue (APN 33609018). The overlay will allow religious institution affiliated housing development by right, at a minimum of 20 dwelling units per acre and a maximum of 30 dwelling units per acre and include parking requirements consistent with State law.

The City will conduct outreach to owners and operators of religious institution sites to raise awareness of regulations that encourage housing on such sites and encourage housing proposals.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: December 2025; outreach at least every two years (December 2025, 2027, and 2029) or until housing applications are received
Objective: Facilitate an application for at least 10 units of housing for lower income and/or special needs households on religious institution site(s) during the planning period

Program 1.E: Update the Loyola Corners Specific Plan.

The Loyola Corners Specific Plan will be updated or rescinded and revert to underlying zoning (CN District) to facilitate housing production. This includes removal of all standards that are more restrictive than those applicable within the CN District. Standards to be eliminated include the 20-unit density cap (enforcement of this limitation is currently precluded by the Housing Crisis Act), the dwelling unit size requirement of between 1,500 and 8,000 square feet, and the two-story height limitation in addition to a 30-foot maximum height (Resolution 2017-41). The eliminated standards will provide regulations that allow development at greater densities than what is presently allowed today, increased building heights and greater flexibility in unit sizes. The Loyola Corners Specific Plan is considered a highest resource area with the most positive educational outcomes (see Appendix F, Section F.2.5 (Access to Opportunity)).

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: December 2024
Objective: Modify or eliminate restrictive development standards within Loyola Corners Specific Plan for density, height, and unit size. Permit housing units in the Loyola Corners Specific Plan above the current 20-unit cap and with a mixture of unit sizes during the planning period. Target approval of at least 30 total housing units with at least five low-income units.

Program 1.F: Rezone Village Court parcel.

To facilitate housing, the Village Court parcel at 4546 El Camino Real (APN 16712042) will be rezoned from R1-10 to Commercial Thoroughfare (CT), and modifications made to the Planned Unit Development (62-PUD/C7), as necessary for consistency with the CT District. The City will consult with adjacent property owners and interested parties throughout the Village Court rezone program.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: December 2025

Program 1.G: Rezone housing sites from previous Housing Elements.

Under AB 1397, certain rezoning requirements apply if a lower income housing site identified in the sites inventory (Appendix B) was identified as a housing site (for any income level) in a previous housing element's site inventory. The following vacant and nonvacant lower income sites are subject to the rezoning requirements:

- Vacant lower income sites that have been included in at least two consecutive housing element sites inventories.
- Nonvacant lower income sites that have been included in a prior housing element sites inventory.

The City will make necessary zoning amendments to allow development by right pursuant to Government Code §65583.2(i) when 20 percent or more of the units are affordable to lower income households on sites identified in Table IV-1.

Table IV-1: Previous Housing Element Cycle Sites to be Rezoned

Address	APN	Parcel Size (ac)	Zone	Lower Income Units Capacity[1]
El Camino Real	17003084	0.54	CT	22
4844 El Camino Real	17002023	0.55	CT	22
5000 El Camino Real	17004050	0.62	CT	25
4546 X El Camino Real	16712047	1.69	CT	67
4546 El Camino Real	16712042*	2.78	R1-10*	111

[1]These figures represent the total units accounted for after implementation of Program 1.B to increase density in the CT District (not net units arising from that Program). Currently, prior to implementation of Program 1.B, the CT District allows a density of 38 dwelling units per acre.

* To be rezoned CT. See Program 1.F above.

Source: City of Los Altos, Santa Clara County Assessor, LWC

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: January 2024

Program 1.H: Facilitate housing on City-owned sites.

The City will facilitate development of housing on City-owned sites through public-private partnerships during the planning period. City-owned Downtown Parking Plazas 7 and 8 were identified as opportunity sites that could accommodate new development, including affordable housing. The first RFP issued by the City for housing on either Parking Plaza 7 or 8 will be affordable housing and the City will commit to selecting the development proposal that maximizes public benefit in creating additional affordable housing in Downtown Los Altos. Prior to the RFP issuance, the City shall hire a third-party to analyze what the minimum financially feasible affordable housing production could be, based upon a minimum of 20 years of a zero-cost land lease and a commitment to provide a minimum 55-year lease. In the event the development is 100 percent affordable as defined by law, the City shall waive all applicable development impact

fees per Program 2.C. The City will comply with all Surplus Land Act requirements. The City will provide a dedicated project planner to facilitate an expedited project review process.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund, State or federal grant funds (if available).
Time Frame: Financial analysis for Parking Plaza 7 and 8 by independent third-party consultant by the end of 2023; release request for proposals by December 2023; complete entitlements within one (1) year of application if not sooner (by December 2026)
Objective: The City will enter into a public-private partnership for development of housing on at least one of the City's Downtown parking plazas.

Program 1.I: Incentivize Downtown lot consolidation.

In certain portions of Downtown, particularly along Main Street and State Street, the presence of small lots, fragmented ownership pattern, and lack of ability to provide on-site parking may constrain future development. Considering other programs addressing governmental constraints (see programs under Goal 3), the City will evaluate and adopt (through the Zoning Code or by resolution, as appropriate) complementary incentives to further encourage lot consolidation in Downtown. This may include expedited application processing, reduction in application fees, reduction in permit fees, or other incentives. The City will promote the lot consolidation incentives on the City's website and through regular updates at the Planning Commission and City Council public meetings. Additionally, Policy 3.7 in the Community Design & Historic Resources Element of the General Plan will be modified for consistency with this Program.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: Adoption of incentives and amendment of Community Design & Historic Resources Element by July 2026; promotion to occur annually thereafter.

Program 1.J: Produce annual housing status reports.

Provide an annual status report to the City Council and California Department of Housing and Community Development (HCD) on the status of the General Plan housing programs and their implementation as required by State law. This status report will also address no net loss requirements as necessary throughout the planning period.

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: Annually by April 1 (submitted to HCD)

Program 1.K: Participate in regional housing needs planning efforts.

The City will actively participate in the Association of Bay Area Governments (ABAG) Regional Housing Needs Determination and other regional discussions about meeting housing needs. The City will meet with ABAG staff to provide land use, housing, employment, and other information related to the RHNA formula to ensure that the allocation accurately represents Los Altos' fair share of the region's housing needs.

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: Ongoing

Program 1.L: General Plan amendments.

To ensure consistency between the City's General Plan and the Zoning Code, the City will amend the General Plan to allow the uses and densities as proposed in all Housing Element programs.

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: See various rezoning programs above.

Program 1.M: SB 9 implementation.

In December 2021, the City established objective standards to implement Chapter 162, Statutes of 2021 (SB 9), effective January 1, 2022. Consistent with these objective standards, the City will continue implement SB 9 in compliance with State law. The City will continue to annually monitor the effectiveness and appropriateness of existing adopted policies and update the ordinance as needed and will ensure that its local ordinance remains consistent with State law, but will apply current state law even before local amendments are adopted.

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: Ongoing

Program 1.N: Facilitate and monitor pipeline housing projects.

To ensure completion of the entitled or proposed (i.e., pipeline) projects identified in Table B-3 of Appendix B: Sites Inventory & Methodology within the planning period (by January 31, 2031), the City will monitor progress of these projects and will coordinate with applicants to facilitate remaining approvals and permits. If a pipeline project is not approved, the City will ensure adequate capacity for the remaining RHNA is provided through monitoring of no net loss during annual reporting (see Program 1.J).

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: Ongoing

Goal 2: Facilitate affordable housing to accommodate the housing needs of moderate- and lower-income households.

Policies

Policy 2.1: New Affordable Housing Units.

The City will facilitate the development of new affordable housing units.

Policy 2.2: Affordable ADUs.

The City will encourage the development of affordable Accessory Dwelling Units (ADUs).

Programs

Program 2.A: Continue to implement and enhance inclusionary housing requirements.

The City will continue to implement inclusionary housing requirements. The City will also evaluate these requirements to assess their effectiveness in meeting the City's goals and objectives in the Housing Element. Specifically, the City will assess the following:

- Inclusionary housing rates (e.g., 15 and 20 percent).
- Affordability levels, including proportions of extremely low, very low-, low-, and moderate-income units, with the potential for an alternative mix of affordability allowed if it would better meet housing policy objectives. For example, if a project provided deeper affordability, and/or resulted in the production of units suitable for special needs groups such as seniors or persons with disabilities, including those with developmental disabilities.
- Affordability terms, including requiring the longest term allowable for both rental and ownership inclusionary units.

The evaluation will result in strategies and amendments to support the production of affordable housing more effectively through inclusionary housing. Although the City does not currently accept in-lieu inclusionary housing fees, under Program 2.B below, the City will establish in-lieu fees to offer options to housing developers.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: Complete evaluation and adopt amendments by end of year 2023
Objective: Inclusionary housing unit production of at least 40 moderate-income units, 25 low-income units, and five very low-income units.

Program 2.B: Establish an affordable housing in-lieu fee and commercial linkage fee.

The City will conduct a feasibility analysis to support the establishment of an affordable housing in-lieu fee for residential developments and a commercial linkage fee for affordable housing. Based on this analysis, the City will adopt such fees. Said analysis will also ensure that the in-lieu fees adopted are not a constraint to housing development. As a part of the establishment of an affordable housing in-lieu fee and commercial linkage fee the City will conduct outreach to all stakeholders including residents, property owners, and housing and commercial developers.

Responsible Body: Development Services Department, City Council, Planning Commission
Funding Source: General Fund
Time Frame: Adopt housing in-lieu fee by the end of 2023; begin commercial linkage fee for affordable housing by end of year 2025.

Program 2.C: Assist in securing funding for affordable housing projects.

To promote the development of affordable housing projects, and when requested by the project sponsor, the City will continue to assist in securing funding for low- and moderate-income housing developments through the following actions (all of the incentives below are currently in place except for providing funding for multi-jurisdictional housing finance programs and partnering with nonprofit housing developers):

- Apply for State and federal funding on behalf of a nonprofit, under a specific program to construct affordable housing including persons with physical disabilities or developmental disabilities.
- Provide financial incentive waiving City fees for 100 percent affordable housing projects.
- Provide a dedicated project planner for 100 percent affordable housing projects.

- Transfer the City's annual CDBG allocation to the County for projects that serve the Los Altos community.
- Allocate a portion of CDBG funds toward affordable housing development.
- Provide funding to participate in a multi-jurisdictional housing finance program (such as a Mortgage Revenue Bond or Mortgage Credit Certification Program). The City will continue to coordinate with Santa Clara County and other agencies on multi-jurisdictional housing finance programs.
- Partner with nonprofit housing developers to facilitate the development of affordable housing.

The City will also promote incentives through outreach to developers, specifically by hosting a developers roundtable annually to inform developers of available incentives and encourage affordable housing development.

Responsible Body: Development Services Department, City Council
Funding Source: State or federal grant funds, General Fund
Time Frame: Ongoing; developers roundtable annually

Program 2.D: Encourage and streamline Accessory Dwelling Units (ADUs).

The City will continue to promote ADU production through streamlined review and clear informational resources, including handouts and other materials. To increase the number of ADU's constructed, the City will:

- Prepare permit ready standard ADU plans with a variety of unit sizes, bedroom count, and architectural styles.
- Publicize and promote the standard ADU plans through multiple outreach methods and languages, targeting single-family households and neighborhoods. Outreach material will also include fair housing information (e.g., source of income protection).
- Remove any barriers in the review process of an ADU (a preliminary planning review was previously required; the City has eliminated this requirement and will continue to no longer require the preliminary planning review).
- Ensure ministerial processing of all ADUs.
- Hire one additional planning staff position to review ministerial applications which includes ADUs.
- Promote the availability of funding for ADUs, including the CalHFA ADU Grant Program that currently provides up to $40,000 to reimburse homeowners for predevelopment costs necessary to build and occupy an ADU.
- With completion of a comprehensive fee study (see Program 3.D), the City will adopt a zero cost ($)) permit fee for ADUs to incentivize the creation of ADUs.

- Amend the ADU ordinance to comply with State law, pending formal comment from HCD.
- Annually review ADU ordinance for compliance with State law, and process any necessary amendments within six months.

The City will also monitor ADU production and affordability throughout the planning period and implement additional action if target ADU numbers are not being met.

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: Ongoing; if ADU targets are not being met by January 2027, the City will review and revise efforts to increase ADU construction (e.g., fee waivers, local financing program for ADUs, etc.) no later than July 2027. Outreach will occur annually, targeting single-family households and neighborhoods. The City's action shall be commensurate with the level of shortfall from construction targets (i.e., if shortfall is significant, a rezoning action may be required, if shortfall is slight, additional incentives may be appropriate). Additional planning staff position will be budgeted and hired by the end of 2022. The City will release an RFQ by July 2023 for permit ready standard ADU plans; by the end of year 2024 the City will have adopted standard ADU design plans. The City will adopt amendments to the ADU ordinance six months from receipt of HCD's formal comment letter.
Objective: Adopt and provide City Standard Permit Ready ADU Plans (2024). 322 ADUs by the end of the planning period with at least 80 percent of ADUs located in the highest resource areas of the city.

Program 2.E: Conduct annual ADU rental income surveys.

The City will conduct annual ADU rental income surveys whereby each property owner may voluntarily share the rental income for the unit for the City to use in its annual progress reports consistent with Zoning Code Section 14.14.090. The City will provide additional staff support by the onboarding of a Housing Manager or look to consultant services to provide this support at the appropriate capacity needed.

Responsible Body: Development Services Department
Funding Source: General Fund; potential State or federal grants
Time Frame: Annually, March 2023 to provide funding for in-house staff or consultant services

Program 2.F: Water and Sewer Service Providers.

Pursuant to Chapter 727, Statues of 2004 (SB 1087), the City of Los Altos upon completion of an amended or adopted housing element, is responsible for immediately distributing a copy of the housing element to area water and sewer providers. The legislation allows for coordination between the City and water and sewer providers when considering approval of new residential projects. Water and sewer providers must grant priority for service allocations to proposed developments that include housing units affordable to lower-income households. Chapter 727 was enacted to improve the effectiveness of the law in facilitating housing development for lower-income families and workers.

Responsible Body: Development Services Department, Public Works Department
Funding Source: General Fund
Time Frame: December 2023

Goal 3: Remove constraints to the development of housing.

Policies

Policy 3.1: Promote Housing Through City Regulation.

Promote housing goals through City codes, ordinances, and policies that enable housing production.

Policy 3.2: Modify Zoning Code to Assist in Meeting Housing Needs.

Ensure that Zoning Code provisions assist in meeting the housing needs of residents, including those with special needs.

Policy 3.3: Expedite Entitlement Review.

Continue to expedite the processing and review time by the City to the maximum extent possible.

Policy 3.4: Ensure Adequate Staffing Levels.

Evaluate staffing levels and ensure an appropriate number of staff available.

Programs

Program 3.A: Prepare a Downtown parking plan and update citywide parking requirements.

To address all parking constraints, the City will analyze and update parking requirements citywide and implement a Downtown parking plan. This effort will include the following:

- Assess parking demand, requirements, and strategies in the Downtown and citywide.

- Identify approaches to address short and long-term parking needs considering innovative parking design and strategies that support efficient use of land.
- Reflect that the City will support consolidation of City-owned parking plazas.
- Prepare a Downtown parking plan and modify parking requirements to reflect this plan, and reflect ensuring that overflow parking does not spill over into adjacent residential only districts.
- Revise parking standards citywide for commercial (mixed-use) and multi-family residential zones to implement a sliding scale based on unit size (number of bedrooms).
- Amend the City's parking requirements based on the assessment's findings. This may include reducing parking rates, including guest parking rates; offering further reduced rates for properties participating in a public parking district; establishing lower parking rates for small units (e.g., studios, single-room occupancy units, etc.) and senior housing, housing for persons with disabilities, deed-restricted affordable housing, etc.; providing more flexibility related to the underground parking requirement; offering other alternatives to comply with parking requirements; and modifying the required parking design dimensions (e.g., parking stall and lane dimensions).

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund, Parking In-Lieu Fees, Public-Private Partnership
Time Frame: December 2024

Program 3.B: Modify building height in mixed-use zoning districts.

Various mixed-use zoning districts limit development to 30 feet or no more than two stories. To facilitate housing development in mixed-use zoning districts, the City will amend the Zoning Code to increase allowed building heights as referenced in the Downtown Vision Plan height recommendation section, at minimum if not greater, than the following:

- *First Street and San Antonio District*
  - Standalone Residential: 40 feet, 4-stories
  - Mixed-Use: 45 feet, 4-stories
- *Edith District*
  - Standalone Residential: 40 feet, 4-stories
- *Main and State Street District*
  - Mixed-Use: 35 feet, 3-stories

The City will then evaluate and update allowed heights in the Commercial Neighborhood (CN) District at minimum allowing an additional 10 feet and one story to maintain first floor commercial

uses and accommodate residential uses on upper floors to be provided as mixed-use development. This effort will include modifying existing objective design standards as necessary to accommodate anticipated housing capacity while addressing community design goals.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: Amendments to Zoning Code for increased building heights in downtown by December 2023; zoning code amendments to increase allowed heights in Commercial Neighborhood (CN) District by December 2024

Program 3.C: Remove floor-to-area ratio (FAR) restriction at Rancho Shopping Center and Woodland Plaza.

The City will remove the site-specific 0.35 floor-to-area ratio (FAR) limitation applicable to the Rancho Shopping Center and Woodland Plaza, as the FAR limit presents a constraint to housing and is more restrictive than the FAR standard in the Commercial Neighborhood (CN) District. The City will create new development standards reflective of a mixed-use zone that requires both commercial and residential uses for the Rancho Shopping Center and Woodland Plaza properties.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: December 2024
Objective: Remove site-specific 0.35 floor-to-area ratio (FAR), and create development standards that require both commercial and residential uses for the Rancho Shopping Center and Woodland Plaza properties to incorporate needed housing units and preserve essential shopping services.

Program 3.D: Evaluate and adjust impact fees.

The City will evaluate applying the park in-lieu and traffic impact fees on a per square foot basis rather than per unit to encourage the development of higher densities and smaller, more affordable housing units. Based on this evaluation, the City will modify impact fees in accordance with Assembly Bill 602 (AB 602) with completion of the comprehensive fee evaluation.

Responsible Body: Development Services Department, City Council
Funding Source: General Fund
Time Frame: Initiate comprehensive fee evaluation August 2023; complete comprehensive fee evaluation and modify fees December 2024

Program 3.E: Ensure that the density bonus ordinance remains consistent with State law.

Government Code Section 65915 requires that a jurisdiction adopt a local Density Bonus Ordinance consistent with State law. State Density Bonus law requires a local jurisdiction to grant an increase in density, if requested by a developer, for providing affordable housing as part of a development project. Key provisions of the law include incremental density bonuses that correspond to the percentage of housing set aside as affordable units. The law also provides reduced parking requirements and allows requests for waivers of development standards, such as increased height limits and reduced setback requirements.

The City will continue to annually monitor the effectiveness and appropriateness of existing adopted policies and update the ordinance as needed and will ensure that its local ordinance remains consistent with State law, but will apply current state law even before local amendments are adopted. The City will update its Appendix to the Affordable Housing Ordinance (Municipal Code Chapter 14.28, Article 2) to comply with State law. The City commits to continue to review and approve eligible requests under State Density Bonus law (including requests for incentives, concessions, waivers, and parking reductions) so that projects that qualify are not prevented from developing at the densities to which they are entitled.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: Amend Appendix to Affordable Housing Ordinance by December 2023.

Program 3.F: Reduce Conditional Use Permit requirement for residential mixed-use and multi-family.

To facilitate housing, the City will amend the Zoning Code to allow the following as permitted uses (and no longer requiring a conditional use permit):

- Residential mixed-use in the CN, CD, CRS, CT, and CRS/OAD districts; and
- Multi-family in appropriate areas of mixed-use districts (e.g., not on the ground floor, etc.).

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: September 2024
Objective: By allowing the residential use by-right the time for City review of and action on residential mixed-use and multi-family developments will be shortened compared to typical processing times of a conditional use permit (see Appendix C, Table C-8).

Program 3.G: Amend Conditional Use Permits findings applicable to housing developments.

Conditional Use Permit (CUP) approval is subject to findings listed in Zoning Code Section 14.80.060. CUP findings will be amended so that only objective findings and standards are applicable to housing developments, including single-room occupancy units, consistent with State law. Additionally, the City will designate the review and approval of conditional use permits for housing developments to the Authority of the Development Services Director.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: March 2024

Program 3.H: Amend design review process and requirements.

The City's Design Review Commission and Planning Commission had previously been one commission with a Design Review Committee comprised of two assigned Planning Commissioners. In recent years the purview of land use and design review was split into two separate commissions, currently the Planning Commission and Design Review Commission. The current structure of the Design Review Commission is a five-person body appointed by the City Council, while the Planning Commission is a seven-person body. Recent changes in State law drastically reduced the Design Review Commission's purview, and the City's well-developed objective design standards for a variety of development types (adopted in 2021) effectively created an Administrative Design Review that has been well implemented by City staff. In order to remove constraints arising from design review, the City will:

- Consolidate the Design Review Commission and Planning Commission into one body comprised of a maximum of seven appointed residents which will review mixed-use, multi-family and commercial developments, consistent with the majority of jurisdictions throughout the County of Santa Clara;
- Eliminate 3rd party independent architect review (which applies to projects in the downtown);
- Amend its Zoning Code to allow any design review and discretionary approvals for a project of five or fewer units to be approved by the Development Services Director;
- When hearings are required, limit the number of hearings for solely design review approval (i.e., not including subdivision maps or other applications that may be involved) to no more than three hearings;
- Develop standard conditions of approval to provide consistency and certainty to applicants and approving bodies;

- Modify its design review process and applicability thresholds so that City Council serves only as the decision-making authority for appeal of design review and land use decisions, consistent with the majority of jurisdictions throughout the County of Santa Clara;
- Clarify that decisions on appeals of housing developments must be based on objective standards consistent with State law and any appeal filed with the City shall be done within 14 calendar days post project approval; and
- Amend its Zoning Code to ensure that housing developments and emergency shelters are only subject to objective design standards consistent with State law.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: Any code amendments required to be completed by December 2023; Design Review Commission to be dismissed and duties reassigned to Development Services Director upon local adoption of the 6th Cycle Los Altos Housing Element or sooner. Evaluate progress and take additional action if improvements in the design review process have not resulted by January 2027.
Objective: The time for City review of and action on residential, mixed-use and multi-family developments will be shortened compared to typical processing times (see Appendix C, Table C-8) with the reduction of discretionary reviews and commissions.

Program 3.I: Allow residential care facilities consistent with State law.

To comply with State law, the City will amend the Zoning Code to permit residential care facilities for six or fewer persons in all residential zoning districts, as well as districts where single-family homes are allowed by-right and treat them as a residential use. The Zoning Code will also be amended to allow large residential care facilities (seven or more persons) in all residential zones without discretionary review (i.e., subject only to objective standards). Residential care facilities will not be limited to individuals of 60 years of age or over, and a barrier-free definition of "family" that encompasses unrelated individuals living together as a single residential unit will be added consistent with State law.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: March 2024

Program 3.J: Explicitly allow manufactured homes consistent with State law.

Government Code §65852.3 requires manufactured and mobile homes on a permanent foundation to be allowed in the same manner and in the same zone as a conventional stick-built structure. While it is the City's practice to treat manufactured homes on a foundation as a

conventional single-family home, the Zoning Code does not reflect this practice. The City will amend the Zoning Code to explicitly allow manufactured homes on a permanent foundation, subject to the same regulations as single-family homes and in the same zones as single-family homes.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: March 2024

Program 3.K: Standardize multimodal transportation requirements.

An application for City Council design review is subject to a multimodal transportation review by the Complete Streets Commission as part of the approval process in order to assess potential project impacts to various modes of transportation. The City will streamline the Development Review process for multi-family housing projects by adoption of Development Standards for multimodal transportation such as bicycle, pedestrian, parking traffic and public transportation issues. The development of standards will no longer require housing development projects to be reviewed by the Complete Streets Commission. The City Council will utilize previous recommendations and approvals as a basis for the creation of the development standards in consultation with the appointed Complete Streets Commission. A recommendation by the Complete Streets Commission on Bicycle Stall, Storage and Charging shall be made timely and considered at no more than two hearings; final recommendation to the City Council shall be made no later than May 2023.

Responsible Body: Development Services Department, Complete Streets Commission, City Council
Funding Source: General Fund
Time Frame: December 2023
Objective: See Program 3.H.

Program 3.L: Eliminate the requirement of story poles.

The requirement of story poles adds subjectivity, extends the review process of all development, and adds to the additional cost of a project. Existing submittal requirements include, renderings and 3D Modeling which effectively provide the same information story poles would (the relationship of the proposed building heights). The requirement of story poles installations will be eliminated for all development applications.

Responsible Body: Development Services Department, City Council
Funding Source: General Fund
Time Frame: March 2023

Program 3.M: Modify parking requirements for emergency shelters consistent with State law.

The City will amend its Zoning Ordinance to only require parking necessary for emergency shelter staff consistent with Government Code §65583(a)(4)(A).

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: December 2024

Program 3.N: Modify standards in the R3 zoning districts.

The City will amend its Zoning Ordinance to allow building heights of 35 feet and three stories in all R3 zoning districts. The City will also increase allowed site coverage in the R3 zoning districts to ensure maximum densities can be achieved.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: December 2026

Goal 4: Create housing opportunities for people with special needs.

Policies

Policy 4.1: Support Local Homeless Service Providers.

The City will support the efforts of Santa Clara County and local social service providers to increase their capacity to operate facilities serving the homeless.

Policy 4.2: Allow Special Needs Housing Consistent with State Law.

The City will comply with all State legal requirements pertaining to zoning provisions for homeless shelters, transitional housing, and supportive housing, and single-room occupancy (SRO) housing.

Policy 4.3: Encourage Independent Living.

The City will promote services and education to help seniors maintain their independence and remain in their own homes as long as possible.

Policy 4.4: Discourage Senior Housing Conversion.

The City will discourage senior-only housing from converting to other uses.

Policy 4.5: Transportation Options.

The City will encourage senior housing and housing for persons with disabilities near transportation and services.

Policy 4.6: Variety of Housing Types.

The City will encourage a variety of housing opportunities, including building type, degree of care, and form of ownership to support housing for all, including persons with disabilities.

Programs

Program 4.A: Support efforts to fund homeless services.

The City continues to transfer its CDBG funds to the County to support local housing programs, including programs to support people experiencing homelessness. In addition, the City will continue to pursue funding from available sources for homeless services and will also assist community groups that provide homeless services and assist such groups in applying for funding from other agencies. Moreover, the City will consider applying for grants where appropriate or will encourage/partner with local and regional nonprofit organizations that wish to apply for such grants. Lastly, the City will promote the availability of these services on its website, social media, by email, and with handouts.

Responsible Body: Development Services Department
Funding Source: CDBG funds (as transferred to the County and applied to the City program)
Time Frame: Ongoing

Program 4.B: Continue to participate in local and regional forums for homelessness, supportive, and transitional housing.

Continue to participate in regional efforts as coordinated with other adjacent cities to address homeless and emergency and transitional housing issues and potential solutions. In addition to transferring its CDBG funds to the County (see Program 4.A), the City provides funding for the Community Services Agency (CSA) of Mountain View and Los Altos that provides various housing services.

Responsible Body: Development Services Department, City Council, Community Services Agency
Funding Source: General Fund, CDBG funds (as transferred to the County and applied to the City program)
Time Frame: Ongoing

Program 4.C: Allow Low Barrier Navigation Centers consistent with AB 101.

The Zoning Code does not address low barrier navigation centers (LBNCs), defined as Housing First, low-barrier, service enriched shelters focused on moving people into permanent housing that provide temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing (Government Code §65660). State law requires LBNCs to be permitted by-right in areas zoned for mixed-use and nonresidential zones permitting multifamily uses provided they satisfying the provisions established by AB 101 (see Government Code §65662). This would allow LBNCs in the CD/R3, CN, CD, CRS, CT, and CRS-OAD districts. The City will amend its Zoning Code to explicitly allow LBNCs as provided by State law.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: December 2023.

Program 4.D: Allow transitional and supportive housing consistent with State law.

Allow transitional and supportive housing by right in all zones which allow residential uses, subject only to those restrictions and standards that apply to other residential dwellings of the same type in the same zone, consistent with State law. Additionally, transitional and supportive housing that qualifies under AB 2162 will be allowed by right in zones where multi-family and mixed uses are allowed, including nonresidential zones that allow multi-family uses, consistent with AB 2162 (Government Code §65651)

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: December 2023

Program 4.E: Allow employee/farmworker housing consistent with State law.

The City will amend the Zoning Code to allow employee housing consistent with Health and Safety Code §17021.5 and 17021.6.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: December 2023

Program 4.F: Reasonably accommodate disabled persons' housing needs.

Both the federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning laws and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. The Zoning Code does not currently contain procedures for reasonable accommodations. The City will adopt reasonable accommodation procedures compliant with State and federal law.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: Adopt an ordinance by December 2023; report to City Council on number of reasonable accommodation requests submitted and the status of each (i.e., approved, denied (and reason for denial), or under review) (annually)
Objective: The City will adopt a reasonable accommodation ordinance and process request as submitted with the target of approving at least three reasonable accommodation requests by January 31, 2031.

Program 4.G: Assist seniors to maintain and rehabilitate their homes.

Seek, maintain, and publicize a list of resources or service providers to help seniors maintain and/or rehabilitate their homes. Specifically, the City will update (as needed) and regularly promote the Age Friendly Design (design that promotes the mobility and welfare of aging population) Elements handout and require larger lower income developments to utilize Universal Design (allows for equitable use, flexibility in use, simple and intuitive use, etc.) standards.

Responsible Body: Development Services Department, Senior Commission
Funding Source: General Fund
Time Frame: Update Age Friendly Design handout by July 2026; publicize list of service providers annually.

Program 4.H: Provide additional density bonuses and incentives for housing that accommodates special needs groups.

Provide density bonus increases and incentives beyond that required by State law for projects that provide senior housing or housing for extremely low-income households or people with disabilities, including developmental disabilities, in multi-family or mixed-use zones. Specifically, the City will codify the additional density bonus and incentives for senior-only projects.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund

Time Frame: December 2025

Program 4.I: Allow senior housing with extended care facilities in multi-family and mixed-use zoning districts.

The City will amend Zoning Code to clearly allow senior housing under the multi-family use and residential care facilities consistent with State law.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: December 2025

Program 4.J: Facilitate alternate modes of transportation for residents.

Continue to implement City standards, policies, and funding efforts, such as the Complete Streets Masterplan adopted in the summer of 2022 to facilitate walkable neighborhoods and the safe use of alternate modes of transportation such as bicycles. For example, the City will install above head pedestrian crossing signals over San Antonio near Main Street in Downtown Los Altos. The City may also fund community service organizations to offer rides, partner with organizations to provide bicycle share services, and/or develop policies to require sidewalks and/or bicycle lanes or bicycle parking improvements in areas of need. The City will also adopt a vehicle miles travel (VMT) policy and transportation demand management plan to promote efficient land use planning and facilitate alternative modes of transportation.

Responsible Body: Development Services Department, Public Works Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: June 2023 and ongoing
Objective: Adopt VMT policy and transportation demand management plan (by June 2023) and provide walkable and safe modes of transportation to all residents. Funding for above head pedestrian crossing signals will be completed no later than December 2027.

Goal 5: Conserve and improve the existing housing stock.

Policies

Policy 5.1: Conserve Existing Affordable Housing.

The City will encourage the conservation of existing affordable housing, including the present rental stock represented by units in the city's existing multi-family districts, particularly rental housing affordable to low- or moderate-income households.

Policy 5.2: Conserve Small Homes.

The City will continue to conserve the stock of small houses in areas of small lot sizes.

Policy 5.3: Preserve and Improve Existing Housing.

The City will encourage the preservation and improvement of the existing housing stock to minimum housing standards, including existing nonconforming housing uses.

Programs

Program 5.A: Monitor condominium conversions.

The City will continue to implement the Condominium Conversion Ordinance to protect against the conversion or demolition of rental units. This Ordinance does not allow apartment buildings to be converted into condominiums unless rental vacancy is greater than five percent.

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: Ongoing
Objective: Deny condominium conversions unless compliant with the Ordinance.

Program 5.B: Continue to administer the City's affordable housing programs.

The City will continue to work with Alta Housing or other qualified entity to administer the City's affordable housing programs, including outreach and marketing. The contracted entity will continue to monitor below-market-rate units on behalf of the City. Any efforts beyond those under the existing Alta Housing contract (e.g., further preservation activities) would require additional City funding. The City shall provide funding for a full-time Housing Manager to help manage the affordable housing programs.

Responsible Body: Development Services Department, City Council
Funding Source: General Fund
Time Frame: Ongoing
Objective: Maintain accurate records of the City's affordable housing inventory and waitlists, and report annually to the City Council.

Program 5.C: Restrict commercial uses from displacing residential neighborhoods.

Continue to restrict commercial uses in residential neighborhoods so as to prevent potential future displacement of residents, while continuing to allow home occupations in residential zones, consistent with the Zoning Code.

Responsible Body: Development Services Department
Funding Source: General Fund

Time Frame: Ongoing

Program 5.D: Implement voluntary code inspection program.

Continue the voluntary code inspection program encompassing code compliance, rehabilitation, energy conservation, and minimum fire safety standards. Use the code inspection programs to promote available rehabilitation programs and services (see Program 5.E).

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: Ongoing

Program 5.E: Help secure funding for housing rehabilitation and assistance programs.

Continue to assist in the provision of housing programs and services for low-income households with other public agencies and private nonprofit organizations that offer home repairs, rental assistance, and first-time homebuyer assistance. To minimize overlap or duplication of services, Los Altos will undertake the following actions:

- The City will support County and nonprofit housing rehabilitation programs by providing program information to interested individuals through handouts available at City Hall, the Los Altos Senior Center, the Los Altos Library, and the Woodland Branch Library as well as by email, social media, and on the City website.

- The City will contact previous rehabilitation applicants when new funding becomes available and post a legal notice in the newspaper, as well as by email, social media, and on the City website, when housing rehabilitation funds become available. The City will continue to transfer their Community Development Block Grant (CDBG) funds to the County to support housing programs each year.

Responsible Body: Development Services Department
Funding Source: General Fund, CDBG funds
Time Frame: Promote available programs and funding sources annually (handouts, Los Altos Senior Center, Woodland Branch Library, email, social media, City website); ongoing
Objective: Rehabilitation of six units for low-income households during the planning period

Program 5.F: Incentivize the creation of play areas for multi-family housing projects.

The City will develop incentives for the creation of play areas for muti-family housing projects to help address the needs of children and families. Incentives could be a reduction in Park In-Lieu Fees or waiving the entire fee completely in connection to the development of onsite improvements.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: December 2027

Goal 6: Promote fair housing access and opportunities for all persons.

Policies

Policy 6.1: Promote Equal Opportunity.

Promote governmental efforts to provide equal opportunity housing for existing and projected demands in Los Altos, including the creation and management of waitlists for below-market-rate ownership and rental units.

Policy 6.2: Connect Residents with Fair Housing Services.

The City will make a proactive effort to increase awareness of fair housing services.

Policy 6.3: Promote Community Involvement in Housing Efforts.

Promote representative citizen participation in the implementation of housing programs.

Policy 6.4: Implement Anti-Displacement Measures.

Enforce the right of first refusal for residents displaced through redevelopment of existing housing stock as required by Government Code §66300(d)(2)(D)(ii).

Programs

Program 6.A: Assist residents with housing discrimination and landlord-tenant complaints.

The City presently refers discrimination complaints to the Santa Clara County Housing Authority as appropriate. If the county is not able to effectively resolve the identified fair housing issues or violations, and enforcement is necessary, tenants may be referred to the State Department of Fair Employment and Housing or HUD, depending on the complaint. In addition, the City will raise awareness of available services to address housing discrimination and landlord-tenant complaints through its website, printed handouts and in-person outreach conducted by the City's new Housing Manager.

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: Ongoing
Objective: The City will continue to promote fair housing practices, refer fair housing complaints appropriately, and raise awareness of such services. The City will advertise

available services through the City's newsletters, website, email blasts, social media, cable television channel as well as handouts at City Hall and other public buildings and facilities. The City will track awareness of fair housing services through surveys of the community and increase awareness of such services over the planning period, adjusting outreach methods based on survey results, but will ensure that outreach is conducted at least annually starting in May 2023. The City's aim is to have 100 survey respondents in the first year, and to increase survey participation by five percent with each survey and show a five percent increase in awareness of available services by survey respondents with each survey.

Program 6.B: Maintain and expand an inventory of affordable housing funding sources.

The City will prepare a comprehensive inventory of available sources of funds for affordable housing activities. The City will update and maintain this inventory so it is available to prospective housing developers. City staff will identify and prepare applications for appropriate funding sources to support affordable housing activities. As discussed in Appendix G (Housing Resources) and in Program 2.C, these sources include CDBG, Section 8 Project-Based Rental Assistance, the Mills Act program, and various State programs such as Low-Income Housing Tax Credits (LIHTC) and the Multi-family Housing Program.

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: Prepare inventory of funding sources by December 2023; inform developers of funding sources available (annually); evaluate notices of funding availability (annually); submit grant applications (at least one every three years)
Objective: The City will update and maintain the inventory of affordable housing funding sources, make it available to developers, and apply for, when appropriate, funding sources to support affordable housing activities.

Program 6.C: Target housing development in highest resource areas.

The City will outreach to property owners of housing sites in the highest resource areas including areas of the city with higher TCAC Education and Environment scores. In this outreach, the City will provide written material to property owners of identified sites describing potential residential capacity for the site, available incentives, including density bonuses and available funding. The City will disseminate this information on its website.

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: Initial outreach by September 2023; follow up outreach after completion of various zoning modifications by September 2026

Objective: Support the development of below market rate housing (i.e., lower or moderate-income housing) in Los Altos; if the City has not received an application for a below market rate.

project by December 2026, the City will enhance efforts under programs that support funding or partnerships to achieve affordable housing production. The City aims to facilitate the approval of 50 low-income units in highest resource area(s) (also see Program 1.H).

Program 6.D: Promote Housing Choice (Section 8) rental assistance program.

The Housing Choice (Section 8) Rental Assistance Program is administered by the Santa Clara County Housing Authority (SCCHA) and has about 17,000 participants. This program assists very low-income, elderly, and disabled households by paying the difference between 30 percent of an eligible household's income and the actual rental cost. The City will continue to promote participation of eligible Los Altos residents in the County-administered Housing Choice Rental Assistance Program, focusing promotional efforts to reach more lower income households, such as areas near El Camino Real, although promotion will be through various channels to reach the broadest audience. The City's promotional efforts will also target lower income areas countywide to encourage more lower-income households to relocate to Los Altos. SCCHA currently assists six households with Section 8 housing choice vouchers in Los Altos. The City's new Housing Manager will lead the promotion of Housing Choice rental assistance program within Los Altos, providing education and assistance to tenants, property managers/owners.

Responsible Body: Development Services Department, Santa Clara County Housing Authority

Funding Source: General Fund

Time Frame: SCCHA Housing Choice Rental Assistance Program link on the City's website by September 2023; promote the Program via newsletters, email blasts, social media, and other methods annually; track number of Section 8 participants annually and modify outreach efforts if target number of households is not achieved.

Objective: The City will advertise availability of the Housing Choice Rental Assistance Program on its website, newsletters, email blasts, social media, cable television channel as well as handouts at City Hall and other public buildings and facilities. Since Housing Choice vouchers are portable, the number of vouchers used in the city will vary over time, but the City's objective is to increase the number of households participating in the Section 8 program from the current level of six to 12 households.

Program 6.E: Prepare and distribute anti-displacement information.

The City will create communications materials to effectively distribute information regarding local and regional tenants' rights resources, as well as other relevant resources, in a user-friendly manner. The City will engage in a robust communications campaign to better inform residents,

especially those who are harder to reach and potentially at-risk of displacement, of these new materials. Information will be multilingual, and the City will coordinate with organizations and local groups to ensure effective distribution of information community wide (e.g., Community Services Agency of Mountain View and Los Altos, school district, etc.). This will include targeting both people who live in Los Altos and work in Los Altos.

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: Materials produced and translated into multiple languages and initial communication campaign by September 2023; continue to distribute materials on an annual basis
Objective: The City will produce anti-displacement materials and conduct outreach to notify potentially at-risk households of such resources. The City will hold at least one in-person event every two years (starting by December 2023) on fair housing rights and resources; this event will be hosted in a location where at-risk households are more easily reached and will be determined with local organizations and groups to be most effective. The goal is to educate at least 12 households or prevent at least 12 households from displacement.

Program 6.F: Affirmatively market physically accessible units.

As a condition of the disposition of any City-owned land, the award of City financing, any density bonus concessions, or land use exceptions or waivers for any affordable housing project, the City will require that the housing developer implement an affirmative marketing plan for State-mandated physically accessible units which, among other measures, provides disability-serving organizations adequate prior notice of the availability of the accessible units and a process for supporting people with qualifying disabilities to apply.

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: Ongoing as applications are processed
Objective: Affirmative marketing conducted for 100 percent of affordable housing units approved and permitted in Los Altos from 2023 to 2031.

Goal 7: Encourage energy and resource conservation and sustainability measures.

Policies

Policy 7.1: Energy and Water Conservation.

The City will encourage energy and water conservation measures to reduce energy and water consumption in residential, governmental, and commercial buildings.

Policy 7.2: Energy and Water Efficiency.

The City will continue to implement building and zoning standards to encourage energy and water efficiency.

Policy 7.3: Greenhouse Gas Reduction.

The City will continue to implement the 2022 Climate Action and Adaptation Plan to encourage reducing greenhouse gas emissions.

Programs

Program 7.A: Promote energy and water conservation and greenhouse gas reduction through education and awareness campaigns.

Continue to promote residential energy and water conservation and greenhouse gas reduction consistent with the City's adopted 2022 Climate Action and Adaptation Plan, through consumer information on financial assistance and rebates for energy-efficient home improvements published by governmental agencies, nonprofit organizations, and utility companies. This includes information on the Property Assessed Clean Energy (PACE) program that provides eligible property owner financing for energy improvements to their homes—solar panels, water-efficient landscapes, etc.—on their property tax assessment. Other programs include leveraging and promoting other State and commercial initiatives to encourage solar energy, such as grants, tax credits, and rebates, as they are implemented through organizations such as Silicon Valley Clean Energy, PG&E, BayRen, among others.

The City will make the above-described information available at the public counter of the Development Services Department, at the Los Altos Senior Center, Los Altos Library, and through the City's newsletters. The information will also be available on the City's website.

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: Ongoing

Program 7.B: Monitor and implement thresholds and statutory requirements of climate change legislation.

Monitor the implementation measures of the Global Warming Solutions Act of 2006 (AB 32) and SB 375, which requires planning organizations to promote sustainable communities as part of their regional transportation plans. The City will implement the measures as guidance for thresholds and compliance methods are released by the State, especially as reflected in its 2022 Climate Action and Adaptation Plan.

Responsible Body: Development Services Department
Funding Source: General Fund
Time Frame: Ongoing

IV.B Quantified Objectives

Table IV-2 presents the City's quantified objectives for construction, preservation, and rehabilitation for the 2023 – 2031 planning period that will be achieved through the policies and programs described above.

Table IV-2: Quantified Objectives

Program Type/Affordability	Extremely Low[1]	Very Low	Low	Moderate	Above Moderate	Total
New Construction	250	251	288	326	843	1,958
Rehabilitation	2	2	2	-	-	6
Conservation/Preservation	6	6	-	-	-	12
Total	255	256	290	326	843	**1,970**

[1] The City estimates 50% of the very low households would qualify as extremely low income.

[2] See Program 6.D. Assumes Section 8 Housing Choice Voucher recipients are split evenly between extremely low and very low income.

Appendix A: Housing Needs Assessment

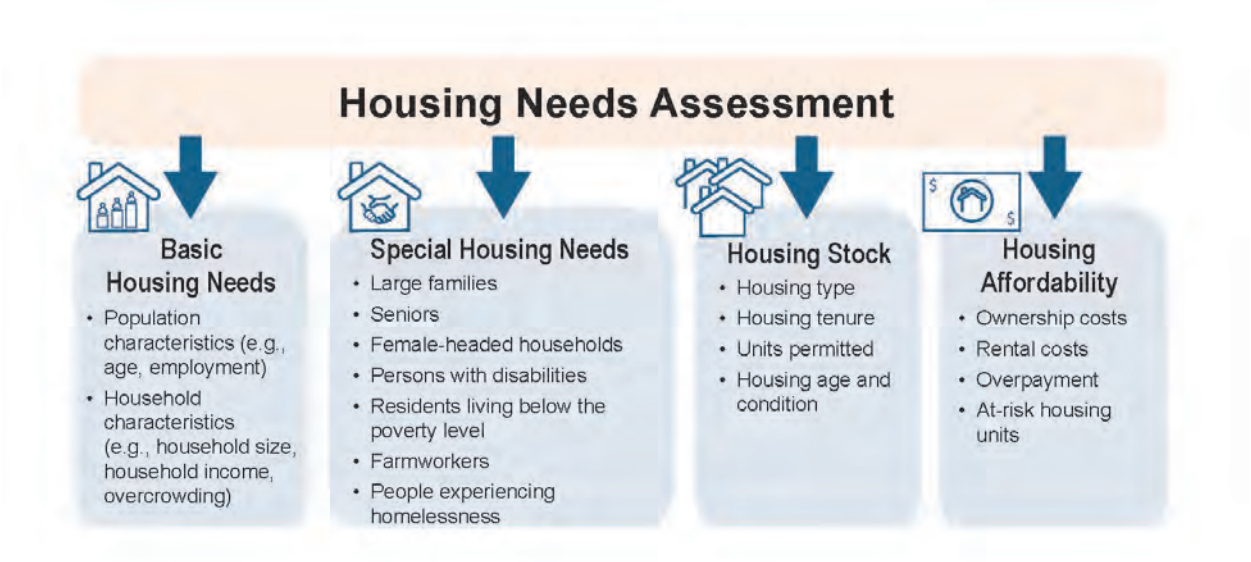
Contents

Section A.1 Introduction and Summary

A.1.1 Introduction

This Appendix forms the foundation for understanding Los Altos housing needs. It analyzes a range of demographic, economic, and housing-related variables to determine the extent and context of the city's housing-related need. Information gathered through this Appendix provides a basis from which to build housing goals, policies, and programs to address those needs.

This needs assessment includes an analysis of the city's population, special needs groups, employment, housing stock, and housing affordability.



The main source of data used to form the majority of this section is HCD pre-certified local housing data provided by ABAG, which relies primarily on the American Community Survey 2015-2019, California Department of Finance, and HUD's Comprehensive Housing Affordability Strategy ("CHAS") data. 2020 Census data has been noted and referenced in certain instances; however, due to the timing and certification requirements of the Housing Element, 2020 Census data is not fully available, and therefore has not been comprehensively integrated into this assessment.

A.1.2 Summary

Housing needs are determined by a city's population and its existing housing stock and provide context for developing housing policy, such as which types of housing and its affordability levels are most needed in the community. The following summarizes key data from this housing needs assessment.

- Los Altos has a higher income population than Santa Clara County. Los Altos' 2019 median household income ($235,278) was almost 90 percent higher than the county ($124,055). Almost 17 percent of Los Altos households are lower-income households (1,783 households), of which 7.2 percent are extremely low-income.
- Los Altos has a high rate of home ownership. Of the total housing units, four out of five households (81 percent) own their homes.
- Home prices are higher in Los Altos than in the county. Households must earn at least median wage (100 percent AMI) to afford to rent in Los Altos, and well over 200 percent of AMI to be able to buy a home in the city. Low-income households are likely to be excluded from essentially all neighborhoods in Los Altos.
- More than one in four homeowners (28 percent) and one in five renters (23 percent) are cost burdened. Furthermore, 12 percent of homeowners and 11 percent of renters are severely cost burdened. Los Altos has a lower proportion of cost-burdened households compared to the county.
- Renter households are slightly more likely to live in overcrowded conditions than owner-occupied households. 2.1 percent of renter households experience overcrowding or severe overcrowding, versus 0.4 percent of owner households. Los Altos has a lower overcrowding rate than the county.
- Los Altos has a lower proportion of residents of color than the Bay Area. Of all the racial/ethnic groups, Other or Multiple Races, American Indian or Alaska Native, and African American residents experience the highest rates of poverty in Los Altos.
- Seniors (65 years and above) comprise more than 26 percent of the population in Los Altos. The median age in the city is 46 years, nearly 10 years higher than in the county (37 years). Of total senior households, almost 37 percent are cost burdened (1,299 households). Seniors are considered a special needs group, as they can face higher levels of housing insecurity because they are more likely to be on a fixed income while requiring higher levels of care.
- Los Altos' other special housing needs population includes persons with a disability (5.7 percent of residents) that may require accessible housing and female-headed households (6.7 percent of households) who are often at greater risk of housing insecurity.
- The number of people experiencing homelessness in Los Altos increased from six to 76 individuals between 2017 and 2019. This was sharp increase compared to the county, although this homeless population represents less than one percent of the homeless population countywide.
- Los Altos has 1,112 large households (five or more people), which are generally served by three-bedroom or larger units. The number of such units in Los Altos (8,646) can sufficiently accommodate the city's share of larger families.

- A variety of housing types is important to meet the needs of all members of the community. Over 85 percent of Los Altos' housing stock is single-family (attached and detached). However, multi-family housing of five or more units has experiencing the most growth over the last decade.
- The largest proportion of Los Altos' housing units was built between 1940 and 1959, with almost 23 percent built before 1960. This represents an aging housing stock which can reflect poorer living standards and higher repair costs if not regularly maintained.

Section A.2 Population Characteristics

A.2.1 Population

The Bay Area is the fifth-largest metropolitan area in the nation and has seen a steady increase in population since 1990, except for a decline during the Great Recession beginning in 2007. Many cities in the region have experienced significant growth in both jobs and population. While these trends have led to a corresponding increase in demand for housing across the region, the regional production of housing has largely not kept pace with job and population growth. In 2020, the population of Los Altos was estimated to be 30,876 (see Table A-1). From 1990 to 2000, the population increased by 5.1 percent, while it increased by 3.6 percent during the first decade of the 2000s. In the most recent decade, the population increased by 6.6 percent (9.1 percent according to the 2020 Census). The population of Los Altos makes up 1.6 percent of Santa Clara County.[1]

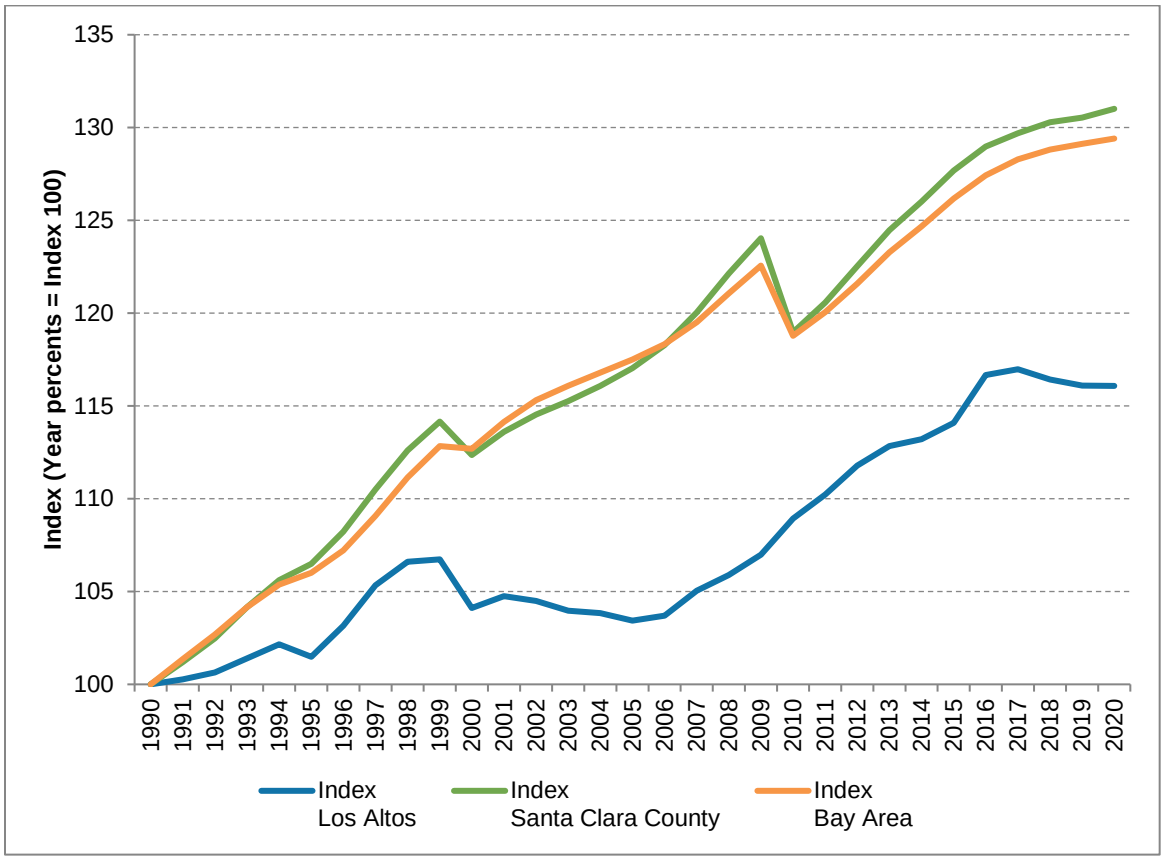
Since 2000, the population in Los Altos has increased by 11.5 percent, which is below that of the region, at 16.6 percent increase over the same period (see Figure A-1). In Los Altos, roughly 10.2 percent of its population had moved during the past year, 3.2 percentage points smaller than the regional rate of 13.4 percent.

[1] To compare the rate of growth across various geographic scales, Figure 1 shows population for the jurisdiction, county, and region indexed to the population in the year 1990. This means that the data points represent the population growth (i.e., percent change) in each of these geographies relative to their populations in 1990.

Table A-1: Population Growth Trends

	1990	1995	2000	2005	2010	2015	2020
Geography							
Los Altos	26,599	26,993	27,693	27,513	28,976	30,346	30,876 [1]
Santa Clara County	1,497,577	1,594,818	1,682,585	1,752,969	1,781,642	1,912,180	1,961,969
Bay Area	6,020,147	6,381,961	6,784,348	7,073,912	7,150,739	7,595,694	7,790,537
Notes: [1] 31,625 according to the 2020 Census.							
Source: ABAG 2021 Pre-certified Housing Needs Data (California Department of Finance, E-5 series)							

Figure A-1: Population Growth Trends



Note: The data shown on the graph represents population for the jurisdiction, county, and region indexed to the population in the first year shown. The data points represent the relative population growth in each of these geographies relative to their populations in that year. For some jurisdictions, a break may appear at the end of each decade (1999, 2009) as estimates are compared to census counts. DOF uses the decennial census to benchmark subsequent population estimates.

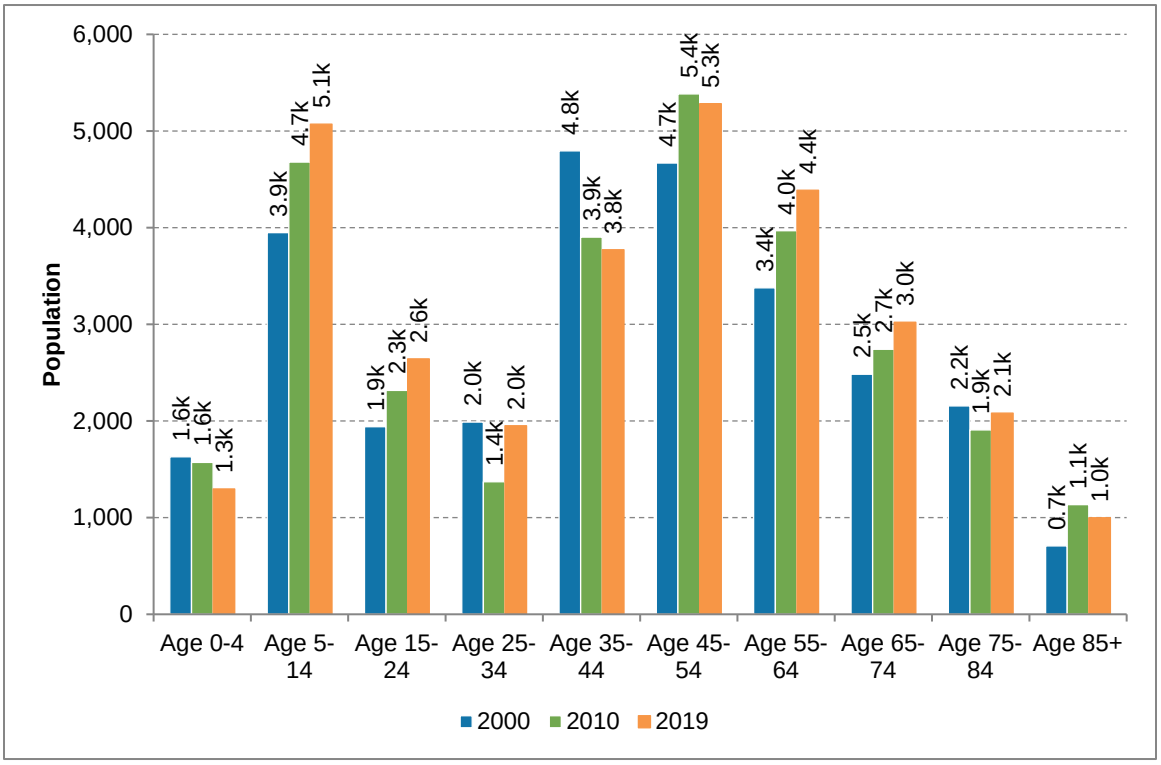
Source: ABAG 2021 Pre-certified Housing Needs Data (California Department of Finance, E-5 series)

A.2.2 Age

The distribution of age groups in a city influences the types of housing the community may need in the near future. An increase in the older population may mean there is a developing need for more senior housing options, while higher numbers of children and young families can point to the need for more family housing options and related services. Trends indicate an increased desire to age-in-place or downsize to stay within their communities, which can mean more multi-family and accessible units are also needed.

In Los Altos, the median age in 2000 was 43.1; by 2019, this figure had increased to around 46 years. The median age in the county was 37.4 for the same year. The population of seniors (65 years and above) increased just over 10.5 percent since 2000 and makes up 26.6 percent of the population. Statewide, the population of seniors comprises approximately 12 percent of total population. The population of youths (14 years and under) increased at a rate of 14.2 percent and makes up almost 21.0 percent of the total population. Conversely, the population of those ages 15-45 decreased by an estimated 4.3 percent between 2000 and 2019 and makes up 27.4 percent of the total population of Los Altos.

Figure A-2: Population by Age, 2000-2019



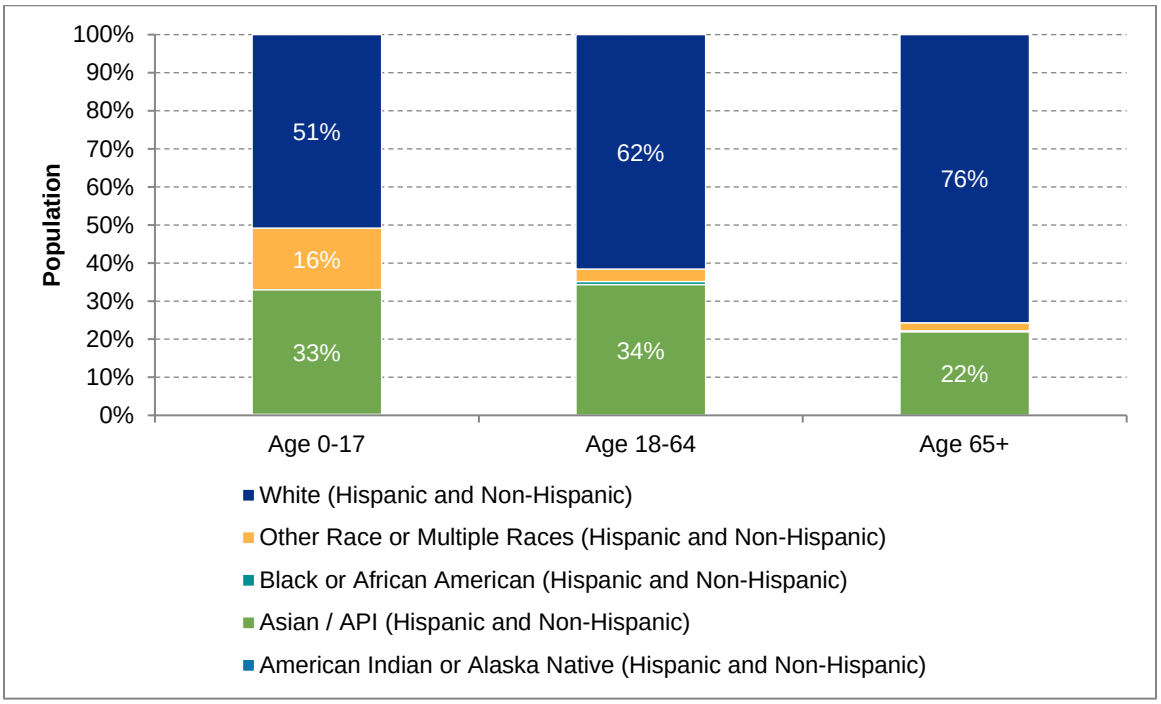
Notes:

Universe: Total population

Source: ABAG 2021 Pre-certified Housing Needs Data ((U.S. Census Bureau, Census 2000 SF1, Table P12; U.S. Census Bureau, Census 2010 SF1, Table P12; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001)

Looking at the senior and youth population by race can add an additional layer of understanding, as families and seniors of color are even more likely to experience challenges finding affordable housing. People of color (all non-white racial groups) make up 24.3 percent of seniors and 49.2 percent of youth under 18 (see Figure A-3).

Figure A-3: Senior and Youth Population by Race



Notes:

Universe: Total population

In the sources for this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity, and an overlapping category of Hispanic / non-Hispanic groups has not been shown to avoid double counting in the stacked bar chart.

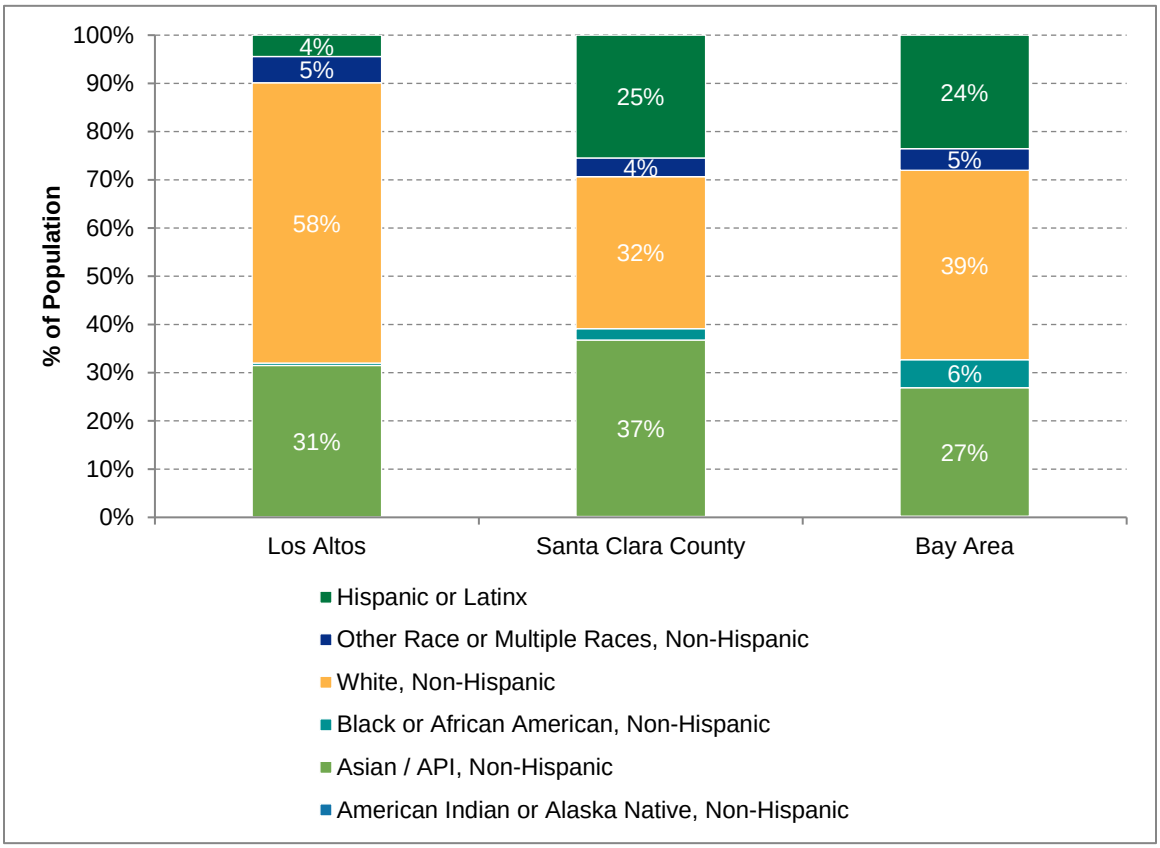
Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-G))

A.2.3 Race/Ethnicity

Understanding the racial makeup of a city and region is important for designing and implementing effective housing policies and programs. These patterns are shaped by both market factors and government actions, such as exclusionary zoning, discriminatory lending practices and displacement that has occurred over time and continues to impact communities of color today.

Los Altos has a higher share of residents identifying as White, Non-Hispanic than the county and region and a smaller share of residents identifying as American Indian or Alaskan Native, Black or African American, and Hispanic or Latinx when compared to the county and region. Los Altos also has a higher share of residents identifying as Asian/API than the rest of the Bay Area region, but a smaller share compared to Santa Clara County (see Figure A-4).

Figure A-4: Population by Race, 2019



Notes:

Data for 2019 represents 2015-2019 ACS estimates.

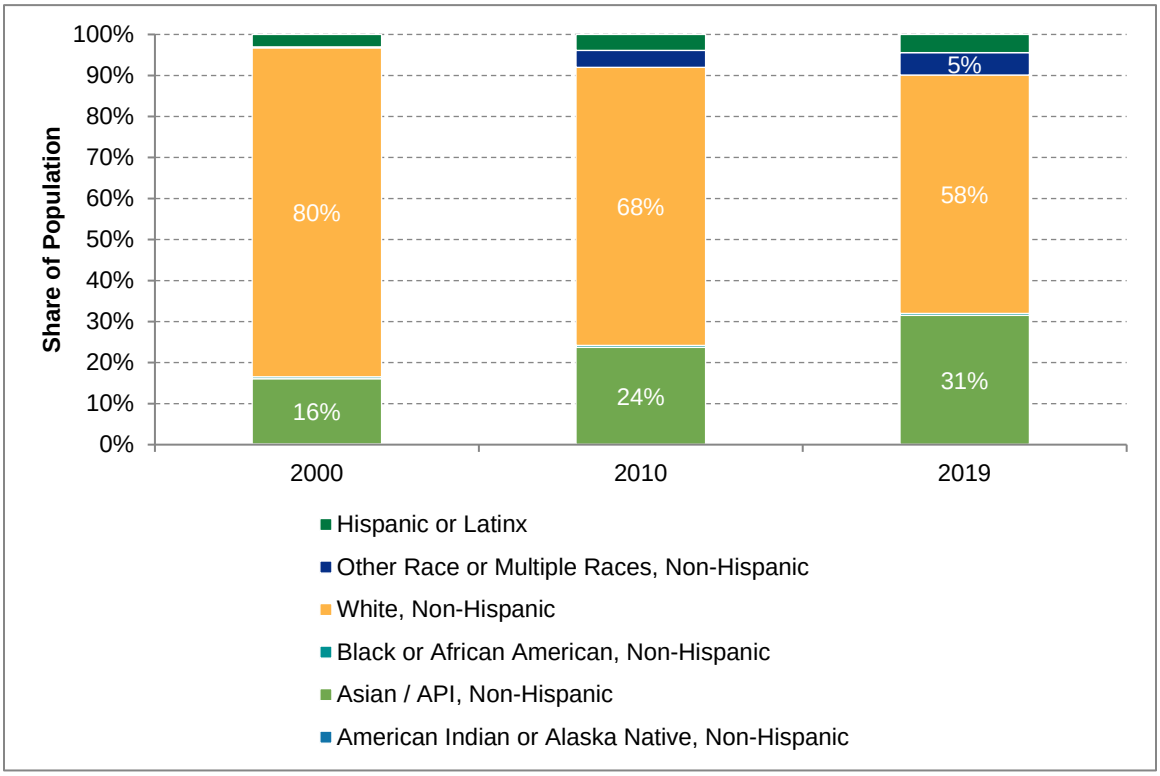
The Census Bureau defines Hispanic/Latinx ethnicity separate from racial categories. For the purposes of this graph, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, Census 2000, Table P004; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B03002)

Since 2000, the number of residents in Los Altos identifying as Non-Hispanic White has decreased by 18.1 percent. By the same token, the population of Non-White residents more than doubled, growing at a rate of 139.1 percent between 2000 and 2019. As of 2019, White, Non-Hispanic residents represent a majority of the Los Altos' total population at an estimated 58.1 percent of residents. The Asian/API, Non-Hispanic population increased the most (123.1 percent) while the White, Non-Hispanic population decreased the most.

According to the 2020 ACS 5-Year Estimate, 56.0 percent of Los Altos' population identified as Non-Hispanic White, 32.4 percent identified as Asian, 5.4 percent was an Other Race or Multiple Races, 5.5 percent was Hispanic or Latinx, and 0.7 percent was African American.

Figure A-5: Population by Race and Ethnicity, 2000-2019



Notes:

Data for 2019 represents 2015-2019 ACS estimates.

The Census Bureau defines Hispanic/Latinx ethnicity separate from racial categories. For the purposes of this graph, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, Census 2000, Table P004; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B03002)

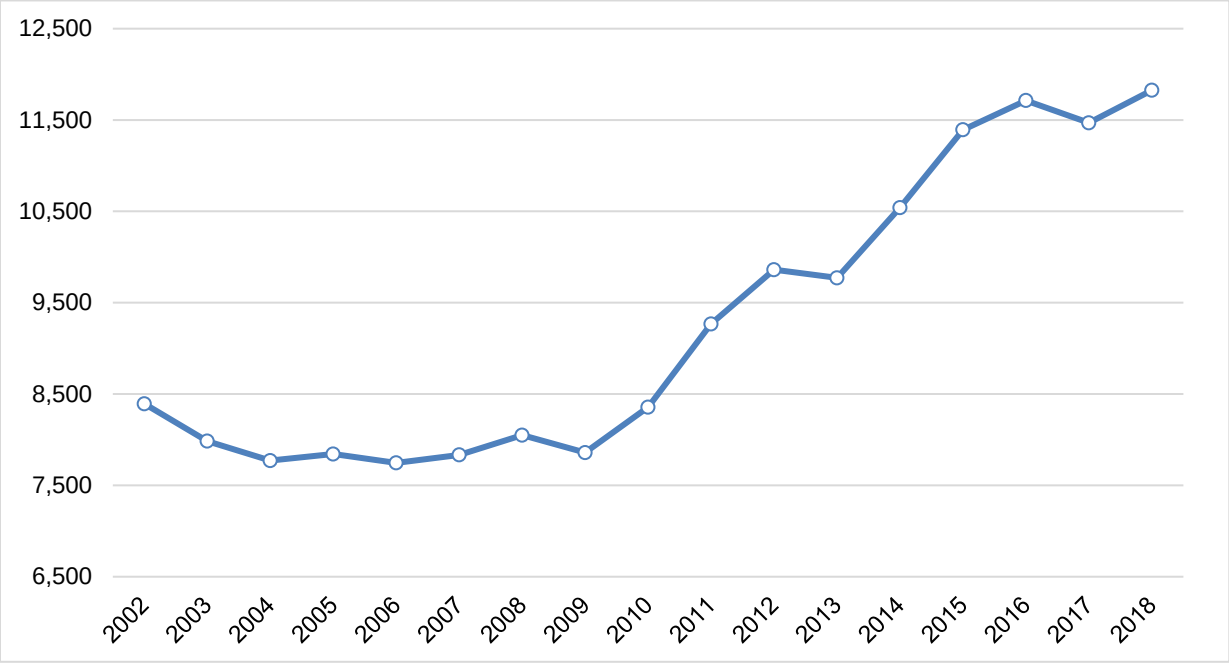
A.2.4 Employment

A city houses employed residents who either work in the community where they live or work elsewhere in the region. Conversely, a city may have job sites that employ residents from the same city, but more often employ workers commuting from outside of it. Smaller cities typically will have more employed residents than jobs there and export workers, while larger cities tend to have a surplus of jobs and import workers. To some extent the regional transportation system is set up for this flow of workers to the region's core job centers. At the same time, as the housing affordability crisis has illustrated, local imbalances may be severe, where local jobs and worker populations are out of sync at a sub-regional scale.

One measure of this is the relationship between workers and jobs. A city with a surplus of workers (meaning more workers than jobs available) "exports" workers to other parts of the region, while a city with a surplus of jobs (meaning more jobs than can be filled with local workers) must conversely "import" them. There are 13,370 employed residents and 14,257 jobs in Los Altos[2] – the ratio of jobs to workers is 1.07; therefore, Los Altos can be considered a net importer of workers. In 2019, approximately six percent of people employed in Los Altos also lived in the city (LEHD on the Map, 2019).

Between 2002 and 2018, the number of jobs in Los Altos increased by 40.9 percent (see Figure A-6).

Figure A-6: Jobs in Los Altos



Notes:

Universe: Jobs from unemployment insurance-covered employment (private, state and local government) plus United States Office of Personnel Management-sourced Federal employment

The data is tabulated by place of work, regardless of where a worker lives. The source data is provided at the census block level. These are crosswalked to jurisdictions and summarized.

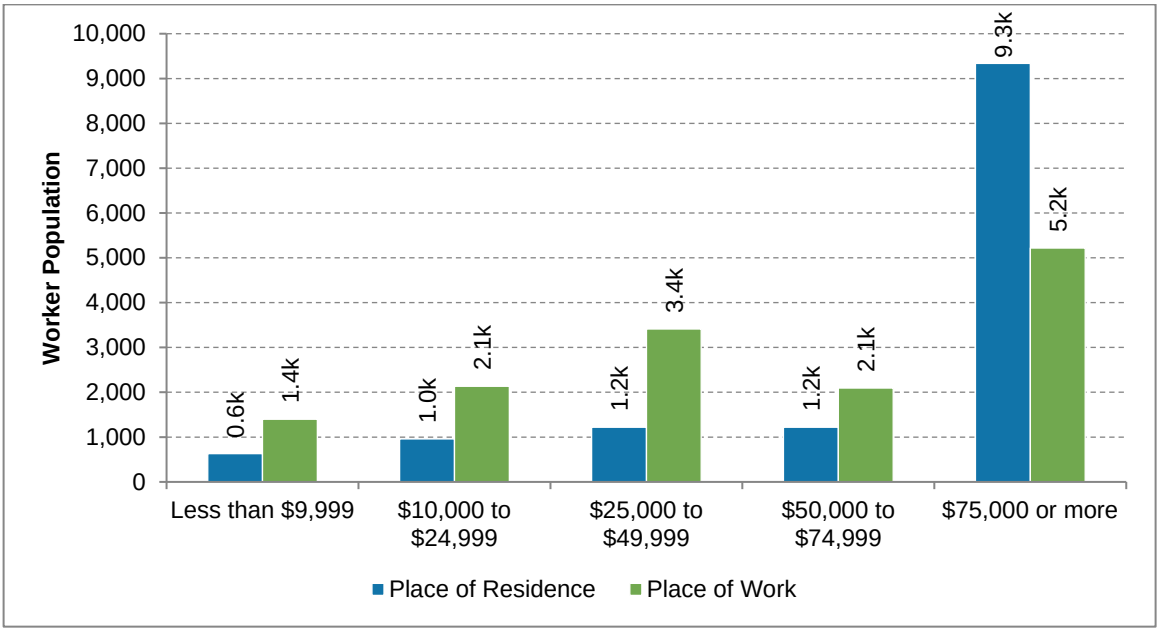
Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files, 2002-2018)

[2] Employed residents in a jurisdiction is counted by place of residence (they may work elsewhere) while jobs in a jurisdiction are counted by place of work (they may live elsewhere). The jobs may differ from those reported in Figure A-6 as the source for the time series is from administrative data, while the cross-sectional data is from a survey.

Figure A-7 shows the balance when comparing jobs to workers, broken down by different wage groups, offering additional insight into local dynamics. A community may offer employment for relatively low-income workers but have relatively few housing options for those workers - or conversely, it may house residents who are low wage workers but offer few employment opportunities for them. Such relationships may cast extra light on potentially unmet demand for housing in particular price categories. A relative surplus of jobs in relation to residents in a given wage category suggests the need to import those workers, while conversely, surpluses of workers in a wage group relative to jobs means the community will export those workers to other jurisdictions. Such flows are not inherently negative, though over time, sub-regional imbalances may appear.

Los Altos has more low-wage jobs than low-wage residents. At the other end of the wage spectrum, the city has more high-wage residents than high-wage jobs (where high-wage refers to jobs paying $75,000 or more) (see Figure A-7).[3] Therefore, Los Altos has fewer housing accommodations for its low-wage jobs and more options for its high-wage positions.

Figure A-7: Workers by Earnings, by Jurisdiction as Place of Work and Place of Residence



Notes:

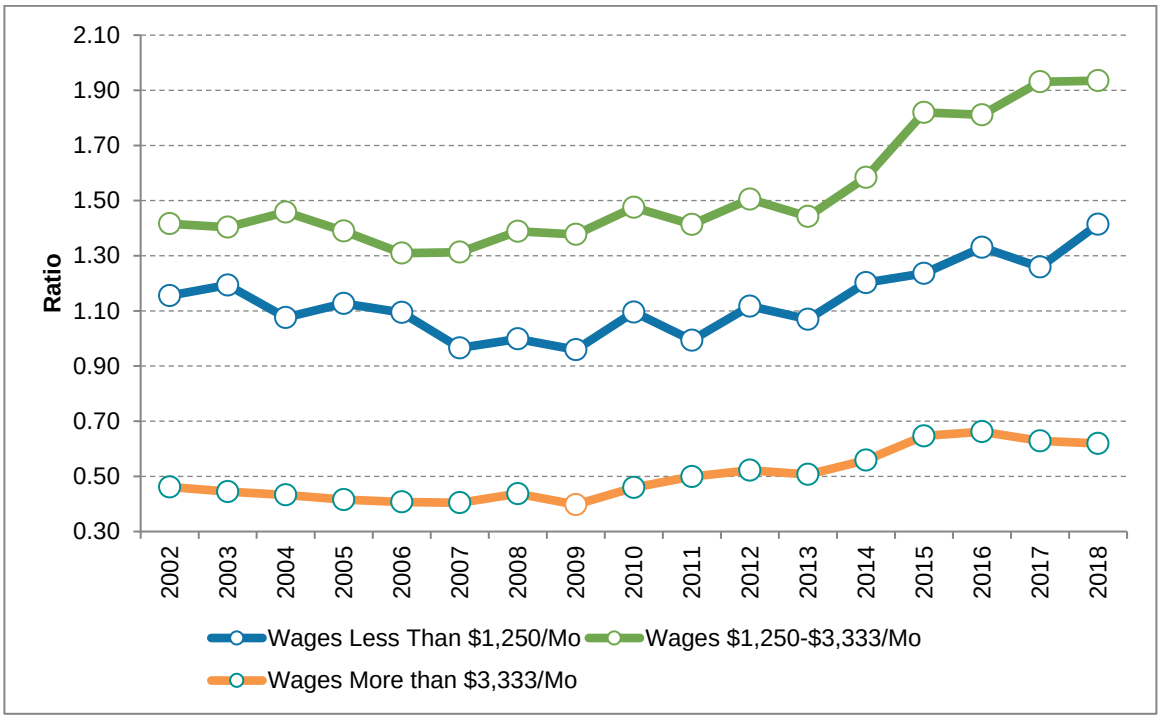
Universe: workers 16 years and over with earnings

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data 2015-2019, B08119, B08519)

[3] The source table is top-coded at $75,000, precluding more fine grained analysis at the higher end of the wage spectrum.

Figure A-8 shows the balance of a jurisdiction's resident workers to the jobs located there for different wage groups as a ratio instead - a value of 1.0 means that a city has the same number of jobs in a wage group as it has resident workers - in principle, a balance. Values above one indicates a jurisdiction will need to import workers for jobs in a given wage group. Los Altos has the greatest need to import workers for lower-wage jobs. At the regional scale, this ratio is 1.04 jobs for each worker, implying a modest import of workers from outside the region (see Figure A-8).

Figure A-8: Jobs-Worker Ratios, by Wage Group



Notes:

Universe: Jobs in a jurisdiction from unemployment insurance-covered employment (private, state and local government) plus United States Office of Personnel Management-sourced Federal employment

The ratio compares job counts by wage group from two tabulations of LEHD data: Counts by place of work relative to counts by place of residence. See text for details.

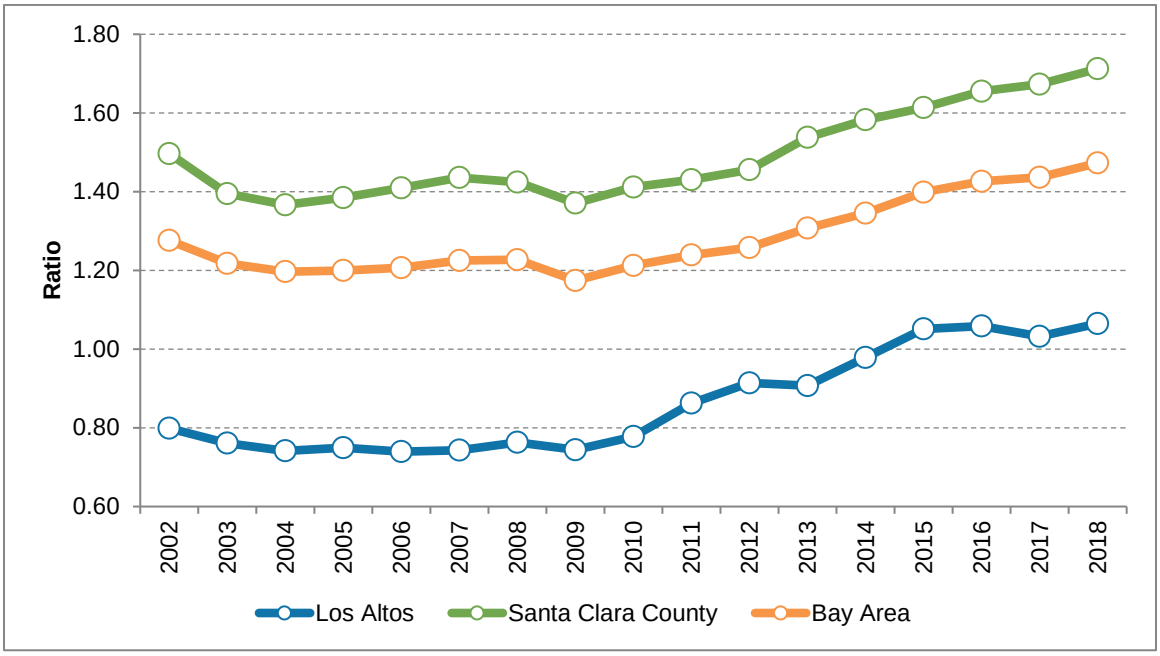
Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files (Jobs); Residence Area Characteristics (RAC) files (Employed Residents), 2010-2018)

Such balances between jobs and workers may directly influence the housing demand in a community. New jobs may draw new residents, and when there is high demand for housing relative to supply, many workers may be unable to afford to live where they work, particularly where job growth has been in relatively lower wage jobs. This dynamic not only means many

workers will need to prepare for long commutes and time spent on the road, but in the aggregate, it contributes to traffic congestion and time lost for all road users.

If there are more jobs than employed residents, it means a city is relatively jobs-rich, typically also with a high jobs to household ratio (over 1.0). The jobs-household ratio in Los Altos has increased over time -- from 0.8 in 2002, to 1.06 jobs per household in 2018 (see Figure A-9). Los Altos' ratio is lower than both Santa Clara County (1.71) and the region (1.47), suggesting the city has a lower ratio of jobs to housing units relative to the rest of the Bay Area. While the county and region are jobs rich, Los Altos houses only a slightly higher number of workers than it has jobs.

Figure A-9: Jobs-Household Ratio



Notes:

Universe: Jobs in a jurisdiction from unemployment insurance-covered employment (private, state and local government) plus United States Office of Personnel Management-sourced Federal employment; households in a jurisdiction

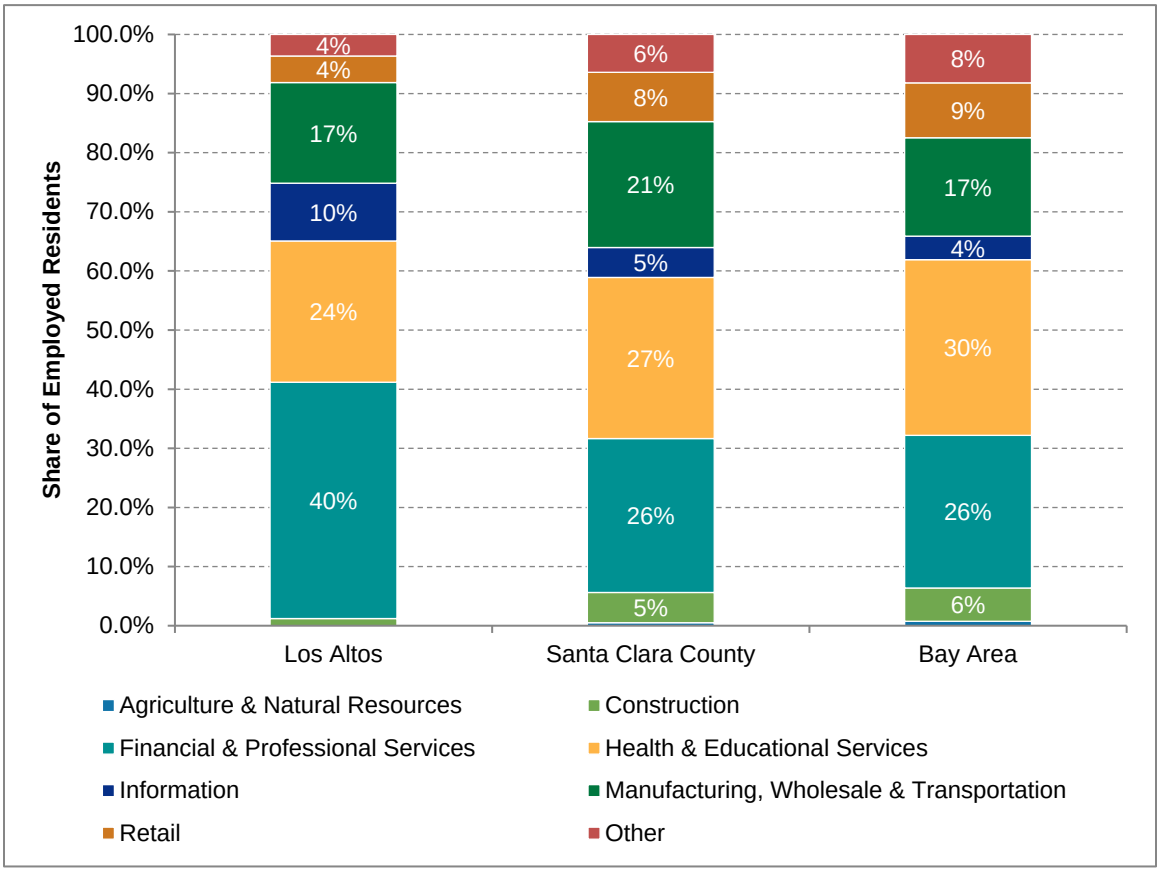
The data is tabulated by place of work, regardless of where a worker lives. The source data is provided at the census block level. These are crosswalked to jurisdictions and summarized. The ratio compares place of work wage and salary jobs with households, or occupied housing units. A similar measure is the ratio of jobs to housing units. However, this jobs-household ratio serves to compare the number of jobs in a jurisdiction to the number of housing units that are actually occupied. The difference between a jurisdiction's jobs-housing ratio and jobs-household ratio will be most pronounced in jurisdictions with high vacancy rates, a high rate of units used for seasonal use, or a high rate of units used as short-term rentals.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files (Jobs), 2002-2018; California Department of Finance, E-5 (Households))

In terms of sectoral composition, the largest industry in which Los Altos residents work is Financial & Professional Services, and the largest sector in which Santa Clara County residents work is Health & Educational Services (see Figure A-9). For the Bay Area as a whole, the Health & Educational Services industry employs the most workers. Financial & Professional Services

includes occupations within fields such as computer and information systems, scientific research and development, software development, database administration, information security, data science, and others.[4]

Figure A-10: Resident Employment by Industry



Notes:

Universe: Civilian employed population age 16 years and over

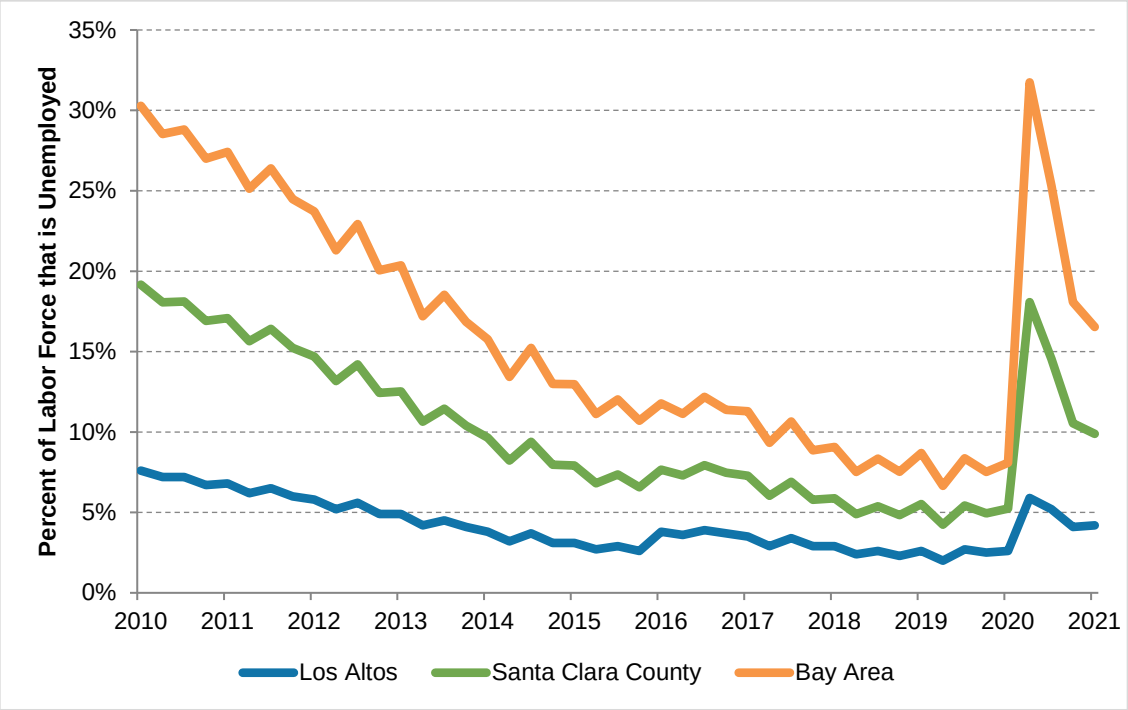
The data displayed shows the industries in which jurisdiction residents work, regardless of the location where those residents are employed (whether within the jurisdiction or not). Categories are derived from the following source tables: Agriculture & Natural Resources: C24030_003E, C24030_030E; Construction: C24030_006E, C24030_033E; Manufacturing, Wholesale & Transportation: C24030_007E, C24030_034E, C24030_008E, C24030_035E, C24030_010E, C24030_037E; Retail: C24030_009E, C24030_036E; Information: C24030_013E, C24030_040E; Financial & Professional Services: C24030_014E, C24030_041E, C24030_017E, C24030_044E; Health & Educational Services: C24030_021E, C24030_024E, C24030_048E, C24030_051E; Other: C24030_027E, C24030_054E, C24030_028E, C24030_055E

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table C24030)

[4] https://www.bls.gov/oes/current/naics2_52.htm#00-0000

In Los Altos, the unemployment rate decreased between 2010 and 2021, from an average 7.2 percent in 2010 to 4.2 percent in January of 2021. Jurisdictions throughout the region experienced a sharp rise in unemployment in 2020 due to impacts related to the COVID-19 pandemic, though with a general improvement and recovery in the later months of 2020.

Figure A-11: Unemployment Rate



Notes:

Universe: Civilian employed population age 16 years and over

Unemployment rates for the jurisdiction level is derived from larger-geography estimates. This method assumes that the rates of change in employment and unemployment are exactly the same in each sub-county area as at the county level. If this assumption is not true for a specific sub-county area, then the estimates for that area may not be representative of the current economic conditions. Since this assumption is untested, caution should be employed when using these data. Only not seasonally- adjusted labor force (unemployment rates) data are developed for cities and CDPs.

Source: ABAG 2021 Pre-certified Housing Needs Data (California Employment Development Department, Local Area Unemployment Statistics (LAUS), Sub-county areas monthly updates, 2010-2021)

Section A.3 Household Characteristics

A.3.1 Household Size

In Los Altos, the largest share of households (35.5 percent) consists of a household with two people, while the lowest share of households (10.4 percent) consists of five-or-more persons (renters and owners combined). Three-person households make up 17 percent of the occupied housing stock in Los Altos, and four-person households make up 20.7 percent (see Table A-2). According to the California Department of Finance, Los Altos had an average household size of 2.75 in 2020. Average household size in Santa Clara County was larger at 2.98 persons per household. Almost 38 percent of households in Los Altos are three to four-person households, slightly higher than the county (36.6 percent three to four-person households) and the region (32.6 percent three to four-person households).

Table A-2: Household Size

Household Size	Owner Occupied	% Owner Occupied	Renter Occupied	% Renter Occupied	% of All Occupied Units
1-person household	1,173	14%	572	28%	16%
2-person household	3,182	37%	604	30%	36%
3-person household	1,540	18%	267	13%	17%
4-person household	1,796	21%	406	20%	21%
5-or-more person household	938	11%	174	9%	10%
Total occupied housing units	**8,629**	**100%**	**2,023**	**100%**	**100%**

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25009)

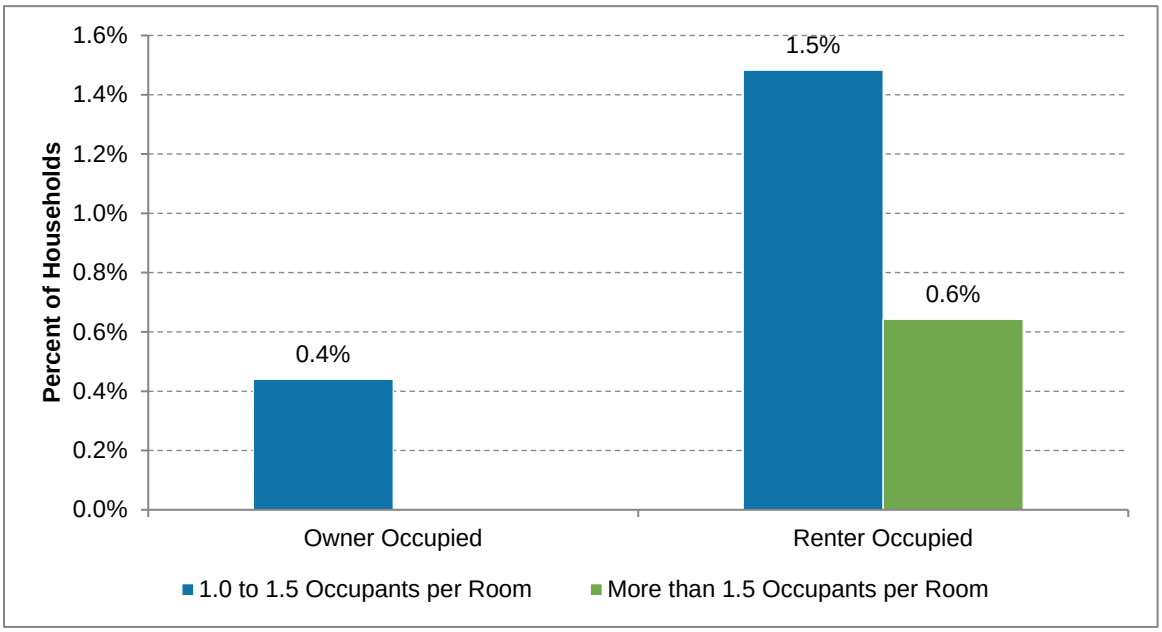
A.3.2 Overcrowding

Overcrowding occurs when the number of people living in a household is greater than the home was designed to hold. There are several different standards for defining overcrowding, but this report uses the Census Bureau definition, which is more than one occupant per room (not including bathrooms or kitchens). Additionally, the Census Bureau considers units with more than 1.5 occupants per room to be severely overcrowded.

Overcrowding is often related to the cost of housing and can occur when demand in a city or region is high. In many cities, overcrowding is seen more amongst those that are renting, with multiple households sharing a unit to make it possible to stay in their communities. Overall, 2.1

percent of renter households experience either overcrowding or severe overcrowding, while only 0.4 percent of owner households do. In Los Altos, 0.6 percent of households that rent are severely overcrowded (more than 1.5 occupants per room) (12 households), compared to 0.0 percent of households that own (see Figure A-12). Furthermore, 1.5 percent of renter households experience moderate overcrowding (1 to 1.5 occupants per room) (30 households), compared to 0.4 percent for those own (35 households).

Figure A-12: Overcrowding by Tenure and Severity



Notes:

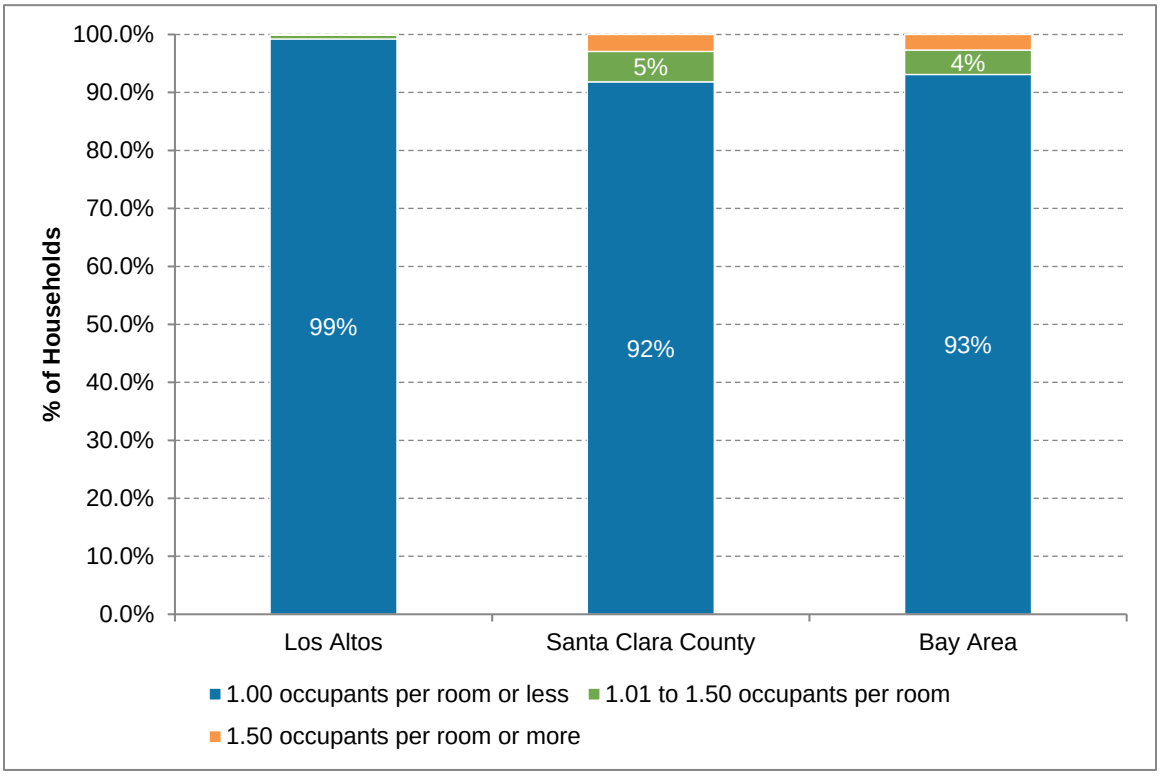
Universe: Occupied housing units

The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens), and units with more than 1.5 persons per room are considered severely overcrowded.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release)

Overall, Los Altos has a lower rate of overcrowding than the rest of the region. 0.8 percent of Los Altos residents face overcrowded conditions compared to 8.2 percent in Santa Clara County and 6.9 percent in the Bay Area. Specifically, Los Altos has 68 households experiencing overcrowded conditions and 13 households experiencing severe overcrowding.

Figure A-13: Overcrowding Severity



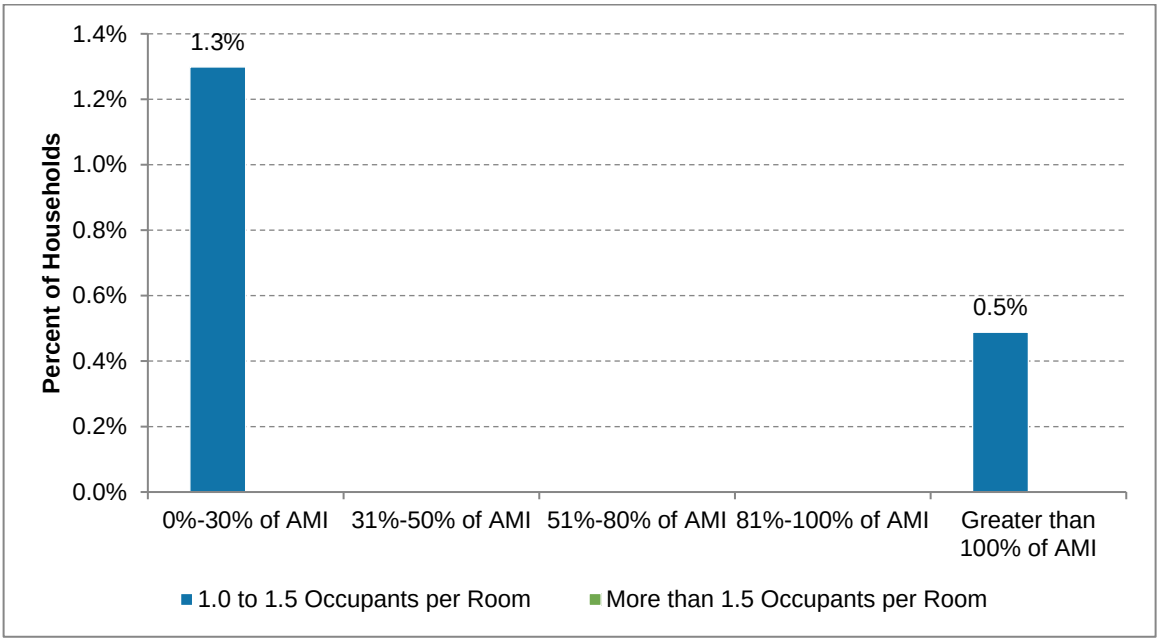
Notes:

The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens), and units with more than 1.5 persons per room are considered severely overcrowded.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release)

Overcrowding often disproportionately impacts low-income households. In Los Altos, 1.3 percent of extremely low-income households (0-30 percent of AMI) experience overcrowding (10 households) (see Figure A-14).

Figure A-14: Overcrowding by Income Level and Severity



Notes:

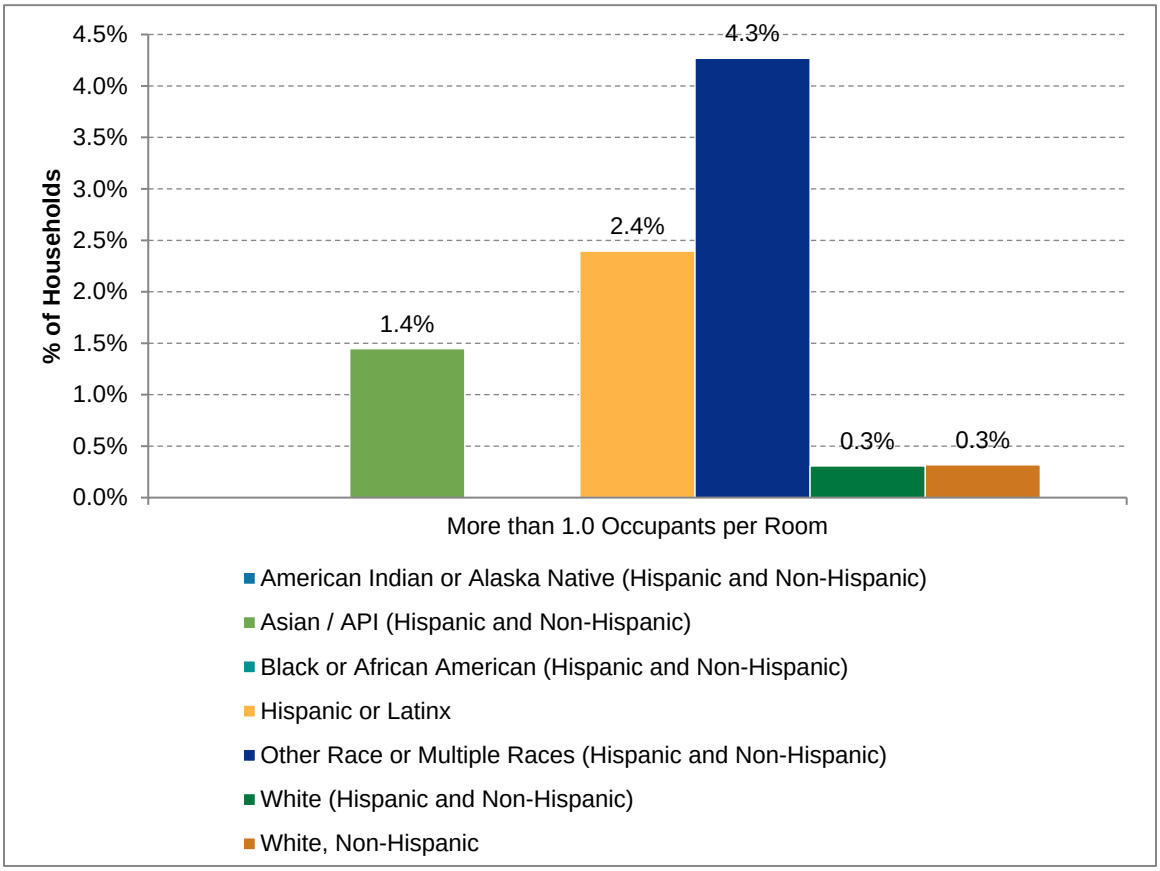
Universe: Occupied housing units

The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens), and units with more than 1.5 persons per room are considered severely overcrowded. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Santa Clara and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release)

Communities of color are more likely to experience overcrowding and more likely to experience poverty, financial instability, and housing insecurity. People of color tend to experience overcrowding at higher rates than White residents. In Los Altos, the racial group with the largest overcrowding rate is Other Race or Multiple Races (Hispanic and Non-Hispanic) at 4.3 percent (14 households) (see Figure A-15). Asian/API (Hispanic and Non-Hispanic) reported overcrowding at 1.4% (44 households), while Hispanic or Latinx reported 2.4% (8 households). Minimal rates of overcrowding (0.3 percent) were reported for White residents (42 households).

Figure A-15: Overcrowding by Race



Notes:

Universe: Occupied housing units

The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens), and units with more than 1.5 persons per room are considered severely overcrowded. For this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity. However, data for the white racial group is also reported for white householders who are not Hispanic/Latinx. Since residents who identify as white and Hispanic/Latinx may have very different experiences within the housing market and the economy from those who identify as white and non- Hispanic/Latinx, data for multiple white sub-groups are reported here.

The racial/ethnic groups reported in this table are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the total number of occupied housing units for this jurisdiction. However, all groups labelled “Hispanic and Non-Hispanic” are mutually exclusive, and the sum of the data for these groups is equivalent to the total number of occupied housing units.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25014)

A.3.3 Household Income

Household income is a critical component of housing affordability. Income impacts the decision to rent versus own, the size of unit, and location of housing. Overall, household income in Los Altos is higher than that of Santa Clara County. Los Altos' median household income in 2019 was $235,278, which is almost 90 percent higher than the county's median income of $124,055. Similarly, the mean income in Los Altos ($326,456) is twice the mean income in Santa Clara County ($164,962).

Table A-3: Household Income, City of Los Altos

	Los Altos	Santa Clara County
Median Income	$235,278	$124,055
Mean Income	$326,456	$164,962
Source: ACS 5-year estimates (2019), S1901		

The RHNA includes specific income categories defined by their respective proportion of the county area median income (AMI). Table A-4 defines these income categories.

Table A-4: Income Categories as a percentage of AMI

	% of AMI
Acutely Low [1]	0-15%
Extremely Low	15-30%
Very Low	30-50%
Low	50-80%
Moderate	80-120%
Above Moderate	>120%
Notes: [1] New income category effective January 1,2022.	
Source: Department of Housing and Community Development, 2021	

Table A-5 shows the 2021 income limits for these income categories in Santa Clara County. The above moderate category includes all households earning above the upper limit of the moderate-income category.

Table A-5: Santa Clara County 2021 Annual Income Limits by Household Size

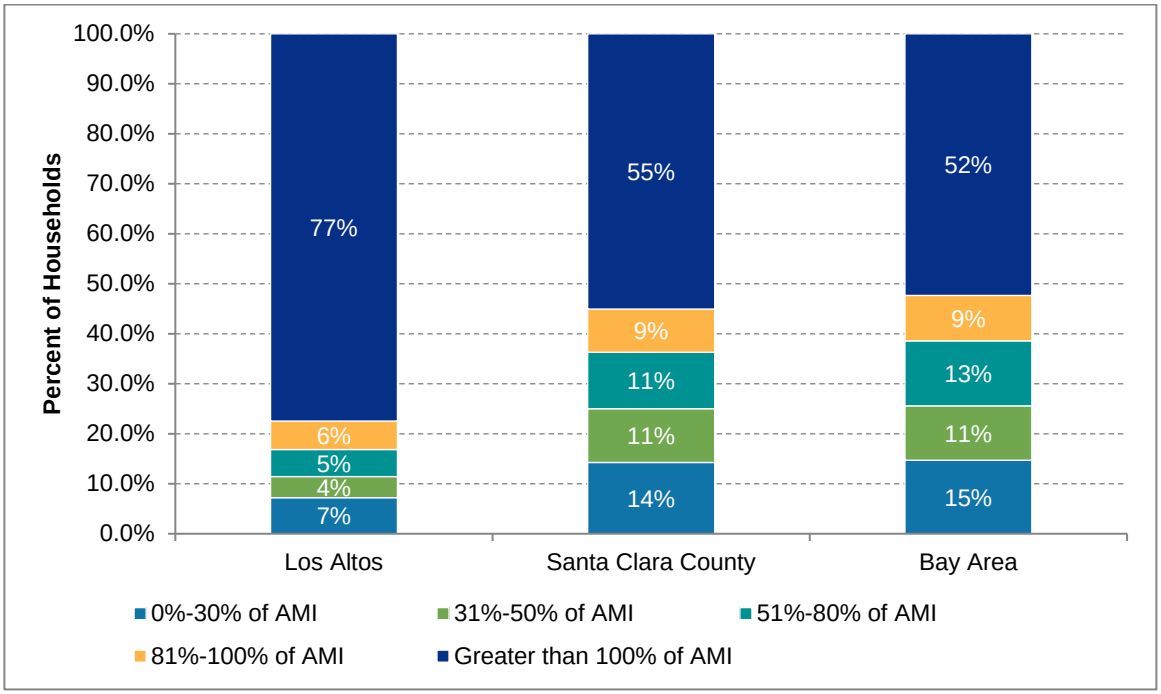
Number of Persons in Household:		1	2	3	4	5	6	7	8
Santa Clara County Area Median Income: $151,300	Acutely Low	15,900	18,510	20,450	22,700	24,500	26,350	28,150	29,950
	Extremely Low	34,800	39,800	44,750	49,700	53,700	57,700	61,650	65,650
	Very Low Income	58,000	66,300	74,600	82,850	89,500	96,150	102,750	109,400
	Low Income	82,450	94,200	106,000	117,750	127,200	136,600	146,050	155,450
	Median Income	105,900	121,050	136,150	**151,300**	163,400	175,500	187,600	199,700
	Moderate Income	127,100	145,250	163,400	181,550	196,050	210,600	225,100	239,650

Source: Department of Housing and Community Development, 2021

Despite the economic and job growth experienced throughout the region since 1990, the income gap has continued to widen. California is one of the most economically unequal states in the nation, and the Bay Area has the highest income inequality between high- and low-income households in the state.

Los Altos has a higher concentration of high-income households than in the county or region. In Los Altos, 77.5 percent of households make more than 100 percent of AMI, compared to 7.2 percent (764 households) making less than 30 percent of AMI, which is considered extremely low-income (see Figure A-16). Regionally, more than half of all households make more than 100 percent of AMI, while 15 percent make less than 30 percent of AMI. Of Los Altos' total households, 5.4 percent are low income (earning between 50 and 80 percent of AMI), while around 11.3 of households in the county and 13.0 percent of households in the Bay Area are low income. In total, 1,783 households in Los Altos earn less than 80 percent of AMI (16.9 percent of households). Many households with multiple wage earners – including food service workers, full-time students, teachers, farmworkers and healthcare professionals – can fall into lower AMI categories due to relatively stagnant wages in many industries.

Figure A-16: Households by Household Income Level



Notes:

Universe: Occupied housing units

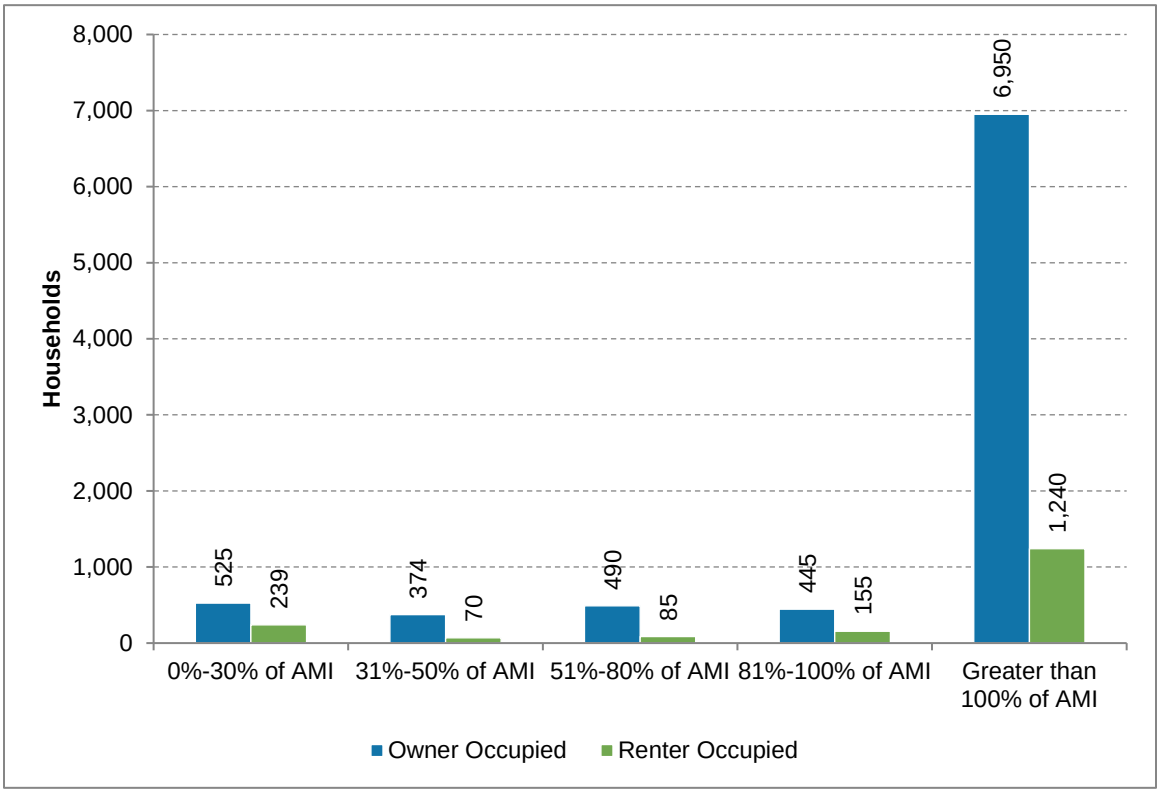
Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Santa Clara and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located. The data that is reported for the Bay Area is not based on a regional AMI but instead refers to the regional total of households in an income group relative to the AMI for the county where that household is located. Local jurisdictions are required to provide an estimate for their projected extremely low-income households (0-30percent AMI) in their Housing Elements. HCD's official Housing Element guidance notes that jurisdictions can use their RHNA for very low-income households (those making 0-50percent AMI) to calculate their projected extremely low-income households. As Bay Area jurisdictions have not yet received their final RHNA numbers, this document does not contain the required data point of projected extremely low-income households. The report portion of the housing data needs packet contains more specific guidance for how local staff can calculate an estimate for projected extremely low-income households once jurisdictions receive their 6th cycle RHNA numbers.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release)

Throughout the region, there are disparities between the incomes of homeowners and renters. Typically, the number of low-income renters greatly outpaces the amount of housing available that is affordable for these households.

In Los Altos, the largest proportion of both renters and owners falls in the Greater than 100 percent of AMI income group (see Figure A-17). There are no income groups with more renter than owners meaning Los Altos has a higher number of homeowners than renters. Renter households are most concentrated in the extremely low-income category with 31.3 percent of households earning no more than 30 percent of AMI renting their home (239 households).

Figure A-17: Household Income Level by Tenure



Notes:

Universe: Occupied housing units

Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Santa Clara and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release)

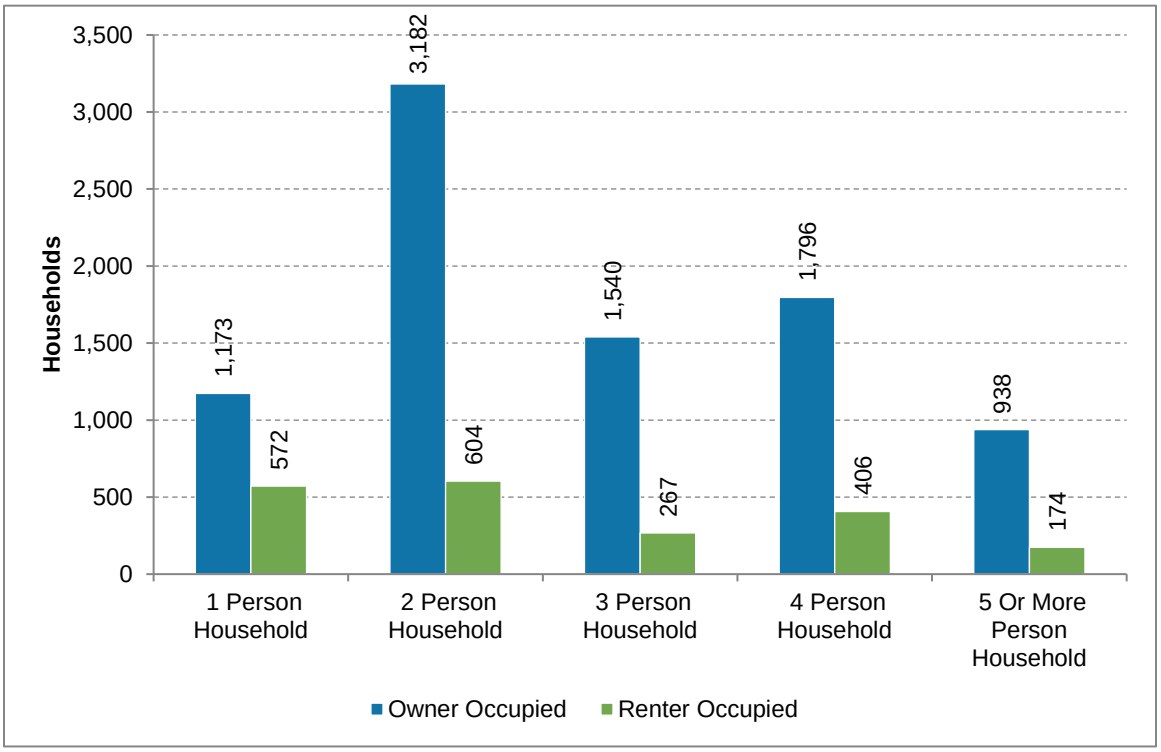
A.3.4 Special Housing Needs

Large Families

Large households (five or more persons) often have different housing needs than smaller households. If a city's housing stock does not include units with enough bedrooms, large households could end up living in overcrowded conditions and/or overpaying for housing. Of all households in Los Altos, 10.4 percent or 1,112 households, are considered large households.

A majority (84.4 percent) of large households in Los Altos live in owner occupied housing (see Figure A-18). Only 2.5 percent of large households are extremely or very low-income, earning less than 50 percent of (10 extremely low-income and 14 very low-income households).

Figure A-18: Household Size by Tenure



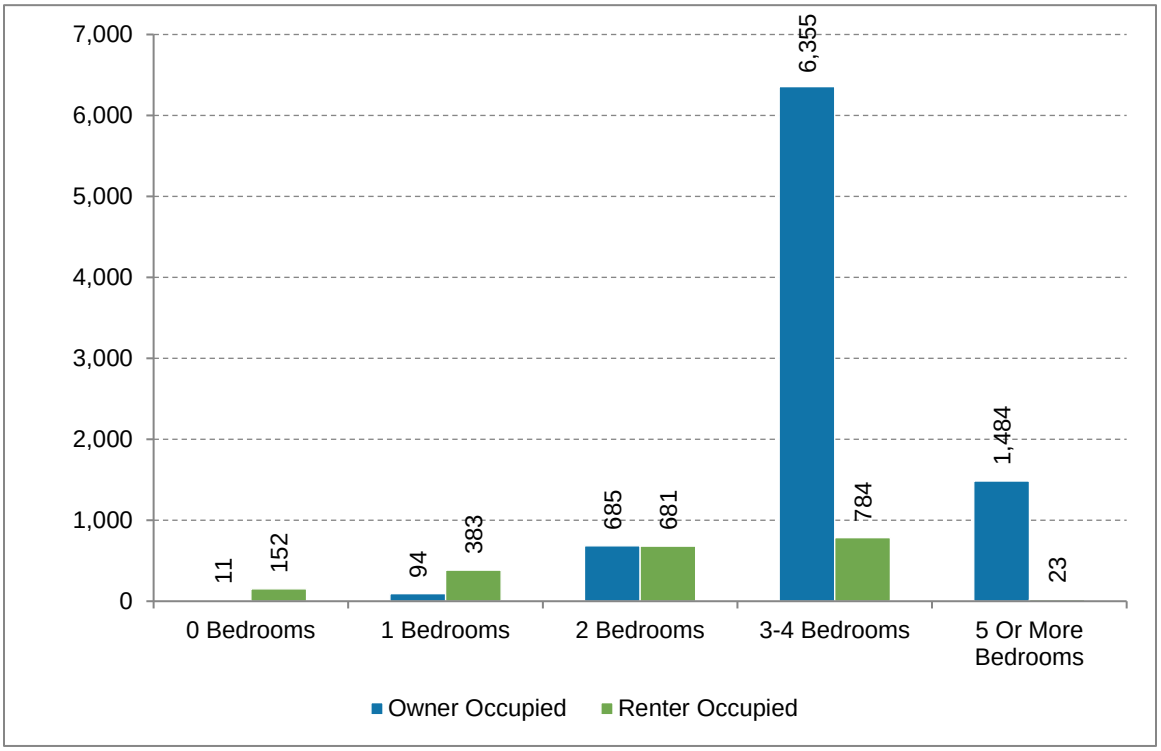
Notes:

Universe: Occupied housing units

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25009)

The unit sizes available in a community affect the household sizes that can access that community. Large families are generally served by housing units with three or more bedrooms, of which there are 8,646 units in Los Altos, or 81.2 percent of all units in Los Altos. Among these larger units with three or more bedrooms, 9.3 percent are renter-occupied, and 90.7 percent are owner-occupied (see Figure A-19). Because 10.4 percent of all households in Los Altos, or 1,112 households, are considered large households, the housing mix in Los Altos is considered adequate to accommodate larger household sizes.

Figure A-19: Housing Units by Number of Bedrooms



Notes:

Universe: Housing units

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25042)

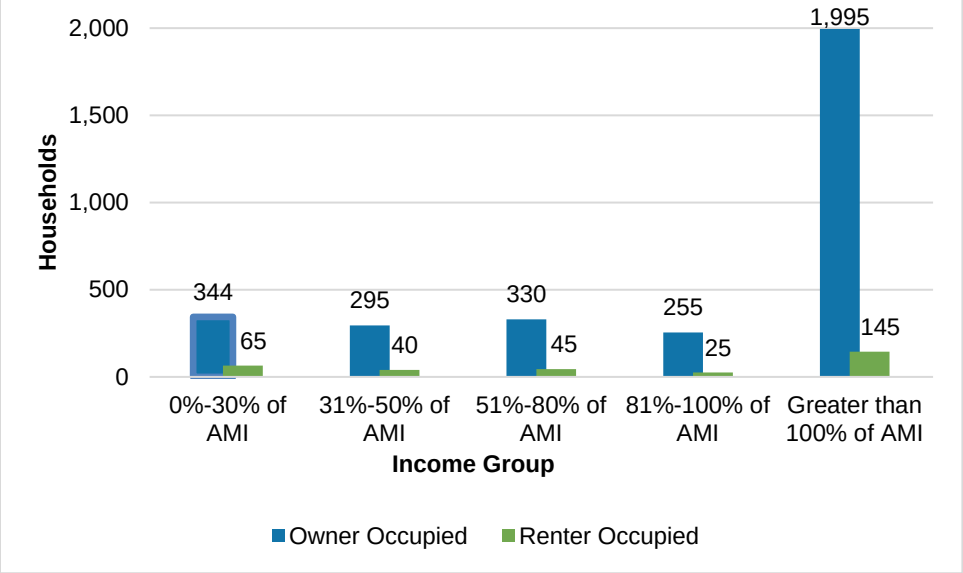
Senior Households

Senior households often experience a combination of factors that can make accessing or keeping affordable housing a challenge. They often live on fixed incomes and are more likely to have disabilities, chronic health conditions, and/or reduced mobility. There are 409 extremely low-income senior households in Los Altos (making no more than 30 percent of AMI). However, a majority of senior households, both renters and owners, earn more than 100 percent of AMI (see Figure A-20).

Seniors who rent may be at even greater risk for housing challenges than those who own, due to income differences between these groups. While most senior households own their home in Los Altos, a higher proportion own in higher income groups. 93.2 percent of senior households that earn greater than 100 percent of AMI own their home, while 84.1 percent of senior households that earn no more than 30 percent of AMI own their home. In total, 320 senior households rent their home. 20.3 percent of senior households that rent are extremely low-income (65 extremely low-income senior households that rent). Only 11 percent of senior households that own their

home is extremely low-income (344 extremely low-income senior households that own their home).

Figure A-20: Senior Households by Income and Tenure



Notes:

Universe: Senior households

For the purposes of this graph, senior households are those with a householder who is aged 62 or older. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Santa Clara and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose- Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.

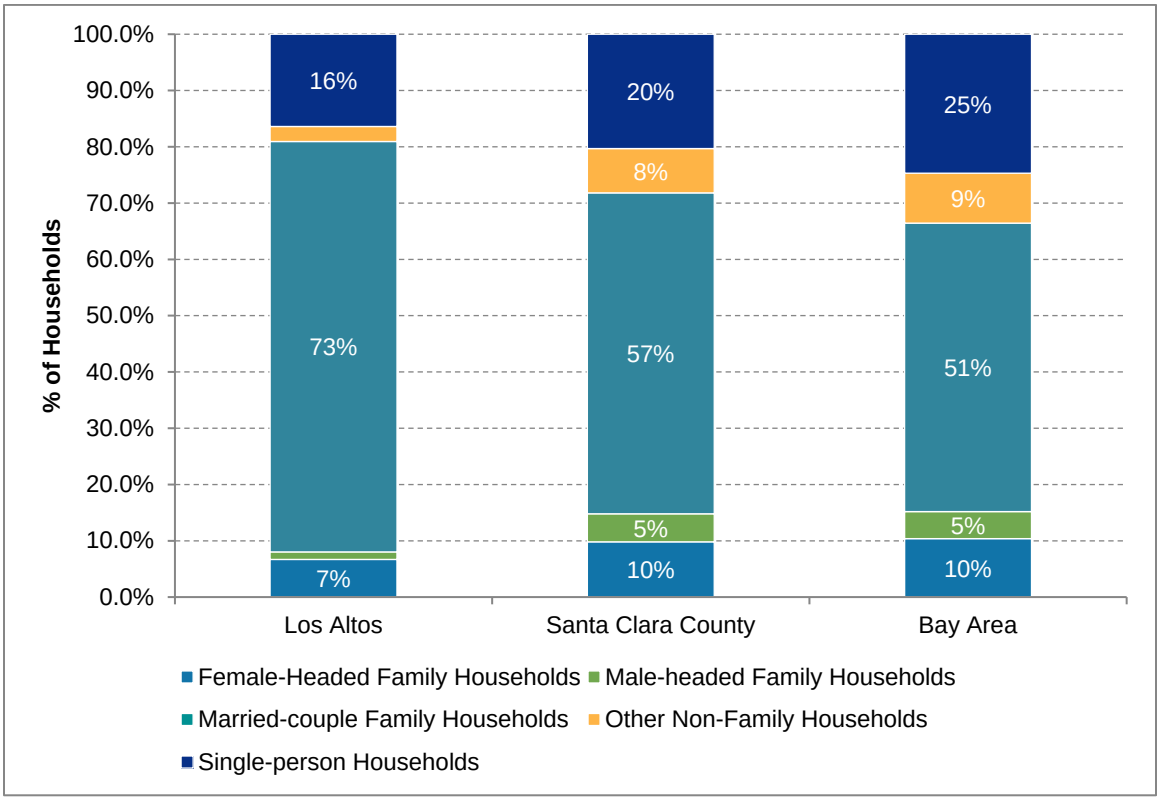
Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release)

In general, extremely low- and very low-income seniors (both renters and owners) are more likely to be cost burdened compared to higher earning seniors. In Los Altos, 36.7 percent of all senior households are housing cost burdened (see Section A.5.3, Overpayment, for a discussion of housing cost burden of seniors).

Female-headed Households

Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households, who may be supporting children or a family with only one income. In Los Altos, the largest proportion of households is Married-couple Family Households at 72.9 percent, while Female-Headed Households make up 6.7 percent of all households (711 female-headed households).

Figure A-21: Household Type



Notes:

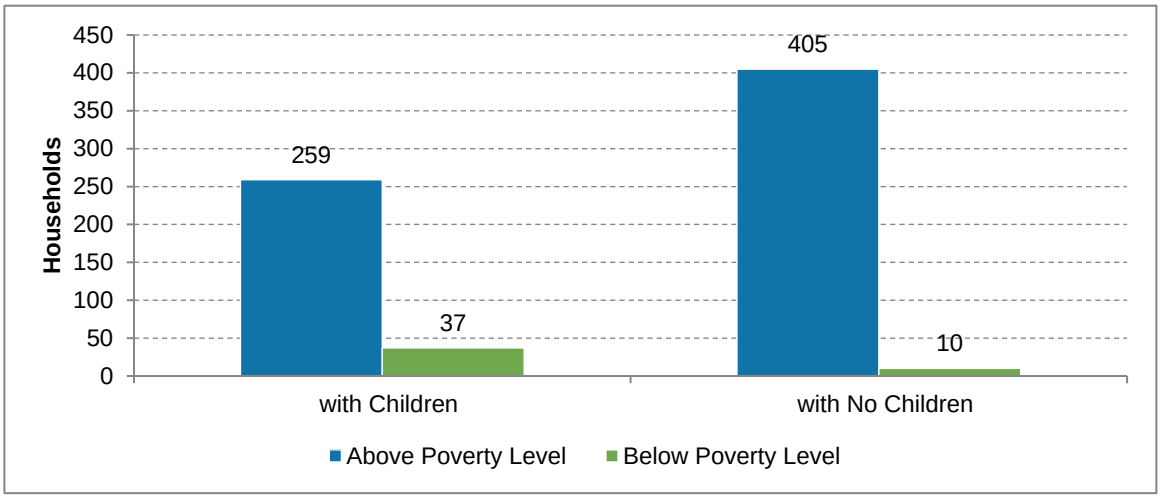
For data from the Census Bureau, a "family household" is a household where two or more people are related by birth, marriage, or adoption. "Non-family households" are households of one person living alone, as well as households where none of the people are related to each other.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B11001)

Female-headed households with children may face particular housing challenges, with pervasive gender inequality resulting in lower wages for women. Moreover, the added need for childcare can make finding a home that is affordable more challenging.

Of the 711 female-headed households in Los Altos, 41.6 percent have children. 12.5 percent of these households fall below the Federal Poverty Line (37 female-headed households with children in poverty), while only 2.4 percent of female-headed households without children live in poverty (10 households). Therefore, female-headed households with children are more likely to live in poverty than those without children.

Figure A-22: Female-Headed Households by Poverty Status



Notes:

The Census Bureau uses a federally defined poverty threshold that remains constant throughout the country and does not correspond to Area Median Income.

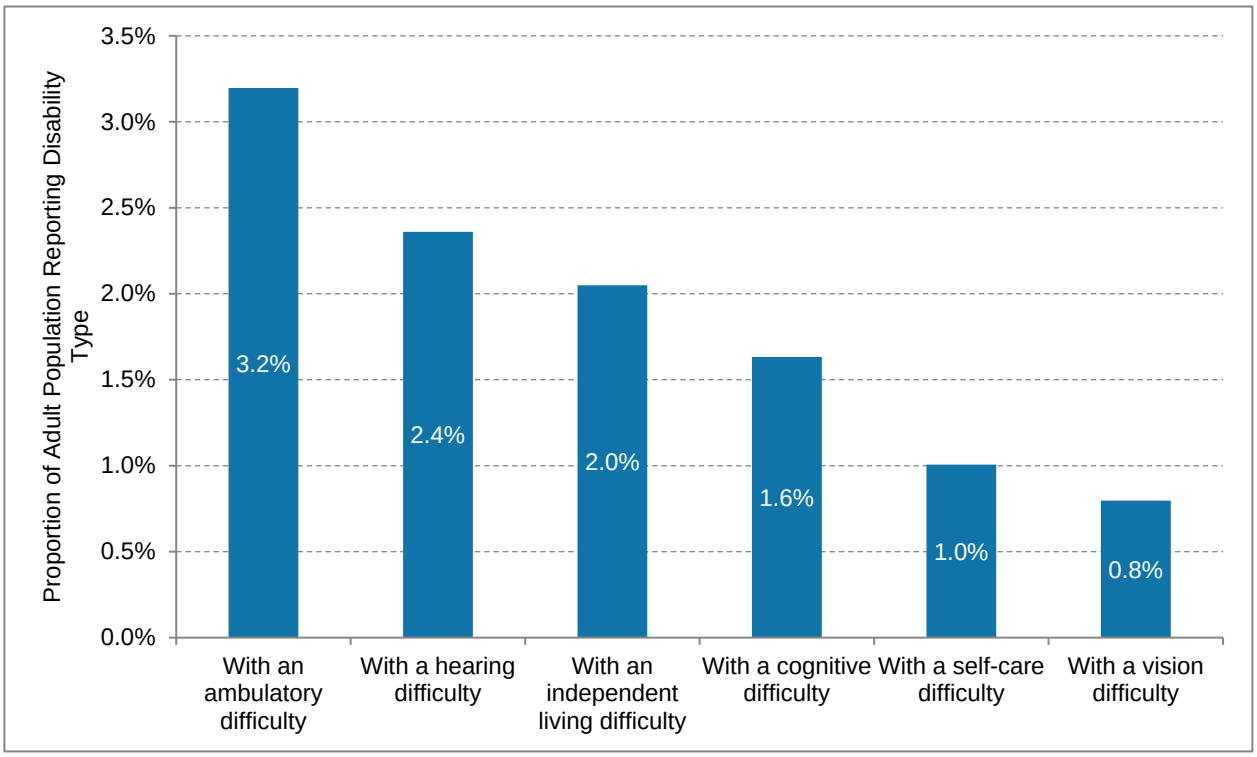
Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B17012)

Persons with Disabilities

People with disabilities face additional housing challenges. Encompassing a broad group of individuals living with a variety of physical, cognitive and sensory impairments, many people with disabilities live on fixed incomes and are in need of specialized care, yet often rely on family members for assistance due to the high cost of care.

When it comes to housing, people with disabilities are not only in need of affordable housing but accessibly designed housing, which offers greater mobility and opportunity for independence. Unfortunately, the need typically outweighs what is available, particularly in a housing market with such high demand. People with disabilities are at a high risk for housing insecurity, homelessness and institutionalization, particularly when they lose aging caregivers. Figure A-23 shows the rates at which different disabilities are present among Los Altos residents. Overall, 1,739 residents or 5.7 percent of people in Los Altos have a disability of any kind.

Figure A-23: Disability by Type



Notes:

Universe: Civilian noninstitutionalized population 18 years and over

These disabilities are counted separately and are not mutually exclusive, as an individual may report more than one disability. These counts should not be summed. The Census Bureau provides the following definitions for these disability types: Hearing difficulty: deaf or has serious difficulty hearing. Vision difficulty: blind or has serious difficulty seeing even with glasses. Cognitive difficulty: has serious difficulty concentrating, remembering, or making decisions. Ambulatory difficulty: has serious difficulty walking or climbing stairs. Self-care difficulty: has difficulty dressing or bathing. Independent living difficulty: has difficulty doing errands alone such as visiting a doctor's office or shopping.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B18102, Table B18103, Table B18104, Table B18105, Table B18106, Table B18107)

State law also requires Housing Elements to examine the housing needs of people with developmental disabilities. Developmental disabilities are defined as severe, chronic, and attributed to a mental or physical impairment that begins before a person turns 18 years old. This can include Down Syndrome, autism, epilepsy, cerebral palsy, and intellectual disability. Some people with developmental disabilities are unable to work, rely on Supplemental Security Income, and live with family members. In addition to their specific housing needs, they are at increased risk of housing insecurity after an aging parent or family member is no longer able to care for them.

In 2020, 95 people in Los Altos had a development disability. While this number has remained relatively stable, the San Andreas Regional Center identified a population of 109 people with

developmental disabilities in Los Altos in 2021.[5] Of the population with a developmental disability, children under the age of 18 make up 47.4 percent, while adults account for 52.6 percent (see Table A-6).

Table A-6: Population with Developmental Disabilities by Age (2020)

Age Group	Number of People with a Developmental Disability
Age Under 18	45
Age 18+	50
Notes: The California Department of Developmental Services is responsible for overseeing the coordination and delivery of services to more than 330,000 Californians with developmental disabilities including cerebral palsy, intellectual disability, Down syndrome, autism, epilepsy, and related conditions. The California Department of Developmental Services provides ZIP code level counts. To get jurisdiction-level estimates, ZIP code counts were crosswalked to jurisdictions using census block population counts from Census 2010 SF1 to determine the share of a ZIP code to assign to a given jurisdiction.	
Source: ABAG 2021 Pre-certified Housing Needs Data (California Department of Developmental Services, Consumer Count by California ZIP Code and Residence Type (2020))	

The most common living arrangement for individuals with developmental disabilities in Los Altos is the home of parent/family/guardian (see Table A-7).

Table A-7: Population with Developmental Disabilities by Residence (2020)

Residence Type	Number of People with a Developmental Disability
Home of Parent/Family/Guardian	93
Independent/Supported Living	4
Community Care Facility	4
Other	0
Foster/Family Home	0
Intermediate Care Facility	0
Notes: The California Department of Developmental Services is responsible for overseeing the coordination and delivery of services to more than 330,000 Californians with developmental disabilities including cerebral palsy, intellectual disability, Down syndrome, autism, epilepsy, and related conditions. The California Department of Developmental Services provides ZIP code level counts. To get jurisdiction-level estimates, ZIP code counts were crosswalked to jurisdictions using census block population counts from Census 2010 SF1 to determine the share of a ZIP code to assign to a given jurisdiction.	
Source: ABAG 2021 Pre-certified Housing Needs Data (California Department of Developmental Services, Consumer Count by California ZIP Code and Residence Type (2020))	

[5] 2015 Housing Element, Table B-20, identifies 96 people with developmental disabilities in Los Altos in 2014. 2021 data from San Andreas Regional Center provided by Kalisha Webster, Housing Choices (March 15, 2022 correspondence).

In 2021, 95 percent of Los Altos' adults with developmental disabilities lived in the home of parents or other guardians ("family home"), compared to 65 percent of the adults with developmental disabilities in all of Santa Clara County. Los Altos offers no type of licensed care facilities for adults with developmental disabilities in contrast with all of Santa Clara County where 23 percent of the adult population lives in this type of setting. Due to the lack of deeply affordable housing in Los Altos, only five percent of Los Altos adults with developmental disabilities have been able to transition into independent living with coordinated supportive services provided by the San Andreas Regional Center as compared to all of Santa Clara County where 11 percent of adults with developmental disabilities have made this transition (see Table A-8).

Table A-8: Living Arrangements of Adults with Developmental Disabilities (2021)

Adult Living Arrangement	Number of People with a Developmental Disability			
	Los Altos		Santa Clara County	
	#	%	#	%
Home of Parent/Family/Guardian (Family Home)	62	95%	4,362	65%
Own Apartment with Supportive Services	3	5%	756	11%
Licensed Facilities	0	0%	1,525	23%
Other (Including Homeless)	0	0%	94	1%
Total Adults	**65**	**100%**	**6,737**	**100%**

Source: San Andreas Regional Center (2021); California Department of Developmental Services (2021); Kalisha Webster, Housing Choices (2022)

Additional data and trends demonstrate housing needs for people with developmental disabilities in Los Altos:

- Growth in the Santa Clara County adult population with developmental disabilities correlates with the documented annual increase in the diagnosis of autism that began in the mid-1980s and did not level out until after 2015. The cumulative impact of this trend is already seen in the growth of the Santa Clara County population age 18 to 41 with developmental disabilities.
- Longer life spans will result in more adults with developmental disabilities outliving their parents and family members who currently house almost all of Los Altos adults with developmental disabilities.
- Between September 2015 and June 2021, five percent fewer people with developmental disabilities were able to be housed in licensed care facilities (including community care facilities, intermediate care facilities, and skilled nursing facilities) in Santa Clara County.
- Most Los Altos adults with developmental disabilities who want to live independently may need to move elsewhere due to the lack of deeply affordable housing in Los Altos.

- People with developmental disabilities are more likely than the general population to have an accompanying physical disability. Almost 20 percent of Santa Clara County residents with developmental disabilities have limited mobility, and 15 percent have a vison or hearing impairment. The need for an accessible unit coupled with the need for coordinated supportive services compounds the housing barriers faced by those with both cognitive and physical disabilities.[6]

Residents Living Below the Poverty Level

The Federal Poverty Level is an estimate of the minimum annual income a household would need to pay for essentials, such as food, housing, clothes, and transportation. This level considers the number of people in a household, their income, and the state in which they live. In Los Altos, 2.8 percent of the total population (856 residents) experience poverty, which is lower than the rate of Santa Clara County residents (7.5 percent).

Table A-9: Poverty Status

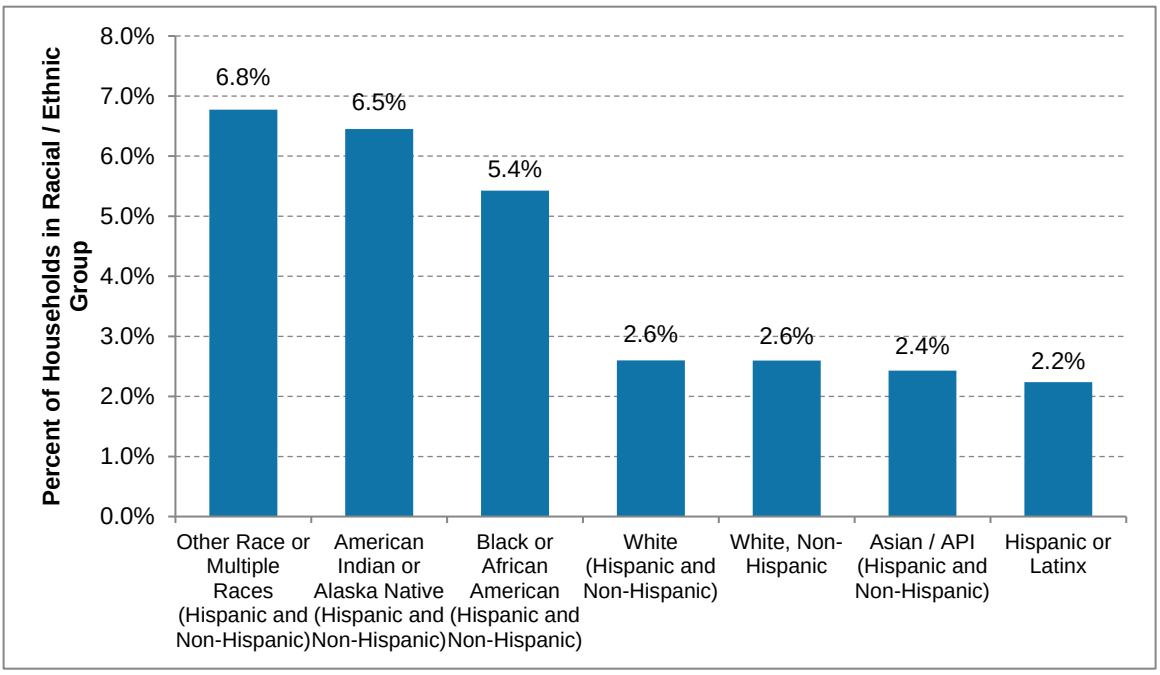
	Los Altos	Santa Clara County
% of Population Below Poverty Level	2.8%	7.5%
Source: ACS 5-year estimates (2019), S1701		

As mentioned previously, female-headed households with children experience poverty at a disproportionate rate than those without children or the overall population.

Currently, people of color are more likely to experience poverty and financial instability as a result of federal and local housing policies that have historically excluded them from the same opportunities extended to white residents. These economic disparities also leave communities of color at higher risk for housing insecurity, displacement, or homelessness. In Los Altos, Other Race or Multiple Races (Hispanic and Non-Hispanic) residents experience the highest rates of poverty (6.8 percent), followed closely by American Indian or Alaska Native (Hispanic and Non-Hispanic) residents (6.5 percent) (see Figure A-24).

[6] Kalisha Webster, Housing Choices (March 15, 2022 correspondence).

Figure A-24: Poverty Status by Race



Notes:

Universe: Population for whom poverty status is determined

The Census Bureau uses a federally defined poverty threshold that remains constant throughout the country and does not correspond to Area Median Income. For this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity. However, data for the white racial group is also reported for white householders who are not Hispanic/Latinx. Since residents who identify as white and Hispanic/Latinx may have very different experiences within the housing market and the economy from those who identify as white and non-Hispanic/Latinx, data for multiple white sub-groups are reported here. The racial/ethnic groups reported in this table are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the population for whom poverty status is determined for this jurisdiction. However, all groups labelled "Hispanic and Non-Hispanic" are mutually exclusive, and the sum of the data for these groups is equivalent to the population for whom poverty status is determined.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B17001(A-I))

Farmworkers

Across the state, housing for farmworkers has been recognized as an important and unique concern. Farmworkers generally receive wages that are considerably lower than other jobs and may have temporary housing needs. Finding decent and affordable housing can be challenging, particularly in the current housing market.

In Los Altos, there were no reported students of migrant workers from the 2016-2017 to 2019-2020 school year. The trend for the region has been a decline of 14.1 percent in the number of migrant worker students since the 2016-2017 school year. The change at the county level is a 49.7 percent decrease in the number of migrant worker students since the 2016-2017 school year (see Table A-10).

Table A-10: Migrant Worker Student Population

Academic Year	Los Altos	Santa Clara County	Bay Area
2016-17	0	978	4,630
2017-18	0	732	4,607
2018-19	0	645	4,075
2019-20	0	492	3,976

Notes:

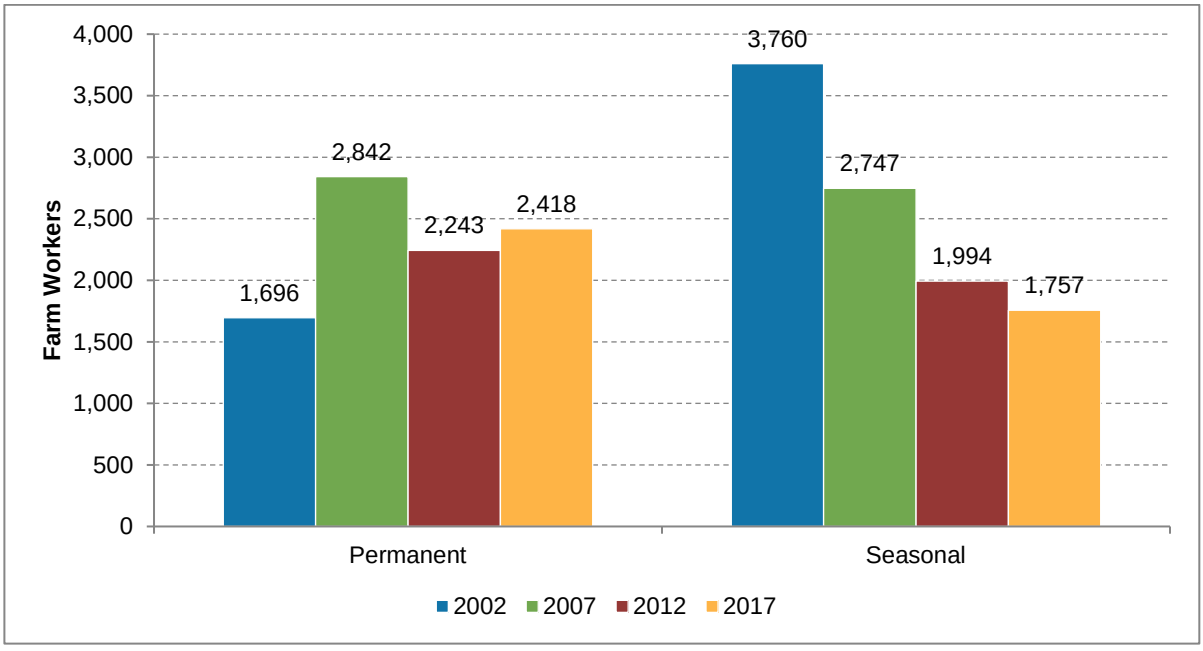
Universe: Total number of unduplicated primary and short-term enrollments within the academic year (July 1 to June 30), public schools

The data used for this table was obtained at the school site level, matched to a file containing school locations, geocoded and assigned to jurisdiction, and finally summarized by geography.

Source: ABAG 2021 Pre-certified Housing Needs Data (California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS), Cumulative Enrollment Data (Academic Years 2016-2017, 2017-2018, 2018-2019, 2019-2020))

According to the U.S. Department of Agriculture Census of Farmworkers, the number of permanent farm workers in Santa Clara County has increased since 2002, totaling 2,418 in 2017, while the number of seasonal farm workers has decreased, totaling 1,757 in 2017 (see Figure A-25).

Figure A-25: Farm Operations and Farm Labor by County, Santa Clara County



Notes:

Universe: Hired farm workers (including direct hires and agricultural service workers who are often hired through labor contractors)

Farm workers are considered seasonal if they work on a farm less than 150 days in a year, while farm workers who work on a farm more than 150 days are considered to be permanent workers for that farm.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Agriculture, Census of Farmworkers (2002, 2007, 2012, 2017), Table 7: Hired Farm Labor)

Over the past two decades, there has been a shift to a more permanent workforce for many farms, which has shifted the bulk of the housing need from seasonal housing for migrant workers to permanently affordable housing for low wage working families. While both types of housing are needed, farmworker housing is no longer solely a rural issue. Farmworker populations have declined while at the same time trends for farmworkers have resulted in longer commutes (up to 75 miles per the USDA) for this population. Local jurisdictions with an agriculture-based economy are responsible for addressing the needs of farmworkers and their families through affirmatively furthering fair housing (AFFH) analysis.

As a result, there is not an explicit need for housing for farmworkers and their families (as opposed to housing for other low wage households), as Los Altos does not have an “agriculture-based economy”. However, other housing types promoted in the Housing Element, such as housing for low-income households and multi-family housing, can also serve farmworkers.

People Experiencing Homelessness

Homelessness remains an urgent challenge in many communities across the state, reflecting a range of social, economic, and psychological factors. Rising housing costs result in increased risks of community members experiencing homelessness. Far too many residents who have found themselves housing insecure have ended up unhoused or homeless in recent years, either temporarily or longer term. Unhoused individuals and families living arrangement may vary and could include living on the streets or outdoors (e.g., in parks or encampment areas), sleeping in vehicles, staying in a homeless shelter or transitional housing, staying in a hotel or motel, or sharing housing of other people (e.g., living in doubled-up arrangements or couch-surfing). Addressing the specific housing needs for the unhoused population remains a priority throughout the region, particularly since homelessness is disproportionately experienced by people of color, people with disabilities, those struggling with addiction and those dealing with traumatic life circumstances.

The Point-in-Time (PIT) Count is an annual census and survey to identify the sheltered and unsheltered homeless population. According to the 2019 PIT Count, of the 9,706 reported homeless persons in Santa Clara County, the majority of persons experiencing homelessness are households without children in their care, and an overwhelming majority of those (7,413 or 87 percent) are unsheltered. Of those homeless persons that are under 18 years old or with children (1,197), 688 or 57.0 percent are sheltered in an emergency shelter or transitional housing (see Table A-11). The 2022 PIT showed a 10,028 homeless population in Santa Clara County,

representing a three percent increase, but with a decline in the number of individuals living outdoors (unsheltered) and an increase in sheltered individuals.[7]

Table A-11: Homelessness by Household Type and Shelter Status, Santa Clara County

Type	People in Households Composed Solely of Children Under 18	People in Households with Adults and Children	People in Households without Children Under 18	Total
Sheltered – Emergency Shelter	7	377	696	1,080
Sheltered – Transitional Housing	3	301	400	704
Unsheltered	266	243	7,413	7,922
Totals	**276**	**921**	**8,509**	**9,706**

Note: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last 10 days in January.

Each Bay Area county is its own CoC, and so the data for this table is provided at the county-level.

Per HCD's requirements, jurisdictions will need to supplement this county-level data with local estimates of people experiencing homelessness.

Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019)

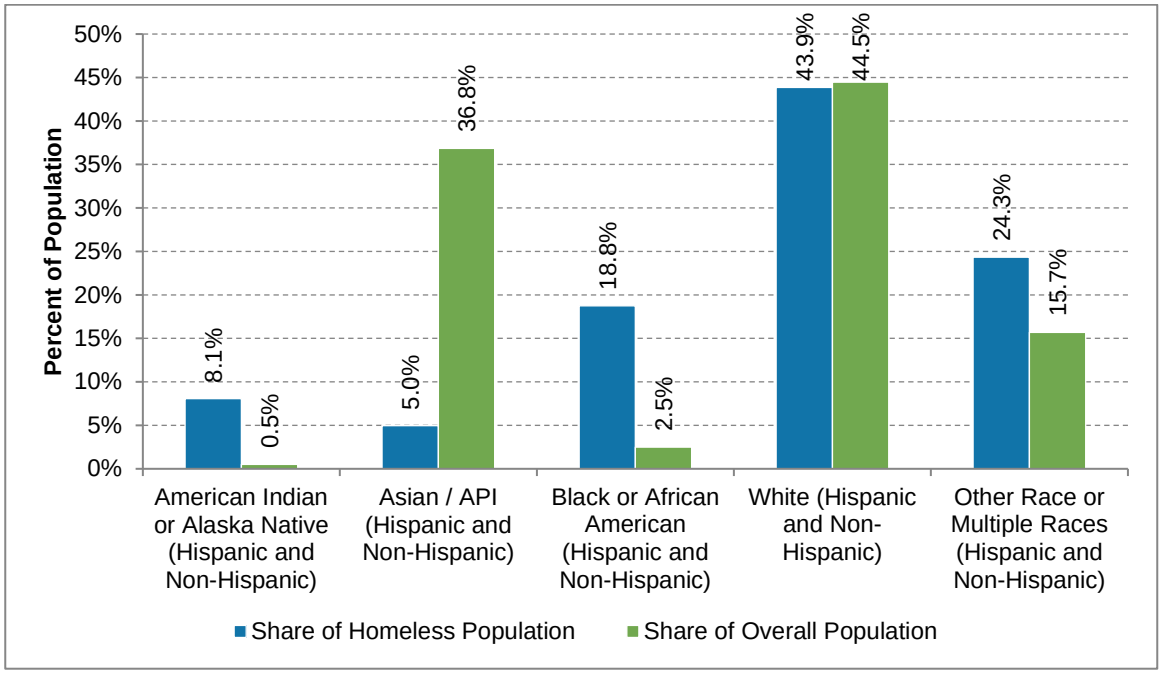
Between 2017 and 2019, Los Altos saw its homeless population increase over tenfold, from six to 76 people. This is higher than the rate of increase in the county, 31 percent, during the same period (7,394 to 9,706 people experiencing homelessness). Los Altos' homeless population is less than one percent of the county's homeless population.

As noted above, people of color are more likely to experience poverty and financial instability as a result of federal and local housing policies that have historically excluded them from the same opportunities extended to white residents. Consequently, people of color are often disproportionately impacted by homelessness, particularly Black residents of the Bay Area. In Santa Clara County, White (Hispanic and Non-Hispanic) residents represent the largest proportion of residents experiencing homelessness and account for 43.9 percent of the homeless population, while making up 44.5 percent of the overall population (see Figure A-26). Latinx residents represent 42.7 percent of the population experiencing homelessness, while Latinx residents comprise only 25.8 percent of the general population (see Figure A-27). While White residents represent the largest proportion of residents experiencing homelessness, making up just under 44 percent of the homeless population, Black or African American and American Indian

[7] https://news.sccgov.org/news-release/county-santa-clara-and-city-san-jose-release-preliminary-results-2022-point-time

or Alaska Native residents are overrepresented – accounting for 18.8 and 8.1 percent of the homeless population while only making up 2.5 and 0.5 percent of the overall population of Santa Clara County respectively.

Figure A-26: Racial Group Share of General and Homeless Populations, Santa Clara County



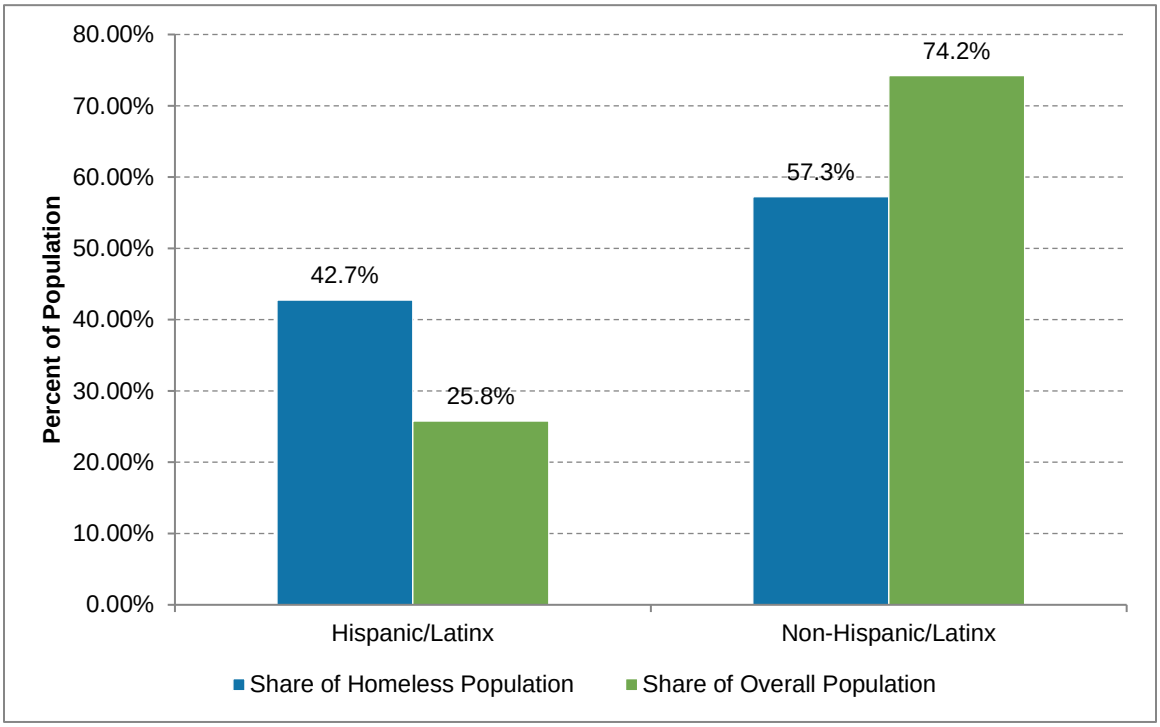
Notes:

Universe: Population experiencing homelessness

This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. Each Bay Area county is its own CoC, and so the data for this table is provided at the county-level. Per HCD's requirements, jurisdictions will need to supplement this county-level data with local estimates of people experiencing homelessness. HUD does not disaggregate racial demographic data by Hispanic/Latinx ethnicity for people experiencing homelessness. Instead, HUD reports data on Hispanic/Latinx ethnicity for people experiencing homelessness in a separate table. Accordingly, the racial group data listed here includes both Hispanic/Latinx and non-Hispanic/Latinx individuals.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-I))

Figure A-27: Latino Share of General and Homeless Populations, Santa Clara County



Notes:

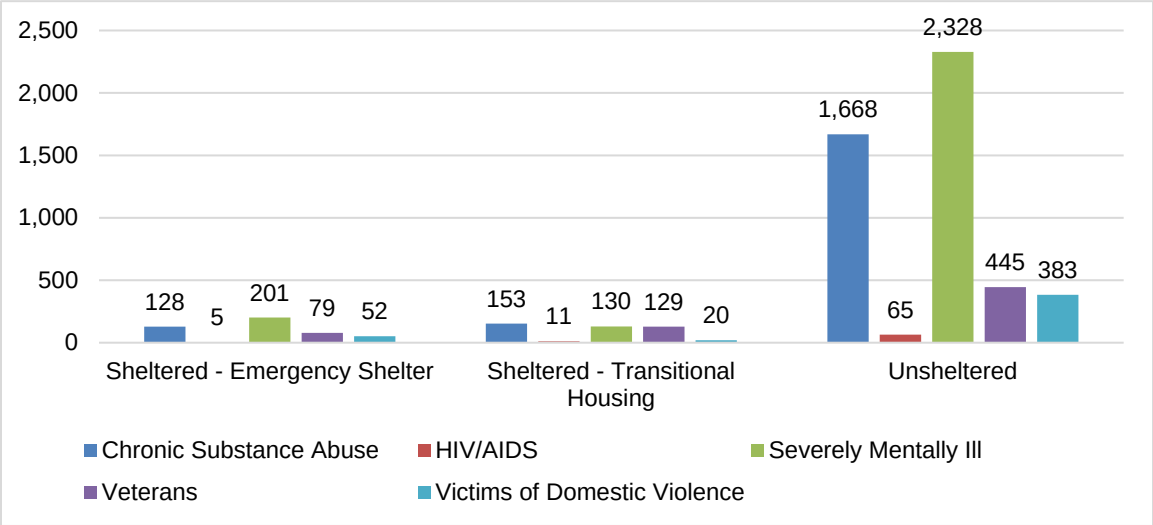
Universe: Population experiencing homelessness

This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. Each Bay Area county is its own CoC, and so the data for this table is provided at the county-level. Per HCD's requirements, jurisdictions will need to supplement this county-level data with local estimates of people experiencing homelessness. The data from HUD on Hispanic/Latinx ethnicity for individuals experiencing homelessness does not specify racial group identity. Accordingly, individuals in either ethnic group identity category (Hispanic/Latinx or non-Hispanic/Latinx) could be of any racial background.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-I))

Many of those experiencing homelessness are dealing with severe issues – including mental illness, substance abuse and domestic violence – that are potentially life threatening and require additional assistance. In Santa Clara County, homeless individuals are commonly challenged by severe mental illness, with 2,659 reporting this condition. Of those, 87.6 percent are unsheltered, further adding to the challenge of handling the issue (see Figure A-28).

Figure A-28: Characteristics for the Population Experiencing Homelessness, Santa Clara County



Notes:

Universe: Population experiencing homelessness

This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. Each Bay Area county is its own CoC, and so the data for this table is provided at the county-level. Per HCD's requirements, jurisdictions will need to supplement this county-level data with local estimates of people experiencing homelessness. These challenges/characteristics are counted separately and are not mutually exclusive, as an individual may report more than one challenge/characteristic. These counts should not be summed.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019))

In Los Altos, the student population experiencing homelessness totaled 29 during the 2019-2020 school year and decreased by 31.0 percent since the 2016-2017 school year. By comparison, Santa Clara County had a 3.5 percent increase in the population of students experiencing homelessness since the 2016-2017 school year, while the Bay Area population of students experiencing homelessness decreased by 8.5 percent. During the 2019-2020 school year, there were still 13,718 students experiencing homelessness throughout the region, adding undue burdens on learning and thriving, with the potential for longer term negative effects.

The number of students in Los Altos experiencing homelessness in 2019 represents 1.3 percent of the Santa Clara County total and 0.2 percent of the Bay Area total.

Table A-12: Students in Local Public Schools Experiencing Homelessness

Academic Year	Los Altos	Santa Clara County	Bay Area
2016-17	42	2,219	14,990
2017-18	45	2,189	15,142
2018-19	42	2,405	15,427
2019-20	29	2,297	13,718

Notes:

Universe: Total number of unduplicated primary and short-term enrollments within the academic year (July 1 to June 30), public schools

The California Department of Education considers students to be homeless if they are unsheltered, living in temporary shelters for people experiencing homelessness, living in hotels/motels, or temporarily doubled up and sharing the housing of other persons due to the loss of housing or economic hardship. The data used for this table was obtained at the school site level, matched to a file containing school locations, geocoded and assigned to jurisdiction, and finally summarized by geography.

Source: ABAG 2021 Pre-certified Housing Needs Data (California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS), Cumulative Enrollment Data (Academic Years 2016-2017, 2017-2018, 2018-2019, 2019-2020))

Emergency Shelters/Transitional Housing

At this time, there are currently no emergency shelters or shelters for domestic violence victims located in Los Altos. The Governmental Constraints section in Appendix C describes how the City permits emergency shelters.

Resources for People Experiencing Homelessness

The Santa Clara County Continuum of Care (CoC) is a broad group of stakeholders dedicated to ending and preventing homelessness in Santa Clara County. The key responsibilities of the CoC are ensuring community-wide implementation of efforts to end homelessness and programmatic and systemic effectiveness.

The Santa Clara County's supportive housing system provides services related to emergency shelters, transitional and permanent housing, rapid rehousing, supportive services, homeless prevention rental assistance, and special initiatives including employment pathways and youth programs.

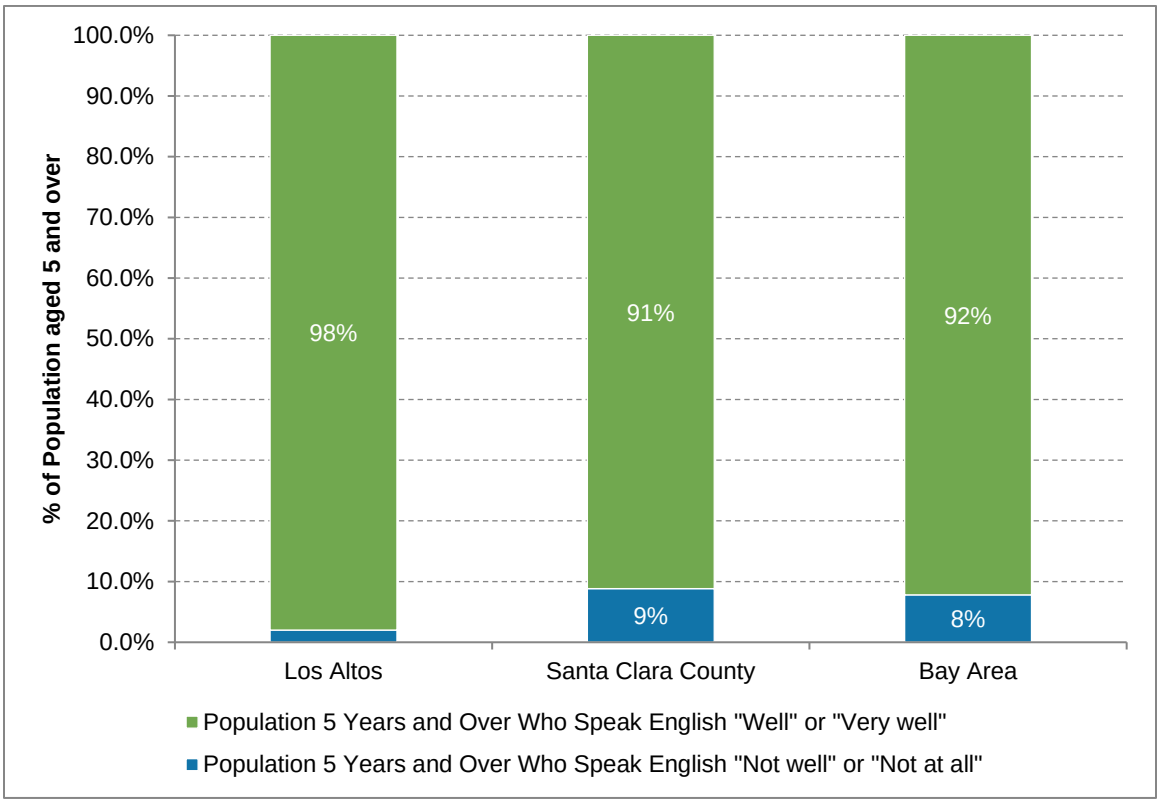
Non-English Speakers

California has long been an immigration gateway to the United States, which means that many languages are spoken throughout the Bay Area. Since learning a new language is universally challenging, it is not uncommon for residents who have immigrated to the United States to have limited English proficiency. This limit can lead to additional disparities if there is a disruption in housing, such as an eviction, because residents might not be aware of their rights, or they might be wary to engage due to immigration status concerns.

In Los Altos, 2.0 percent of residents five years and older identify as speaking English not well or not at all, which is below the proportion for Santa Clara County. Throughout the region the proportion of residents five years and older with limited English proficiency is 7.8 percent. In Los

Altos, this includes a variety of non-English speakers such as Chinese (Mandarin, Cantonese, etc.), Korean, Spanish, and others.[8]

Figure A-29: Population with Limited English Proficiency



Notes:

Universe: Population 5 years and over

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B16005)

A.3.5 Displacement

Because of increasing housing prices, displacement is a major concern in the Bay Area. Displacement has the most severe impacts on low- and moderate-income residents. When individuals or families are forced to leave their homes and communities, they also lose their support network.

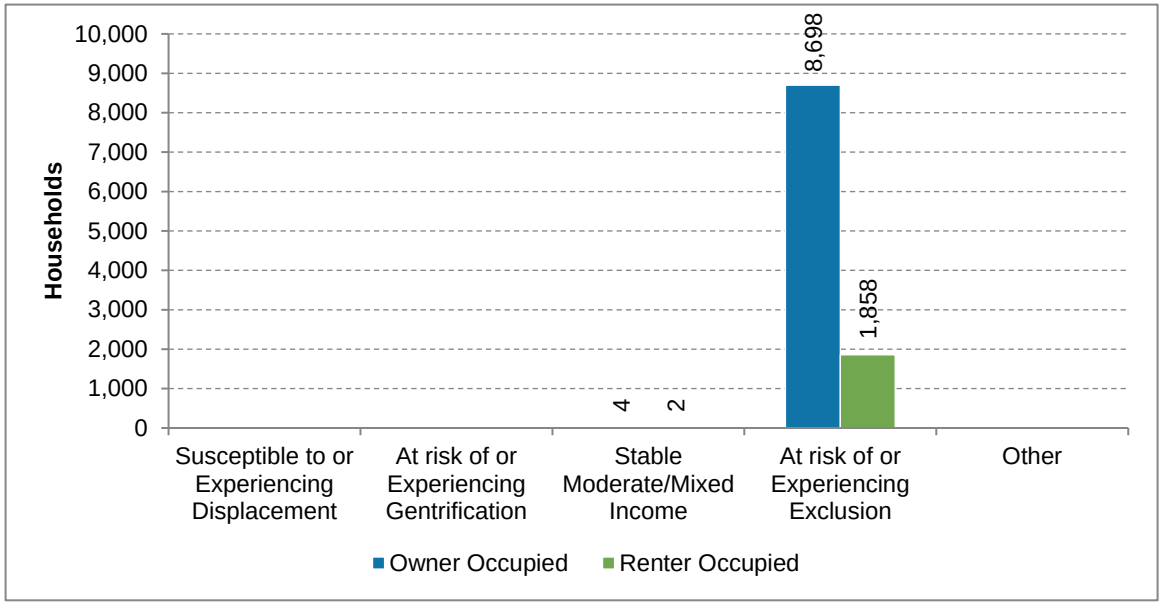
The University of California, Berkeley has mapped all neighborhoods in the Bay Area, identifying their risk for gentrification. In Los Altos, it was found that there are no households that live in

[8] U.S. Census, American Community Survey 5-Year Data (2015-2019), Table C16001.

neighborhoods that are susceptible to or experiencing displacement and at risk of or undergoing gentrification.

Equally important, some neighborhoods in the Bay Area do not have housing appropriate for a broad section of the workforce. UC Berkeley estimates that 99.9 percent of households in Los Altos live in neighborhoods where low-income households are likely to be excluded due to prohibitive housing costs. Programs are included to facilitate housing for low-income households in Los Altos.

Figure A-30: Households by Displacement Risk and Tenure



Notes:

Universe: Households

Displacement data is available at the census tract level. Staff aggregated tracts up to jurisdiction level using census 2010 population weights, assigning a tract to jurisdiction in proportion to block level population weights. Total household count may differ slightly from counts in other tables sourced from jurisdiction level sources. Categories are combined as follows for simplicity: At risk of or Experiencing Exclusion: At Risk of Becoming Exclusive; Becoming Exclusive; Stable/Advanced Exclusive At risk of or Experiencing Gentrification: At Risk of Gentrification; Early/Ongoing Gentrification; Advanced Gentrification Stable Moderate/Mixed Income: Stable Moderate/Mixed Income Susceptible to or Experiencing Displacement: Low- Income/Susceptible to Displacement; Ongoing Displacement Other: High Student Population; Unavailable or Unreliable Data.

Source: ABAG 2021 Pre-certified Housing Needs Data (Urban Displacement Project for classification, American Community Survey 5-Year Data (2015-2019), Table B25003 for tenure)

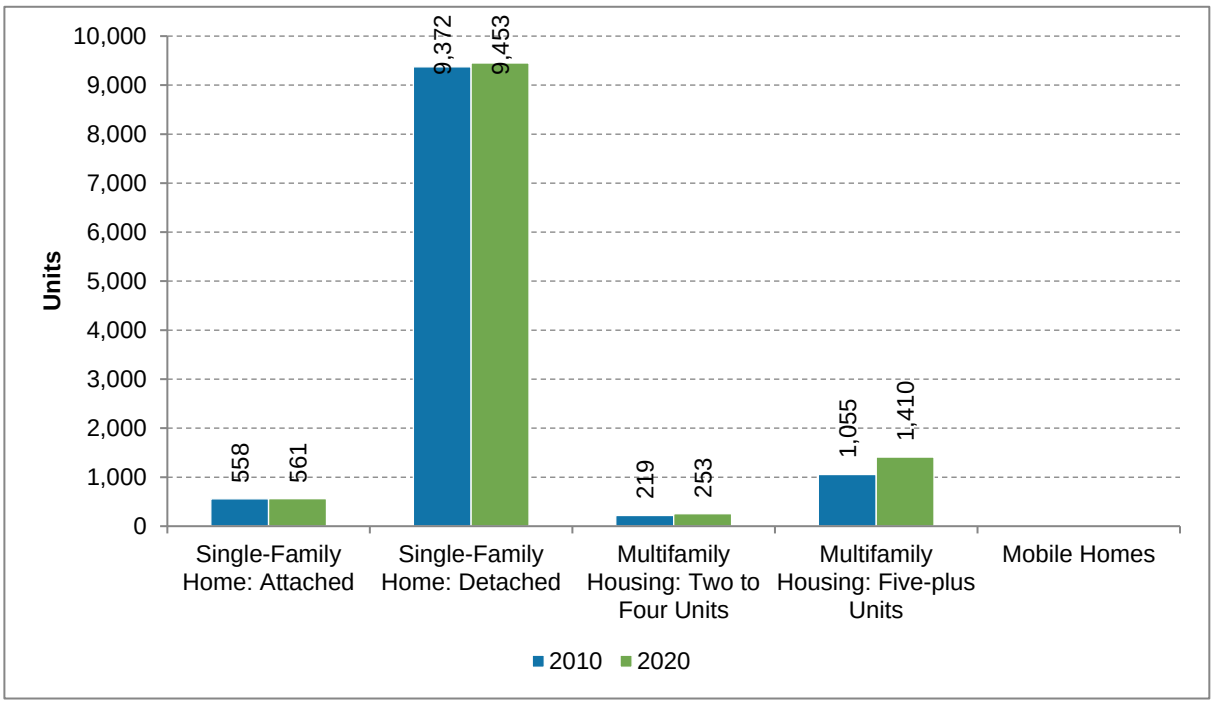
Section A.4 Housing Stock Characteristics

A.4.1 Housing Type and Vacancy

In recent years, most housing produced in the region and across the state consisted of single-family homes and larger multi-unit buildings. However, some households are increasingly interested in "missing middle housing" – including duplexes, triplexes, townhomes, cottage clusters and accessory dwelling units (ADUs). These housing types may open up more options across incomes and tenure, from young households seeking homeownership options to seniors looking to downsize and age-in-place.

Los Altos' housing stock in 2020 was made up of 81.0 percent single family detached homes, 4.8 percent single family attached homes, 2.2 percent multi-family homes with two to four units, 12.1 percent multi-family homes with five or more units, and no mobile homes. In Los Altos, the housing type that experienced the most growth between 2010 and 2020 was Multi-family Housing: Five-plus Units (see Figure A-31). Total housing unit growth between 2010 and 2020 was 4.2 percent in Los Altos, compared to 6.7 percent in Santa Clara County.

Figure A-31: Housing Type Trends



Source: ABAG 2021 Pre-certified Housing Needs Data (California Department of Finance, E-5 series)

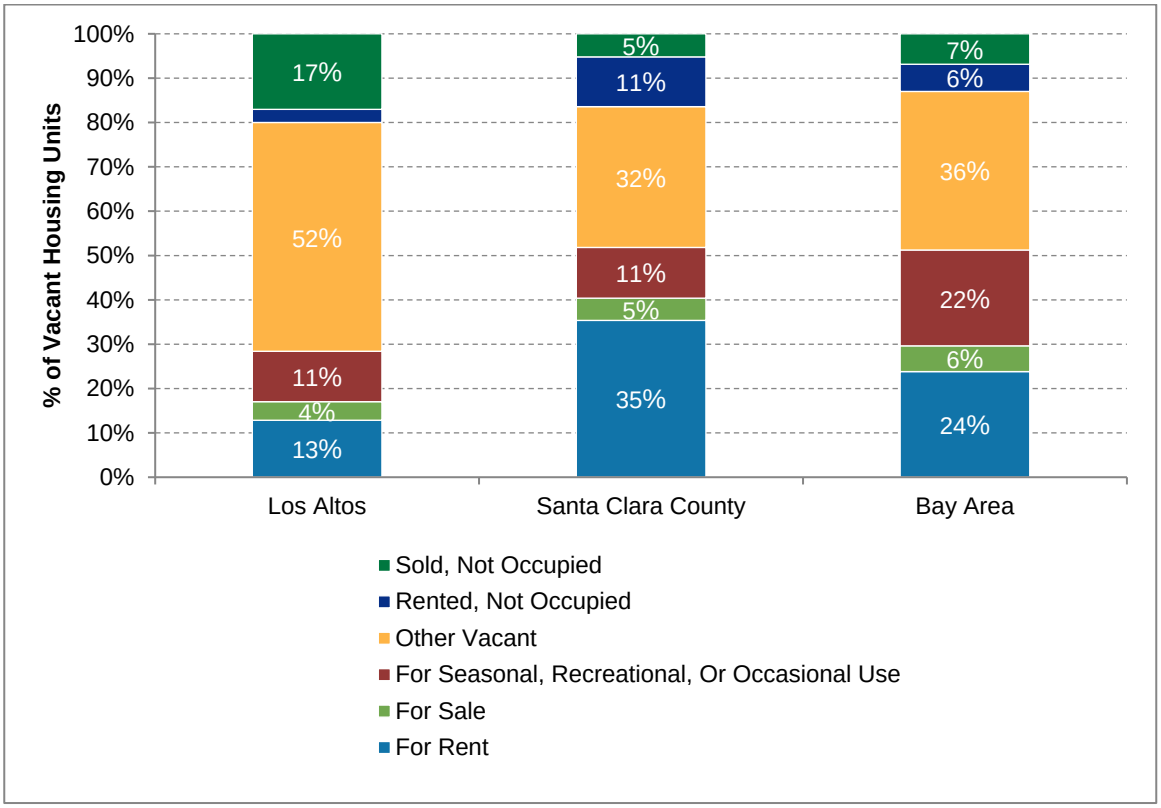
Vacant units make up 3.7 percent of the overall housing stock in Los Altos. According to the 2020 Census, vacant housing units were 5.3 percent of the overall housing stock. The rental vacancy stands at 3.1 percent, while the ownership vacancy rate is 1.0 percent. Of the vacant units, the most common type of vacancy is Other Vacant (see Figure A-32).[9]

Throughout the Bay Area, vacancies make up 2.6 percent of the total housing units, with homes listed for rent; units used for recreational or occasional use, and units not otherwise classified (other vacant) making up the majority of vacancies. The Census Bureau classifies a unit as vacant if no one is occupying it when census interviewers are conducting the American Community Survey or Decennial Census. Vacant units classified as "for recreational or occasional use" are those that are held for short-term periods of use throughout the year. Accordingly, vacation rentals and short-term rentals like AirBnB are likely to fall in this category.[10] The Census Bureau classifies units as "other vacant" if they are vacant due to foreclosure, personal/family reasons, legal proceedings, repairs/renovations, abandonment, preparation for being rented or sold, or vacant for an extended absence for reasons such as a work assignment, military duty, or incarceration. In a region with a thriving economy and housing market like the Bay Area, units being renovated/repaired and prepared for rental or sale are likely to represent a large portion of the "other vacant" category. Additionally, the need for seismic retrofitting in older housing stock could also influence the proportion of "other vacant" units in some jurisdictions. The largest share of vacancies in Los Altos is due to "other vacant" reasons, similar to that of Santa Clara County and the Bay Area.

[9] The vacancy rates by tenure is for a smaller universe than the total vacancy rate first reported, which in principle includes the full stock (3.7 percent). The vacancy by tenure counts are rates relative to the rental stock (occupied and vacant) and ownership stock (occupied and vacant) - but exclude a significant number of vacancy categories, including the numerically significant "other vacant".

[10] The City does not permit short-term rentals of fewer than 30 days anywhere in the city.

Figure A-32: Vacant Units by Type



Notes:

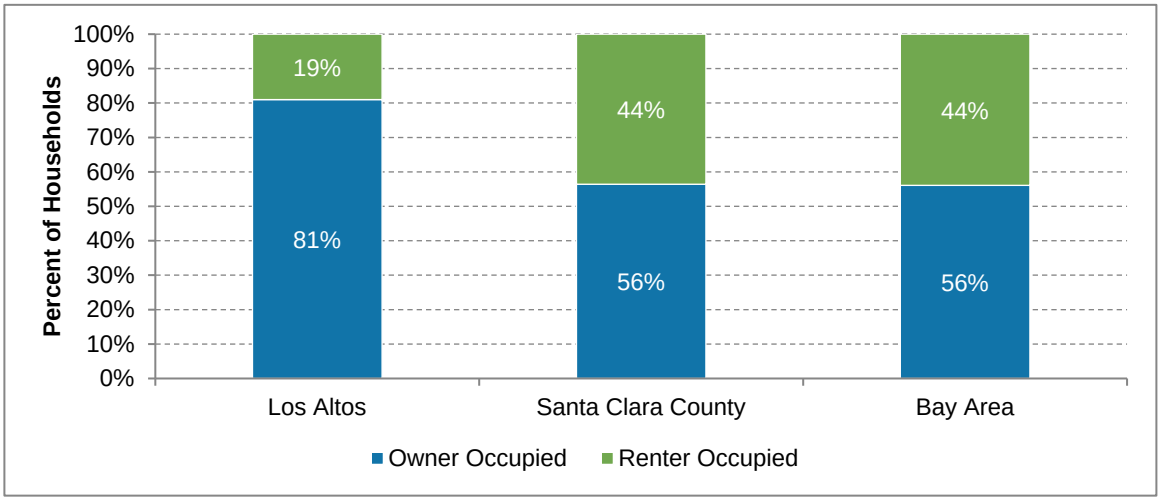
Universe: Vacant housing units

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25004)

A.4.2 Housing Tenure

The number of residents who own their homes compared to those who rent their homes can help identify the level of housing insecurity – ability for individuals to stay in their homes – in a city and region. Generally, renters may be displaced more quickly if prices increase. In Los Altos there are a total of 10,652 housing units, and fewer residents rent than own their homes: 19 percent versus 81 percent (see Figure A-33). By comparison, 44 percent of householders in Santa Clara County and the Bay Area rent their homes. Therefore, Los Altos has a higher share of owner-occupied households than the county or region.

Figure A-33: Housing Tenure



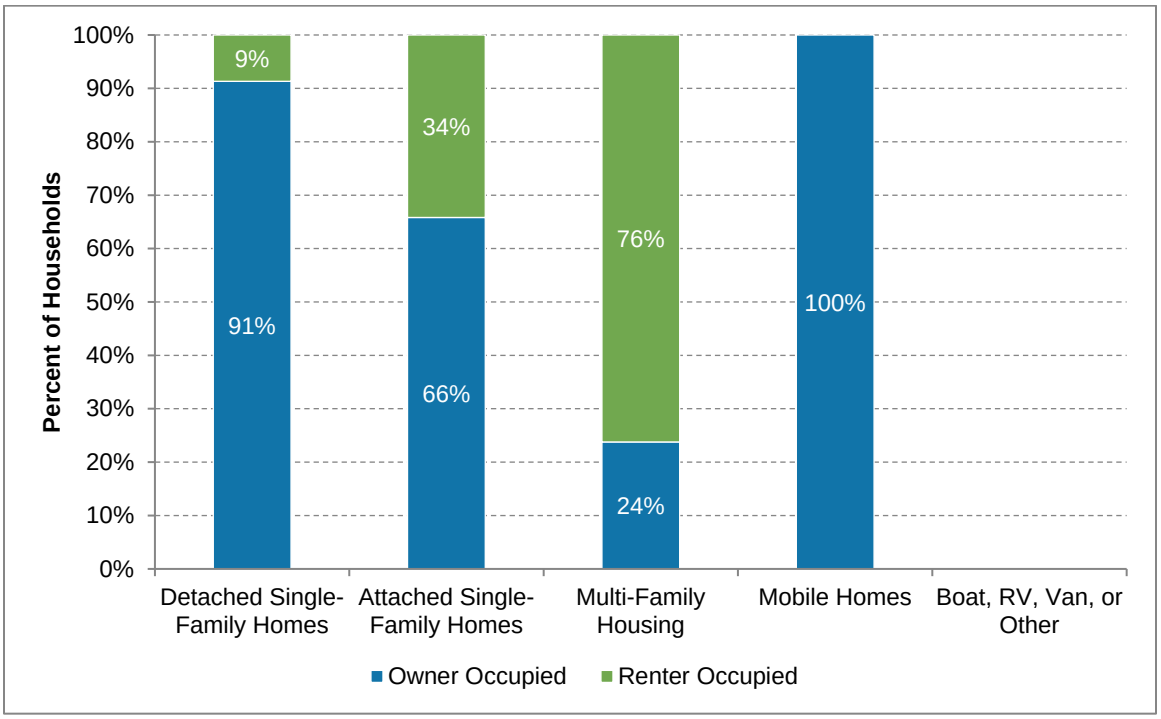
Notes:

Universe: Occupied housing units

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25003)

In many cities, homeownership rates for households in single-family homes are substantially higher than the rates for households in multi-family housing. In Los Altos, 91 percent of households in detached single-family homes are homeowners, while 24 percent of households in multi-family housing are homeowners (see Figure A-34). Therefore, most households in multi-family units in Los Altos are renters.

Figure A-34: Housing Tenure by Housing Type



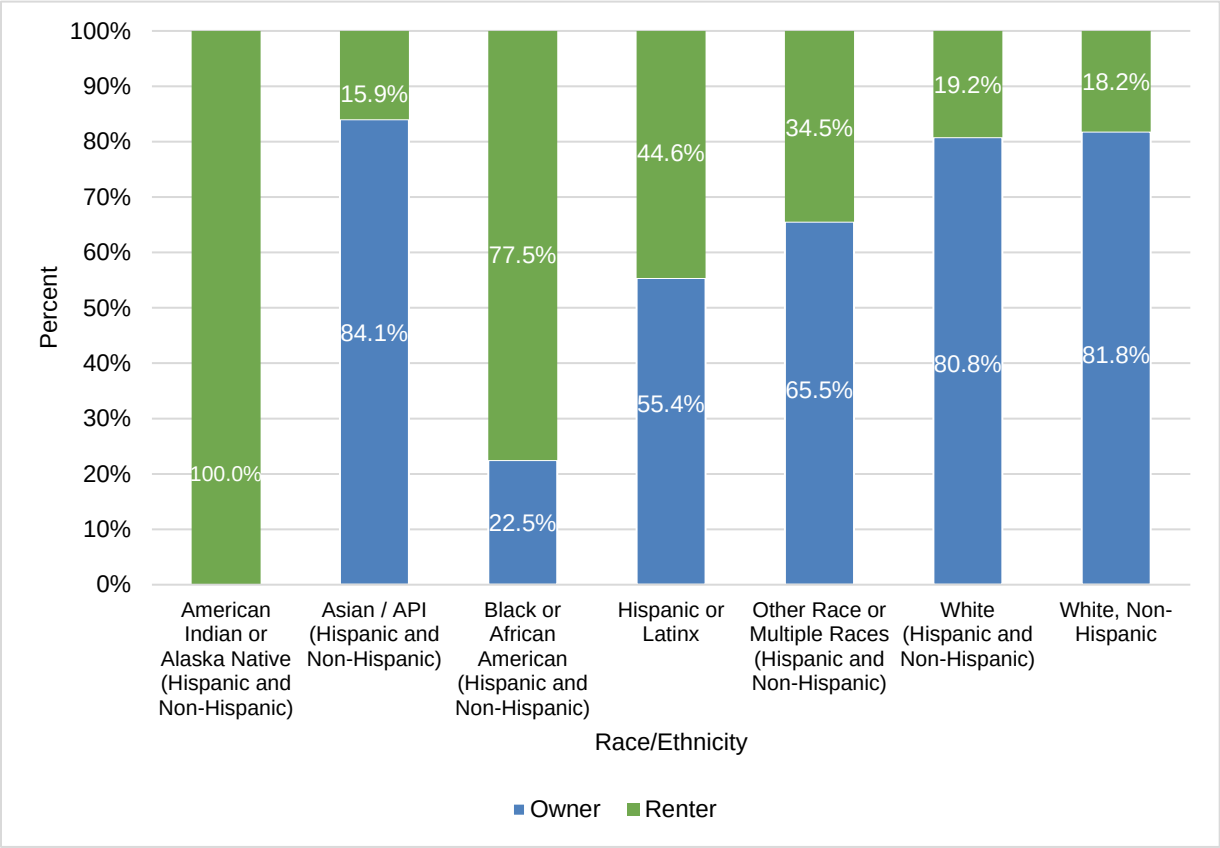
Notes:

Universe: Occupied housing units

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25032)

Homeownership rates often vary considerably across race/ethnicity in the Bay Area and throughout the country. These disparities not only reflect differences in income and wealth but also stem from federal, state, and local policies that limited access to homeownership for communities of color while facilitating homebuying for white residents. While many of these policies, such as redlining, have been formally disbanded, the impacts of race-based policy are still evident across Bay Area communities. In Los Altos, 22.5 percent of Black or African American households owned their homes, while homeownership rates were 84.1 percent for Asian/API households, 55.4 percent for Hispanic or Latinx households, and over 80 percent for White households. Notably, recent changes to State law require local jurisdictions to examine these dynamics and other fair housing issues when updating their Housing Elements. Overall, the two groups with the lowest rates of home ownership are American Indian or Alaskan Native and Black or African American households.

Figure A-35: Housing Tenure by Race of Householder



Notes:

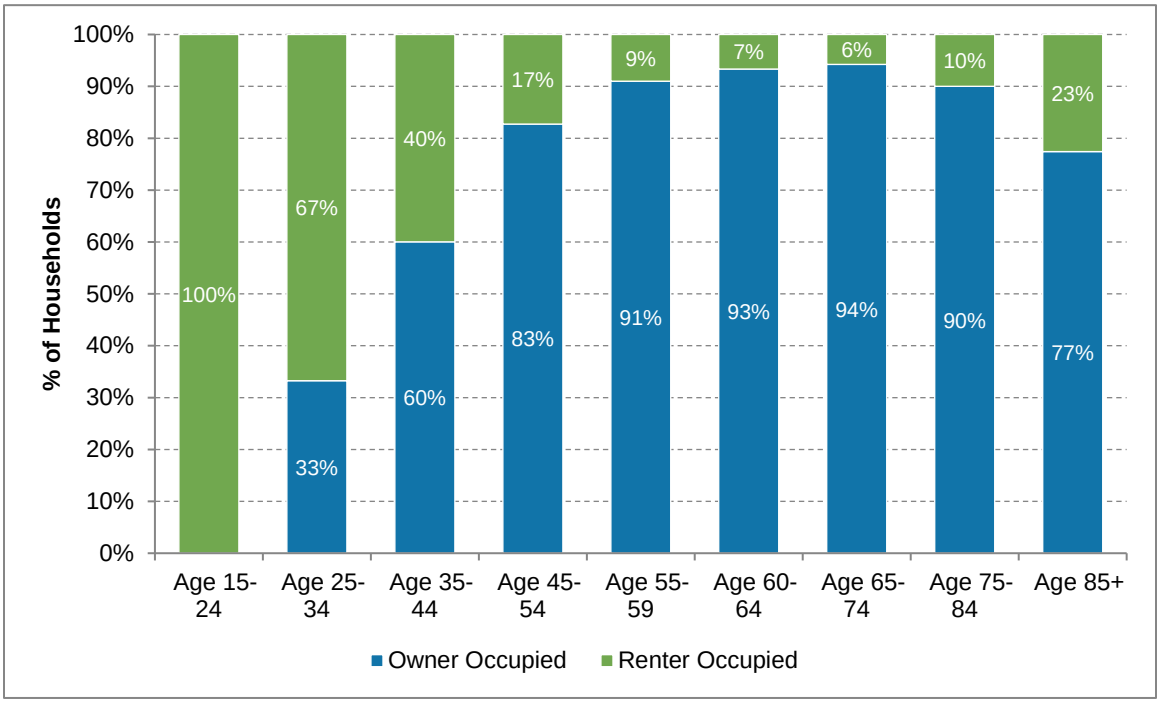
Universe: Occupied housing units

For this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity. However, data for the white racial group is also reported for white householders who are not Hispanic/Latinx. Since residents who identify as white and Hispanic/Latinx may have very different experiences within the housing market and the economy from those who identify as white and non-Hispanic/Latinx, data for multiple white sub-groups are reported here. The racial/ethnic groups reported in this table are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the total number of occupied housing units for this jurisdiction. However, all groups labelled “Hispanic and Non-Hispanic” are mutually exclusive, and the sum of the data for these groups is equivalent to the total number of occupied housing units.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25003(A-I))

The age of residents who rent or own their home can also signal the housing challenges a community is experiencing. Younger households tend to rent and may struggle to buy a first home in the Bay Area due to high housing costs. At the same time, senior homeowners seeking to downsize may have limited options in an expensive housing market. In Los Altos, 45.4 percent of householders between the ages of 25 and 44 are renters, while 10.6 percent of householders over 65 are renters (see Figure A-36).

Figure A-36: Housing Tenure by Age



Notes:

Universe: Occupied housing units

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25007)

A.4.3 Housing Units Permitted

Between 2015 and 2020, 114 housing units were issued permits in Los Altos. Of these housing units permitted, 97.4 percent were for above moderate-income housing, less than two percent were for low or very low-income housing, and less than one percent was for moderate income units (see Table A-13). Because a large share of its 6th Cycle RHNA is allocated for lower-income housing (approximately 40 percent of total RHNA, or 789 units), the City's housing plan (Section IV) contains additional programs and policies to increase representation of very low, low, and moderate-income units permitted.

Table A-13: Housing Permitting, 2015-2020

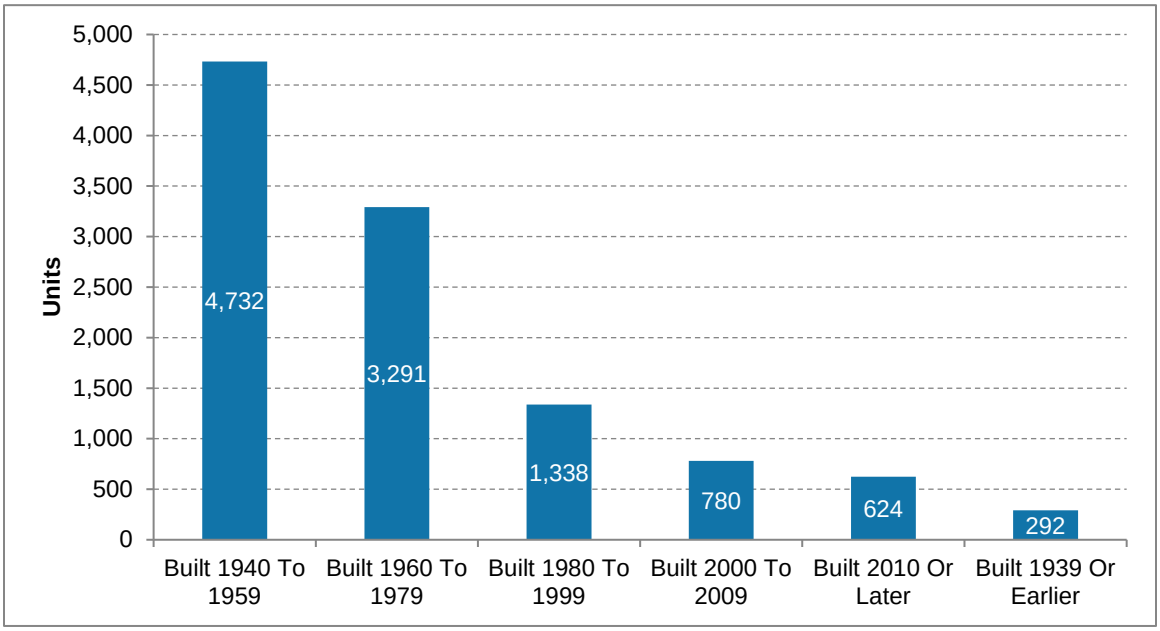
Income Group	Number of Units
Above Moderate-Income Permits	111
Moderate Income Permits	1
Low Income Permits	2
Very Low-Income Permits	0
Total	**114**
Source: City of Los Altos	

A.4.4 Housing Age and Condition

The age of housing stock is a key indicator of the community's overall housing condition. As homes get older, there is a greater need for maintenance, repair, and/or replacement of key infrastructure systems. If not properly addressed, an aging housing stock can represent poorer living standards, incur more expensive repair costs and, under certain conditions, lower overall property values.

Production has not kept up with housing demand for several decades in the Bay Area, as the total number of units built and available has not yet come close to meeting the population and job growth experienced throughout the region. In Los Altos, the largest proportion of the housing stock was built between 1940 to 1959, with 4,732 units constructed during this period (see Figure A-37). The housing stock in Santa Clara County is newer than that of Los Altos, with the largest portion of units built 1960 to 1979. Based on U.S. Census Bureau American Community Survey (ACS) data, of the Santa Clara County housing stock, 22.6 percent was built before 1960; while 45.4 percent of Los Altos' housing stock was built before 1960. Since 2010, 5.6 percent of the current housing stock, or 624 units, was built according to ACS data.

Figure A-37: Housing Units by Year Structure Built



Notes:

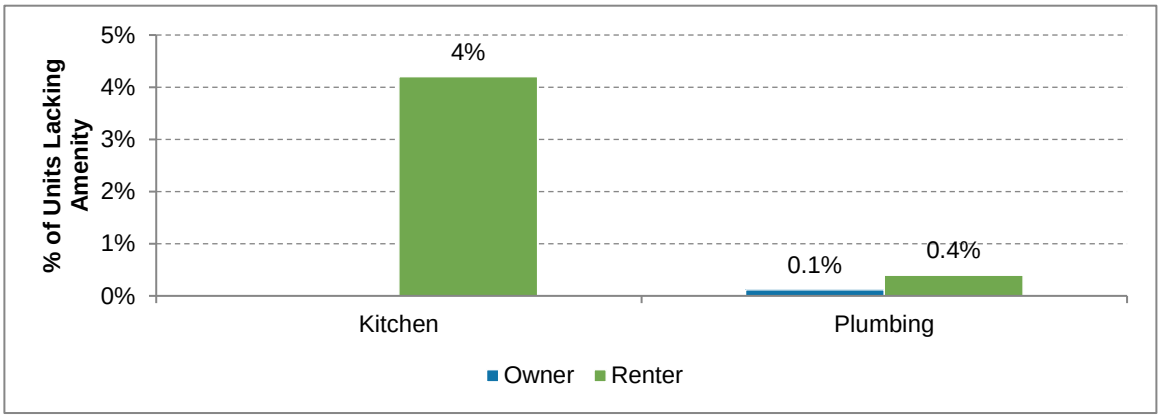
Universe: Housing units

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25034)

Substandard Housing

Housing costs in the region are among the highest in the country, which could result in households, particularly renters, needing to live in substandard conditions in order to afford housing. Generally, there is limited data on the extent of substandard housing issues in a community. However, the Census Bureau data included in the graph below gives a sense of some of the substandard conditions that may be present in Los Altos. For example, 4.2 percent of renters (85 units) in Los Altos reported lacking a kitchen and 0.4 percent of renters (eight units) lacked plumbing, compared to 0.0 percent of owners who lacked a kitchen and 0.1 percent of owners (9 units) who lacked plumbing (see Figure A-38).

Figure A-38: Substandard Housing Issues



Notes: Per HCD guidance, this data should be supplemented by local estimates of units needing to be rehabilitated or replaced based on recent windshield surveys, local building department data, knowledgeable builders/developers in the community, or nonprofit housing developers or organizations.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25053, Table B25043, Table B25049)

The City provided additional information on residential code enforcement cases in Los Altos. Since 2015, there were only five cases regarding substandard housing conditions. These cases related to unpermitted work, dilapidated conditions, and/or no functional heat. The City works diligently with property owners to address these issues and only has one active case related to substandard housing conditions.

The City's Code Enforcement Division estimates that between five and 10 residential units in Los Altos require major rehabilitation. This estimate is based on the Code Enforcement staff's processing of code compliance cases and familiarity with Los Altos neighborhoods and buildings. Although this is a small number of units, the City will continue to implement its code inspection and enforcement program to address substandard housing conditions (Program 5.D).

Section A.5 Housing Costs and Affordability

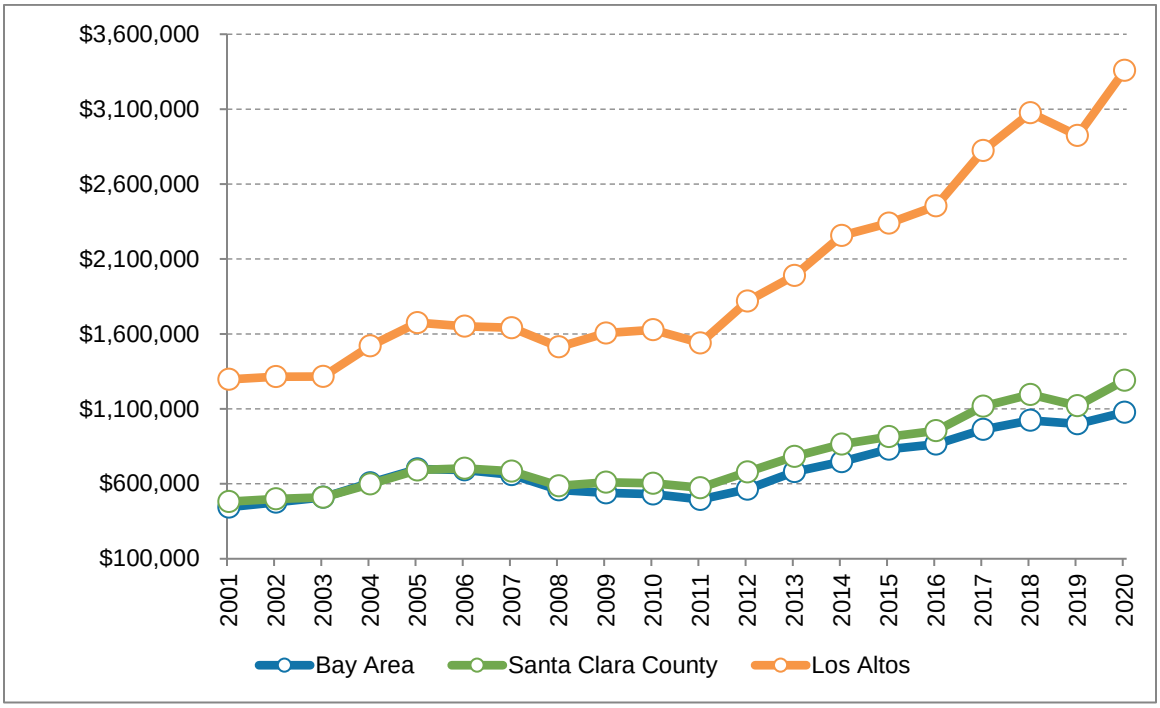
A.5.1 Ownership Costs

Home prices reflect a complex mix of supply and demand factors, including an area's demographic profile, labor market, prevailing wages and job outlook, coupled with land and construction costs. In the Bay Area, the costs of housing have long been among the highest in the nation. The typical home value in Los Altos was estimated at $3,358,590 by December of 2020, per data from Zillow (see Figure A-39).[11] By comparison, the typical home value was $1,290,970 in Santa Clara County and $1,077,230 in the Bay Area.

The region's home values have increased steadily since 2000, besides a decrease during the Great Recession. The rise in home prices has been especially steep since 2012, with the home value in the Bay Area nearly doubling during this time. Between 2001 and 2020, the typical home value increased by 159 percent in Los Altos. The rate of growth for home values in Los Altos was less than for Santa Clara County (168 percent), but greater than for the Bay Area (142 percent) (see Figure A-39).

[11] According to the Zillow Home Value Index (ZHVI), typical home values in Los Altos increased to over $3.5 million in 2021.

Figure A-39: Zillow Home Value Index (ZHVI)



Notes:

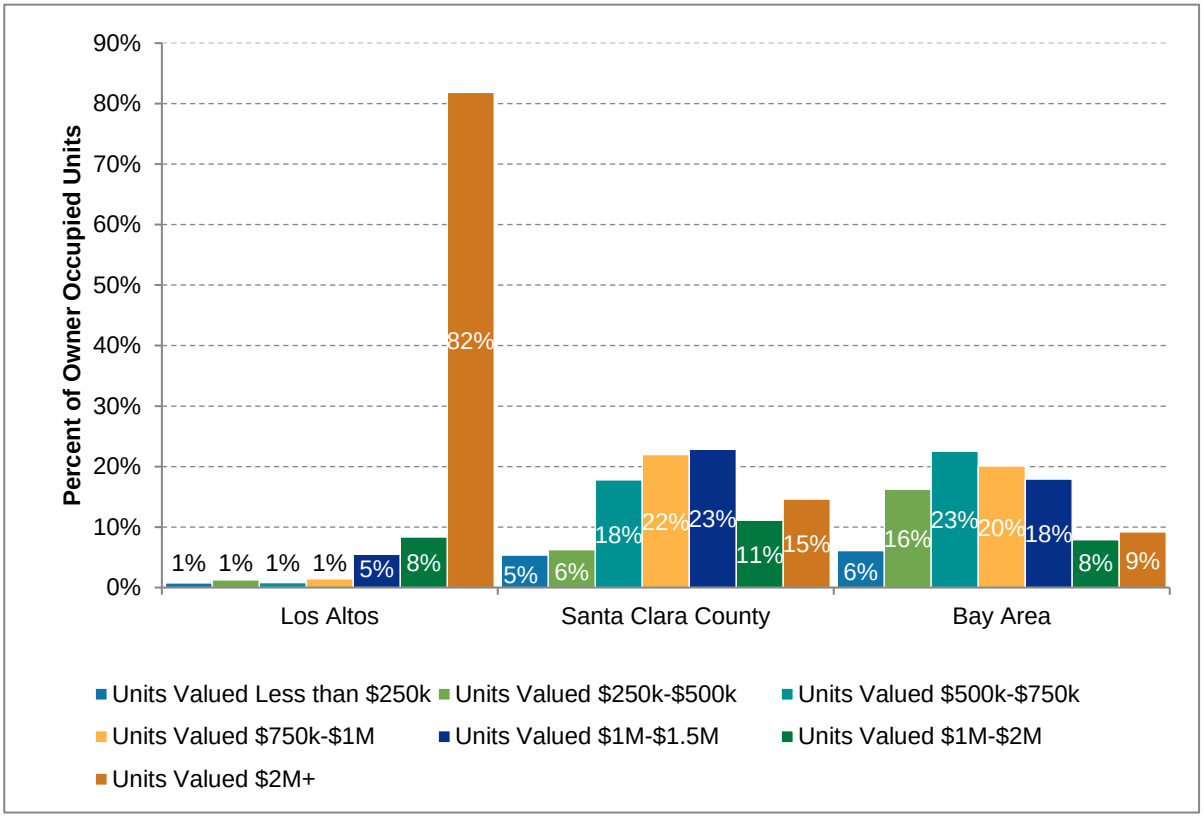
Universe: Owner-occupied housing units

Zillow describes the ZHVI as a smoothed, seasonally adjusted measure of the typical home value and market changes across a given region and housing type. The ZHVI reflects the typical value for homes in the 35th to 65th percentile range. The ZHVI reflects the typical value for homes in the 35th to 65th percentile range. The ZHVI includes all owner-occupied housing units, including both single-family homes and condominiums. More information on the ZHVI is available from Zillow. The regional estimate is a household-weighted average of county-level ZHVI files, where household counts are yearly estimates from DOF's E-5 series. For unincorporated areas, the value is a population weighted average of unincorporated communities in the county matched to census-designated population counts.

Source: ABAG 2021 Pre-certified Housing Needs Data (Zillow, Zillow Home Value Index (ZHVI))

Based on U.S. Census data, which often lags market valuations, the largest proportion of homes in Los Altos were valued at $2M+ (see Figure A-40). By comparison, the largest share of units in the county were valued between $1M and $1.5M and between $500,000 and $750,000 in the Bay Area.

Figure A-40: Home Values of Owner-Occupied Units



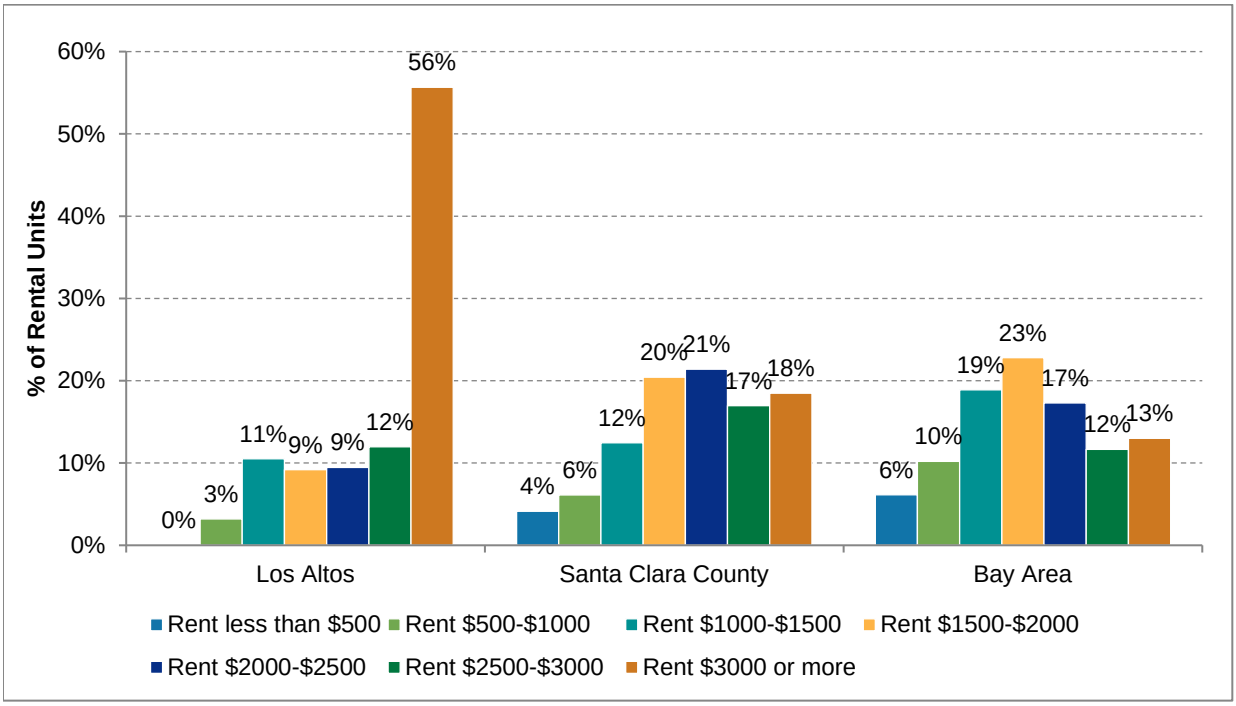
Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25075)

A.5.2 Rental Costs

Similar to home values, rents have also increased dramatically across the Bay Area in recent years. Many renters have been priced out, evicted or displaced, particularly communities of color. Residents finding themselves in one of these situations may have had to choose between commuting long distances to their jobs and schools or moving out of the region, and sometimes, out of the state.

It is more expensive to rent a home in Los Altos than it is in Santa Clara County and the Bay Area. Based on U.S. Census data 55.7 percent of rental units in Los Altos rented for $3,000 or more per month, and 12.0 percent of units rented at $2,500 to $3,000 per month (see Figure A-41). In the county, the largest share of units is in the $2,000 to $2,500 range compared to the $1,500 to $2,000 range for the Bay Area as a whole.

Figure A-41: Contract Rents for Renter-Occupied Units



Notes:

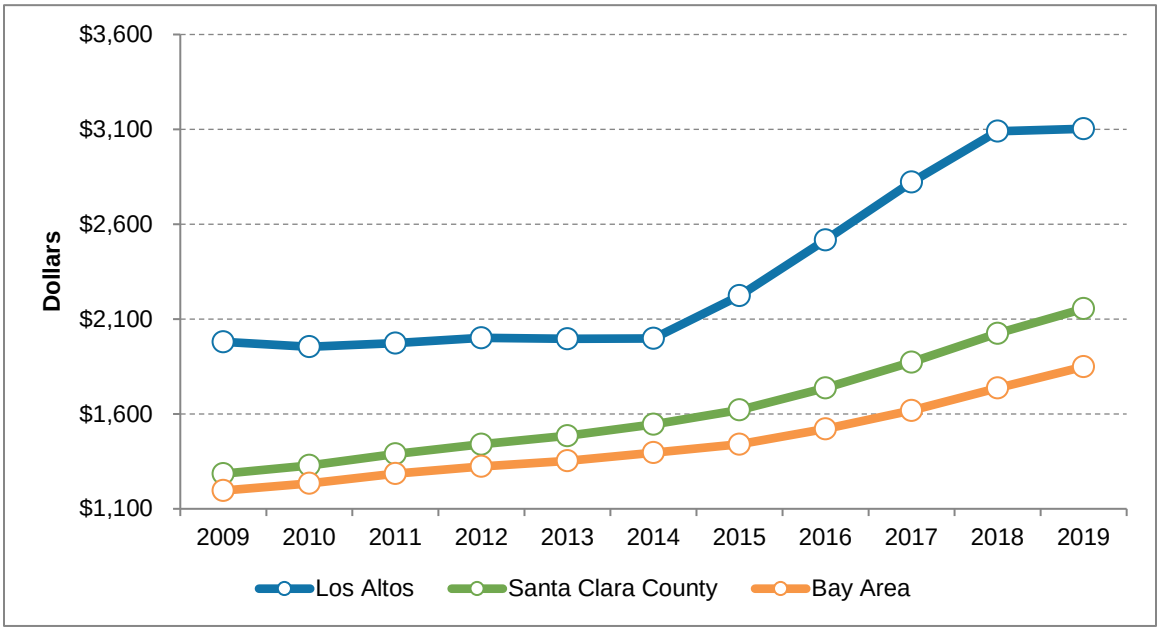
Universe: Renter-occupied housing units paying cash rent

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25056)

According to U.S. Census Data, the median rent in Los Altos has increased by 56.7 percent since 2009, from $1,980 to $3,103 per month (see Figure A-42). In Santa Clara County, the median rent has increased 67.7 percent, from $1,285 to $2,155. The median rent in the region has also increased during this time from $1,200 to $1,850, a 54 percent increase. While Los Altos' rent increase outpaced the Bay Area but not the county, Los Altos' rent is 1.4 times greater than that of the county.

Since U.S. Census data often lags market rates, Zillow rental data was obtained to provide more current market rates. Zillow data shows that the typical observed rent price for all housing unit types was approximately $6,490 per month in October 2022.

Figure A-42: Median Contract Rent



Notes:

Universe: Renter-occupied housing units paying cash rent

For unincorporated areas, median is calculated using distribution in B25056.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data releases, starting with 2005-2009 through 2015-2019, B25058, B25056 (for unincorporated areas). County and regional counts are weighted averages of jurisdiction median using B25003 rental unit counts from the relevant year)

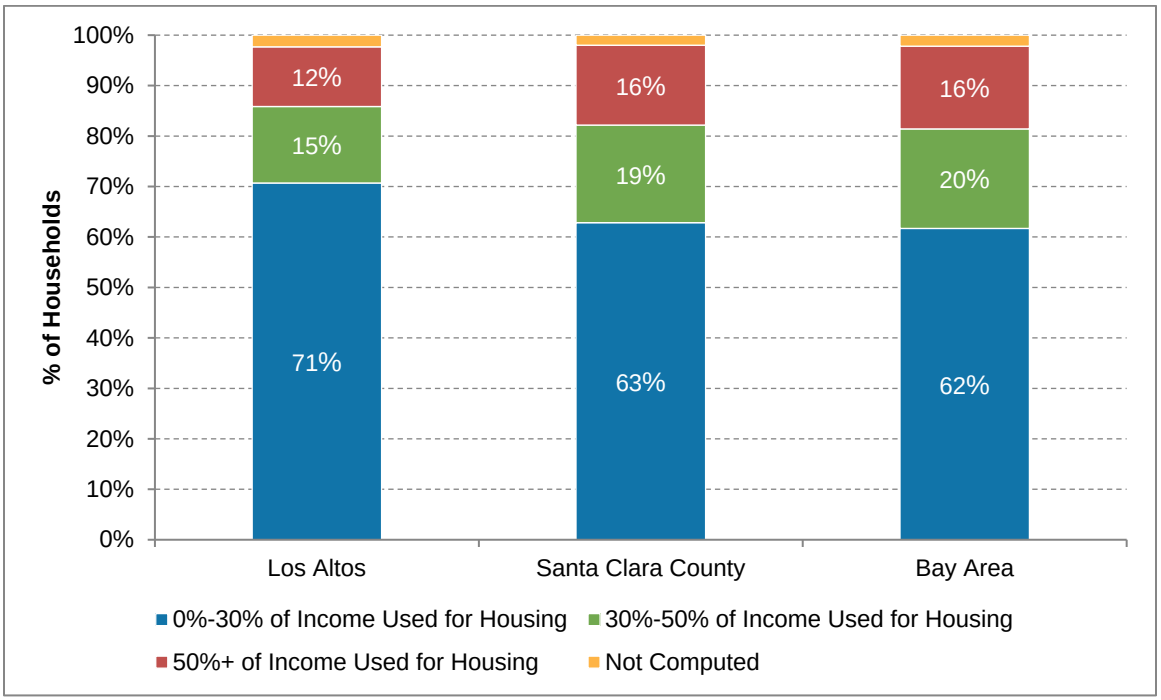
A.5.3 Overpayment

A standard measure of housing affordability can be determined by comparing the cost of market rate housing to the price residents can afford to pay for housing based on their income levels. A household is considered “cost burdened” if it spends more than 30 percent of its monthly income on housing costs, while those who spend more than 50 percent of their income on housing costs are considered “severely cost burdened.” Low-income residents are the most impacted by high housing costs and experience the highest rates of cost burden. When a household is overpaying for housing costs, the household has less disposable income for other necessities, including health care, food, and clothing. Spending such large portions of their income on housing puts low-income households at higher risk of displacement, eviction, or homelessness. In the event of unexpected circumstances, such as loss of employment and health problems, lower-income households with a burdensome housing cost are more likely to become homeless or be forced to double-up with other households.

Los Altos has a lower proportion of cost-burdened households compared to the county and the Bay Area. Of Los Altos’ households, approximately 15 percent are cost burdened (1,613

households), and 12 percent are severely cost burdened (1,260 households). In the county, the proportions (19 percent and 16 percent, respectively) are higher (see Figure A-43).

Figure A-43: Cost Burden Severity



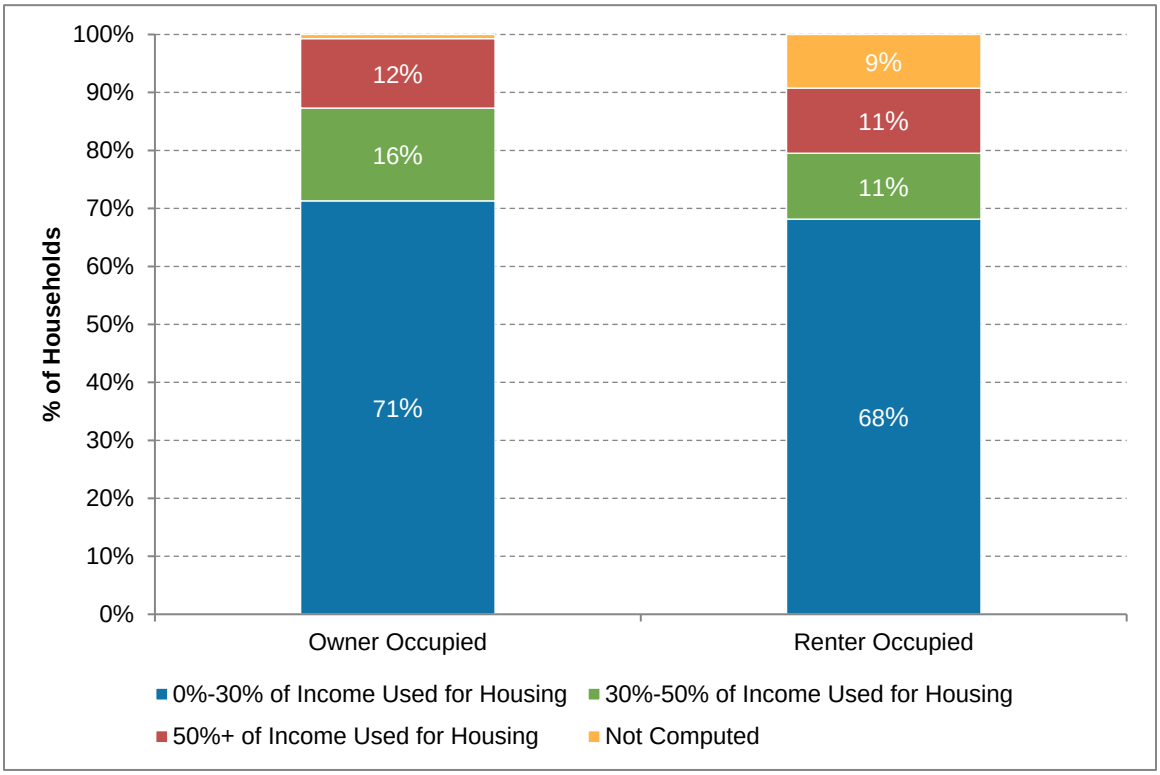
Notes:

Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50percent of monthly income.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25070, B25091)

Renters are often more cost-burdened than owners. While the housing market has resulted in home prices increasing dramatically, homeowners often have mortgages with fixed rates, whereas renters are more likely to be impacted by market increases. When looking at the cost burden across tenure in Los Altos, 11.4 percent of renter households (230 households) spend 30 to 50 percent of their income on housing compared to 16.0 percent of those that own (1,383 households) (see Figure A-44). Additionally, 11.2 percent of renter households (227 households) spend 50 percent or more of their income on housing, while 12.0 percent of owner households (1,033 households) are severely cost burdened. However, in Los Altos, homeowners are more cost burdened than renters. In total, almost 23 percent of renters (457 households) are cost burdened, compared to 28 percent of owners (2,416 households).

Figure A-44: Cost Burden by Tenure



Notes:

Universe: Occupied housing units

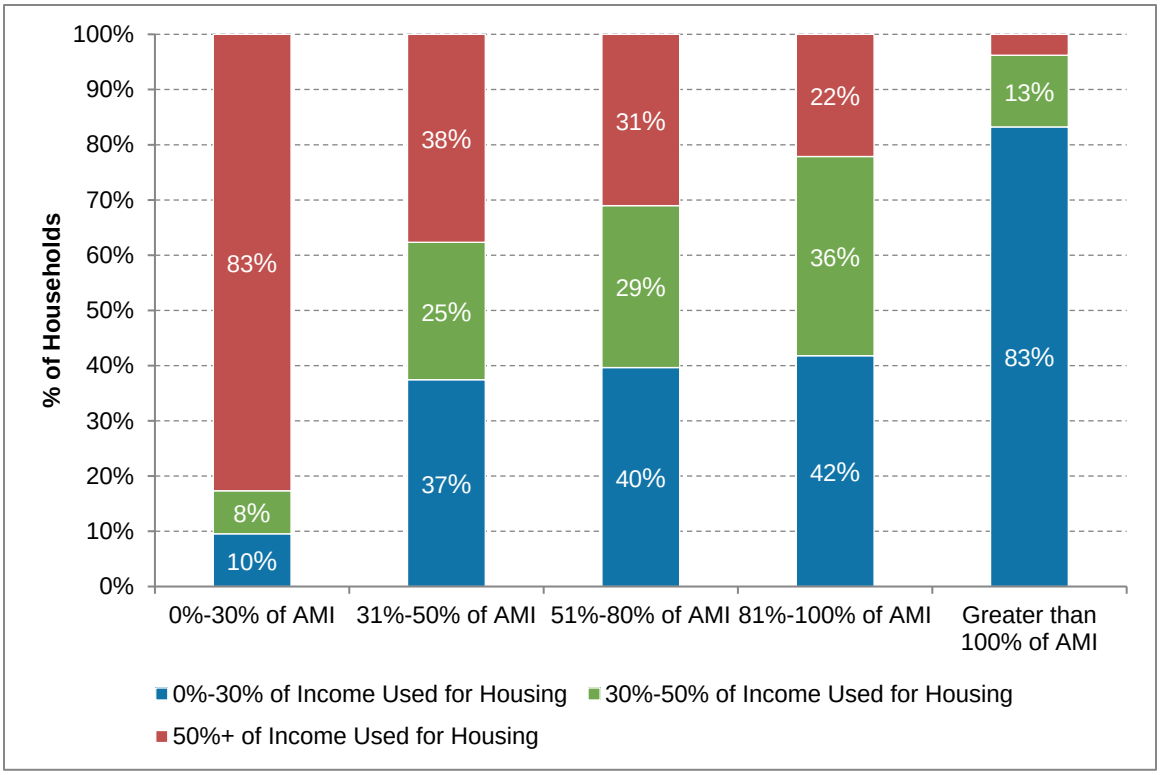
Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50percent of monthly income.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25070, B25091)

While approximately 12 percent of households spend 50 percent or more of their income on housing, and 15 percent spend 30 to 50 percent, these rates vary greatly across income categories (see Figure A-45). As expected, lower-income households are more likely to be housing cost burdened than higher-income households. For example, 82.7 percent of Los Altos households making no more than 30 percent of AMI (520 households) spend the majority of their income on housing. In total, 1,193 lower-income households (80 percent of AMI and below) are cost burdened. Over half of households earning between 80 and 100 percent of AMI are cost burdened (355 households). For Los Altos residents making more than 100 percent of AMI, just 3.8 percent are severely cost-burdened (310 households), and 83.2 percent of those making more than 100 percent of AMI spend less than 30 percent of their income on housing.

Low-income households that rent are also more likely to overpay for housing than low-income homeowners. Among low-income Los Altos households that are cost burdened, 21 percent (250 households) rent their home, and 79 percent (945) are homeowners.

Figure A-45: Cost Burden by Income Level



Notes:

Universe: Occupied housing units

Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50percent of monthly income. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Santa Clara and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.

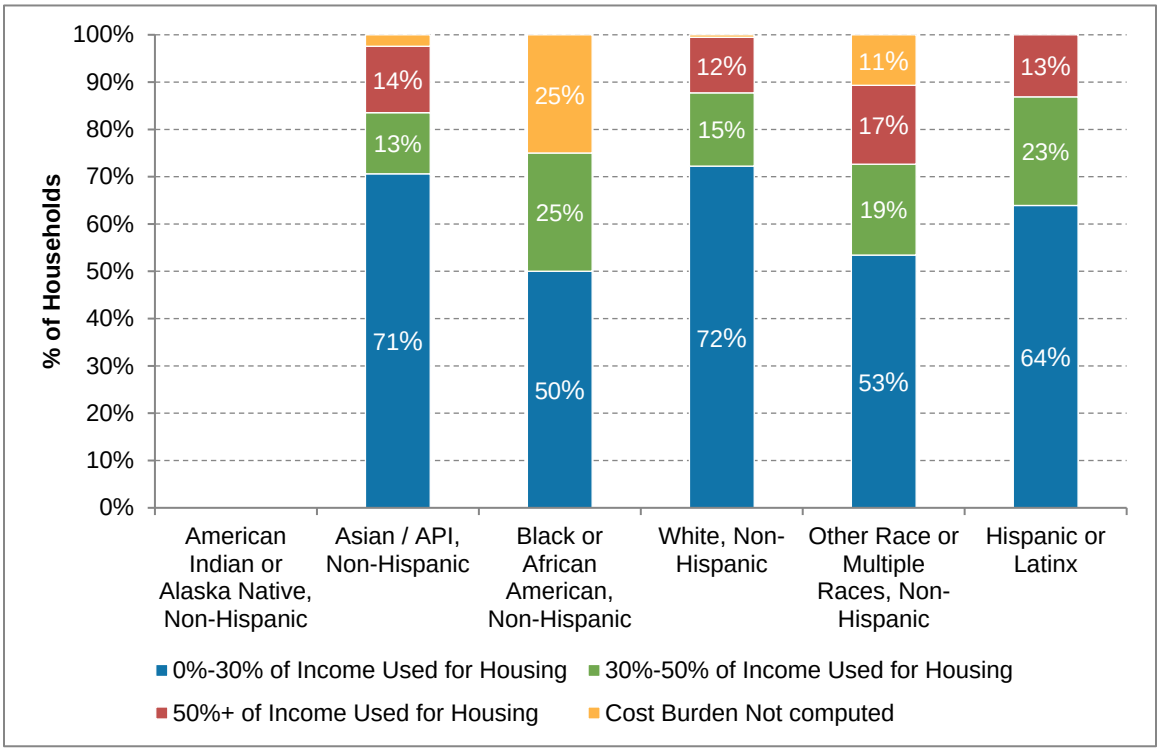
Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release)

Various policies and programs are included to provide more affordable housing options and reduce the level of overpayment experienced in Los Altos. These include programs for inclusionary housing (Program 2.A), assistance and incentives for affordable housing developments (Program 2.C), accessory dwelling units (Program 2.D), housing rehabilitation for low-income households (Program 5.E), and Housing Choice Vouchers (Program 6.D).

Currently, people of color are more likely to experience poverty and financial instability as a result of federal and local housing policies that have historically excluded them from the same opportunities extended to white residents. As a result, they often pay a greater percentage of their income on housing, and in turn, are at a greater risk of housing insecurity.

Black or African American (Non-Hispanic) households are the most cost burdened with 25.0 percent spending 30 to 50 percent of their income on housing, and Other Race or Multiple Races (Non-Hispanic) households are the most severely cost burdened with 16.7 percent spending more than 50 percent of their income on housing (see Figure A-46).

Figure A-46: Cost Burden by Race



Notes:

Universe: Occupied housing units

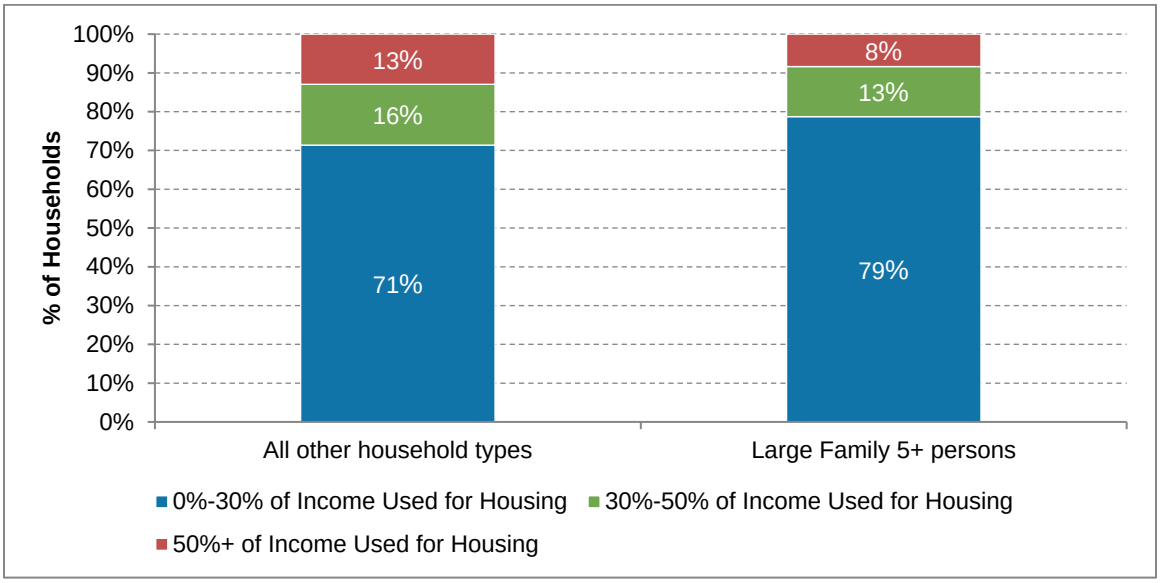
Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is “select monthly owner costs”, which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50percent of monthly income. For the purposes of this graph, the “Hispanic or Latinx” racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release)

Large family households often have special housing needs due to a lack of adequately sized affordable housing available. The higher costs required for homes with multiple bedrooms can result in larger families experiencing a disproportionate cost burden than the rest of the population and can increase the risk of housing insecurity.

In Los Altos, 12.9 percent of large family households experience a cost burden of 30 percent to 50 percent, while 8.3 percent of households spend more than half of their income on housing. Approximately 15.7 percent of all other households have a cost burden of 30 percent to 50 percent, with 12.9 percent of households spending more than 50 percent of their income on housing (see Figure A-47). Therefore, larger families in Los Altos are not significantly more likely to be cost burdened than all other household types.

Figure A-47: Cost Burden by Household Size



Notes:

Universe: Occupied housing units

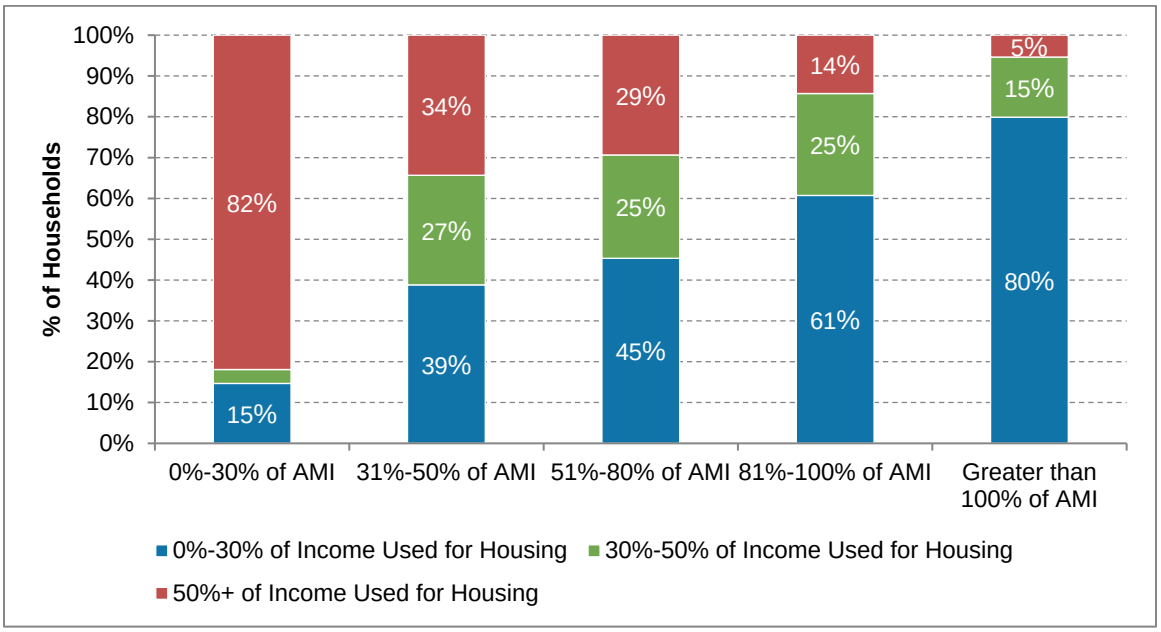
Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50percent of monthly income.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release)

When cost-burdened seniors are no longer able to make house payments or pay rents, displacement from their homes can occur, putting further stress on the local rental market or forcing residents out of the community they call home. Understanding how seniors might be cost-burdened is of particular importance due to their special housing needs, particularly for low-income seniors. 81.9 percent of senior households making less than 30 percent of AMI are spending the majority of their income on housing (335 households). For senior households

making more than 100 percent of AMI, 79.9 percent are not cost burdened and spend less than 30 percent of their income on housing (see Figure A-48). In total, 36.7 percent of all senior households are cost burdened (1,299 households), but almost 68 percent of low-income senior households are cost burdened (759 households).

Figure A-48: Cost-Burdened Senior Households by Income Level



Notes:

Universe: Senior households

For the purposes of this graph, senior households are those with a householder who is aged 62 or older. Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50percent of monthly income. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Santa Clara and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose- Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.

Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release)

Table A-14: Cost-Burdened Senior Households by Income Level

Income Group	0%-30% of Income Used For Housing	30%-50% of Income Used for Housing	50%+ of Income Used for Housing	% Cost Burdened
0%-30% of AMI	60	14	335	85.3%
31%-50% of AMI	130	90	115	61.2%
51%-80% of AMI	170	95	110	54.7%
81%-100% of AMI	170	70	40	39.3%
Greater than 100% of AMI	1,710	315	115	20.1%
Totals	**2,240**	**584**	**715**	**36.7%**
Source: ABAG 2021 Pre-certified Housing Needs Data (U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release)				

Housing Costs Compared to Ability to Pay

The ability to pay for housing is a function of housing cost and other essential living expenses in relation to household income. Since above-moderate income households do not generally have problems in locating affordable units, affordable units are frequently defined as those reasonably priced for households that are low to moderate income.

Table A-15 shows the 2021 income limits and compares these income limits to affordable rent and purchase prices (defined as being no more than 30 percent of gross income). The median gross rent in Los Altos (approximately $3,100 as seen in the Rental Costs section above) is affordable to those earning at least 100 percent of AMI. However, the median purchase price of a home in Los Altos (over $3M) is out of reach for even high-earning households. Based on December 2020 home price data, four-person households must earn well over more than 200 percent of AMI to be able to afford to buy a home in the city.

Table A-15: 2021 Santa Clara County Ability to Pay for Housing and Fair Market Rent and Purchase Prices

	Number of Persons in Household			
	1	2	3	4
Extremely Low (0-30% AMI)				
Annual Income Limit	$34,800	$39,800	$44,750	$49,700
Monthly Income	$2,900	$3,317	$3,729	$4,142
Max. Monthly Gross Rent[1]	$870	$995	$1,119	$1,243
Max. Purchase Price 5% down[2]	$145,700	$162,00	$193,200	$216,800
Max. Purchase Price 20% down[3]	$190,500	$221,700	$252,500	$283,500
Very Low (30-50% AMI)				
Annual Income Limit	$58,00	$66,300	$74,600	$82,850
Monthly Income	$4,833	$5,525	$6,217	$6,904
Max. Monthly Gross Rent[1]	$1,450	$1,658	$1,865	$2,071
Max. Purchase Price 5% down[2]	$256,300	$295,900	$335,400	$374,500
Max. Purchase Price 20% down[3]	$335,000	$386,800	$438,500	$489,600
Low (50-80% AMI)				
Annual Income Limit	$82,450	$94,200	$106,000	$117,750
Monthly Income	$6,871	$7,850	$8,833	$9,813
Max. Monthly Gross Rent[1]	$2,061	$2,355	$2,650	$2,944
Max. Purchase Price 5% down[2]	$372,600	$428,700	$484,800	$541,000
Max. Purchase Price 20% down[3]	$487,300	$560,400	$634,000	$707,200
Median (100% AMI)				
Annual Income Limit	$105,900	$121,050	$136,150	$151,300
Monthly Income	$8,825	$10,088	$11,346	$12,608
Max. Monthly Gross Rent[1]	$2,648	$3,026	$3,404	$3,783
Max. Purchase Price 5% down[2]	$484,500	$556,500	$628,500	$700,800
Max. Purchase Price 20% down[3]	$633,500	$727,500	$821,700	$916,300
Moderate (80-120% AMI)				
Annual Income Limit	$127,100	$145,250	$163,400	$181,550
Monthly Income	$10,592	$12,104	$13,617	$15,129
Max. Monthly Gross Rent[1]	$3,178	$3,631	$4,085	$4,539
Max. Purchase Price 5% down[2]	$585,500	$671,800	$758,300	$844,800
Max. Purchase Price 20% down[3]	$765,500	$878,300	$991,500	$1,104,500
120-150% AMI				
Annual Income Limit	$158,850	$181,575	$204,225	$226,950
Monthly Income	$13,283	$15,131	$17,019	$18,913

Table A-15: 2021 Santa Clara County Ability to Pay for Housing and Fair Market Rent and Purchase Prices

	Number of Persons in Household			
	1	2	3	4
Max. Monthly Gross Rent[1]	$3,971	$4,539	$5,106	$5,674
Max. Purchase Price 5% down[2]	$736,500	$844,800	$952,900	$1,061,000
Max. Purchase Price 20% down[3]	$963,000	$1,104,500	$1,245,800	$1,387,300
150-180% AMI				
Annual Income Limit	$190,620	$217,890	$245,070	$272,340
Monthly Income	$15,885	$18,158	$20,423	$22,695
Max. Monthly Gross Rent[1]	$4,766	$5,447	$6,127	$6,809
Max. Purchase Price 5% down[2]	$880,000	$1,017,800	$1,147,300	$1,277,300
Max. Purchase Price 20% down[3]	$1,161,000	$1,330,700	$1,500,000	$1,670,000
180-200% AMI				
Annual Income Limit	$211,800	$242,100	$272,300	$302,600
Monthly Income	$17,650	$20,175	$22,692	$25,217
Max. Monthly Gross Rent[1]	$5,295	$6,053	$6,808	$7,565
Max. Purchase Price 5% down[2]	$988,800	$1,133,200	$1,277,100	$1,421,300
Max. Purchase Price 20% down[3]	$1,292,700	$1,481,700	$1,669,600	$1,858,300

Notes:
[1] 30% of income devoted to maximum monthly rent or mortgage payment, including utilities, taxes, and insurance
[2] Assumes 95% loan (i.e., 5% down payment) @ 2.875% annual interest rate and 30-year term
[3] Assumes 80% loan (i.e., 20% down payment) @ 2.875% annual interest rate and 30-year term

Source: Zillow Mortgage Calculator

A.5.4 At-Risk Housing Assessment

While there is an immense need to produce new affordable housing units, ensuring that the existing affordable housing stock remains affordable is equally important. Additionally, it is typically faster and less expensive to preserve currently affordable units that are at risk of converting to market-rate than it is to build new affordable housing.

The data in the table below comes from the California Housing Partnership's Preservation Database, the state's most comprehensive source of information on subsidized affordable housing at risk of losing its affordable status and converting to market-rate housing. According to this database, there are zero assisted units in Los Altos in the Preservation Database. However, this database does not include all deed-restricted affordable units in the state, so the City has reviewed its records for below market rate regulatory agreements. The City has 105 deed restricted below market rate units, consisting of 51 rental units and 54 ownership units. These units have affordability periods of 30 to 55 years, with the newer deed restrictions having the 55-year term. Older contracts reset for an additional 30 years if sold within the restricted period, so

those contracts remain indefinitely. Therefore, no unit deed restricted to lower income households would expire in before 2033. Additionally, City Council has directed future rental inclusionary housing units to have affordability terms of 99 years and will consider requiring extended terms for ownership inclusionary housing units also (see Program 2.A).

Table A-16: Assisted Units at Risk of Conversion

Risk Level	Los Altos	Santa Clara County	Bay Area
Low	0	28,001	110,177
Moderate	0	1,471	3,375
High	0	422	1,854
Very High	0	270	1,053
Total Assisted Units in Database	0	30,164	116,459

Notes:

Universe: HUD, Low-Income Housing Tax Credit (LIHTC), USDA, and CalHFA projects. Subsidized or assisted developments that do not have one of the aforementioned financing sources may not be included.

While California Housing Partnership's Preservation Database is the state's most comprehensive source of information on subsidized affordable housing at risk of losing its affordable status and converting to market-rate housing, this database does not include all deed-restricted affordable units in the state. Consequently, there may be at-risk assisted units in a jurisdiction that are not captured in this data table. Housing Partnership uses the following categories for assisted housing developments in its database:

Very-High Risk: affordable homes that are at- risk of converting to market rate within the next year that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer.

High Risk: affordable homes that are at-risk of converting to market rate in the next 1-5 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer.

Moderate Risk: affordable homes that are at-risk of converting to market rate in the next 5-10 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer.

Low Risk: affordable homes that are at- risk of converting to market rate in 10+ years and/or are owned by a large/stable non-profit, mission-driven developer.

Source: ABAG 2021 Pre-certified Housing Needs Data (California Housing Partnership, Preservation Database (2020))

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Appendix B: Sites Inventory & Methodology

Contents

Section B.1 Introduction

B.1.1 Overview and Purpose

According to California Government Code §65580-65589, the housing element must include an inventory of adequate sites that are zoned and available within the planning period to meet the jurisdiction's fair share of regional housing needs across all income levels. The sites inventory, in addition to projected accessory dwelling units (ADUs) and entitled or in process development projects, assists in determining if the jurisdiction has enough developable land to meet its Regional Housing Needs Allocation (RHNA), given its current regulatory framework and market conditions. This Appendix details the sites inventory and supporting analysis methodology and assumptions.

B.1.2 Regional Housing Needs Allocation

Jurisdictions must provide sufficient land to accommodate enough housing for all economic segments of the community. Compliance is determined by the jurisdiction's ability to provide adequate development capacity through appropriate development regulations and land use policies. The number of new units that must be accommodated is established through each jurisdiction's share of the region's projected housing needs for the planning period. This share for each jurisdiction is called the Regional Housing Needs Allocation (RHNA).

The Association of Bay Area Governments (ABAG), a regional planning agency, is responsible for distributing the RHNA to each jurisdiction within its nine-county region (including the County of Santa Clara).[1] The RHNA is distributed by income category. For the 2023-2031 Housing Element update, Los Altos is allocated a RHNA of 1,958 units as follows:

- Very Low Income (less than 50 percent of AMI): 501 units (25 percent)
- Low Income (50 to 80 percent of AMI): 288 units (15 percent)
- Moderate Income (80 to 120 percent of AMI): 326 units (17 percent)
- Above Moderate Income (greater than 120 percent of AMI): 843 units (43 percent)

For this Housing Element planning period, January 31, 2023, through January 31, 2031, the City must ensure the availability of adequate residential sites to accommodate these units. This Appendix provides an overview of the methodology used to evaluate the adequacy of sites within

[1] Association of Bay Area Governments (ABAG) covers a nine-county region, including Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma.

Los Altos and identifies such sites for future residential development to fulfill the City's share of regional housing needs.

B.1.3 Data

The sites inventory analysis used data provided by the City, such as GIS data and building permit/entitlement information. The following is an overview of the data used:

- City and County-level parcel GIS data, including General Plan land use designation, zoning district, ownership, existing land use, improvement value, land value, age of building, etc.
- ADU building permits issued
- Entitled projects and projects in the entitlement phase
- Prior housing element site inventories
- Annual Progress Reports to HCD during the 5th Cycle
- Zoning Code allowed density

Section B.2 Future Residential Development Potential

B.2.1 Accessory Dwelling Units

New State laws in effect since January 1, 2018 have significantly eased the development standards and streamlined the approval process for Accessory Dwelling Units (ADUs). As a result, the City has experienced an increase in ADU applications and production in recent years. Table B-1 shows the number of building permits issued for ADUs in Los Altos in 2019 through 2021.

Table B-1: ADU Building Permits Issued (2019-2021)

Year	Permitted ADUs
2019	36
2020	23
2021	62
Total	**121**
Annual Average	**40.33**

From 2019 through 2021, the City issued an average of 40.33 ADU building permits per year. The City is estimating that ADUs will be produced at the same rate or greater throughout the eight-year planning period, resulting in 322 ADUs, even though the City will be conducting further efforts to facilitate ADU production (Program 2.D), described below.

The City has adopted an ADU Ordinance consistent with current State law and will facilitate ADU production through the preparation of standardized ADU building plans, the hiring of additional staff support for ministerial application reviews, and other efforts. Under Program 2.D, the City will publicize and promote the ADU standard plans through multiple outreach methods and languages. Furthermore, to increase ADU building permits, the City will promote the availability of funding for ADUs, including the CalHFA ADU Grant Program that provides up to $25,000 to reimburse homeowners for predevelopment costs necessary to build and occupy an ADU. Furthermore, the City will monitor ADU production and affordability throughout the planning period and implement additional action if target ADU numbers are not being met.

ABAG conducted a regional ADU affordability analysis to provide local governments in the region with assumptions for ADU affordability that can be used to assign projected ADUs to income categories. The ADU affordability assumptions identified in the preliminary ABAG analysis for communities with affirmatively furthering fair housing concerns were applied to ADUs projected over the planning period in Table B-2.

Table B-2: Affordability per ABAG ADU Survey

Income Level	Percent	ADU Projections
Very Low	5%	16
Low	30%	97
Moderate	50%	161
Above Moderate	15%	48
	Total	**322**
Source: ABAG, City of Los Altos		

B.2.2 Entitled and Proposed Developments

Because the RHNA projection period for the 2023-2031 Housing Element begins on June 30, 2022, housing developments that have already been proposed or received entitlement and were not issued a certificate of occupancy by June 30, 2022, but are expected to be completed before the end of the planning period (January 31, 2031), can be credited toward the RHNA. Table B-3 lists those projects that meet those criteria and can be credited toward the 6th Cycle RHNA. No entitled or proposed developments are dependent on an infrastructure schedule that would result in construction after January 2031. Furthermore, the City's Municipal Code does not result in the automatic expiration of projects (i.e., in the case that insignificant progress is made towards meeting conditions of approval by a certain timeframe).

Table B-3: Entitled and Proposed Developments

Address	Status	Vacant/ Existing or Previous Use	Existing/ Previous ILV*	Existing/ Previous Building Age*	Units by Income Level[1]				
					Very Low	Low	Moderate	Above Moderate	Total Net New[2]
962 Acacia	Under construction	Vacant	N/A	N/A	-	-	-	2	2
385/389 First St.	Under construction	Commercial	1.19	1955/1980	-	-	1	9	10
425 First St.	Under construction	Office	N/A	1975	-	1	2	17	20
444-450 First St.	Under construction	Office	N/A	N/A	-	1	3	23	27
140 Lyell	Under construction	Single-Family Home	0.69	1951	-	1	-	4	4
330 Distel Circle	Approved (approved Sept 2022)	Office – vacant, no tenants	N/A	1975	-	90	-	-	90
4350 El Camino Real	Approved (approved Sept 2022)	Commercial (gas station and convenience mart) – fully occupied	0.26	1969	3	-	4	40	47
4848-4856 El Camino Real	Approved, building permit ready to issue	Commercial – vacant, no tenants	0.02	2020	-	7	3	42	52
4898 El Camino Real	Approved, in building permit plan check	Commercial – vacant, no tenants	0.81	1959	-	4	2	22	28
5150 El Camino Real	Approved, in building permit plan check	Office – vacant, no tenants	0.02	N/A	-	16	12	168	196
355/365/371/373 First St.	Approved (approved June 2022)	Commercial – partially occupied	0.62/0.28/0.11/ 0.97	1991/1938/ 1946/1963	3	-	4	43	49
376 First St.	Approved (approved April 2022)	Commercial (restaurant) – fully occupied	1.26	1954	-	-	3	12	15

Table B-3: Entitled and Proposed Developments

Address	Status	Vacant/ Existing or Previous Use	Existing/ Previous ILV*	Existing/ Previous Building Age*	Units by Income Level[1]				
					Very Low	Low	Moderate	Above Moderate	Total Net New[2]
440 First St.	Approved (approved early 2022)	Office – vacant, no tenants	N/A	1980	-	-	-	4	4
343 Main St.	Approved	Commercial (home improvement) – fully occupied	0.29	1938	-	-	-	1	1
95 First St.	Under review, approval anticipated summer 2023	Office – partially occupied	0.58	1979	-	3	-	12	15
349 First St.	Under review, approval anticipated summer 2023	Office – vacant, no tenants	0.12	1960	-	-	2	10	12
14 Fourth St.	Under review/deemed complete, approval anticipated by summer 2023	Single-Family Home – short term lease expires 2023	0.30	1952	-	-	-	4	3
996 Loraine	Under review, approval anticipated by March 2023	Commercial – vacant, no tenants	0.54	1965	-	-	2	10	12
				Subtotal Gross	**6**	**123**	**38**	**423**	**N/A**
				Subtotal Net New	**6**	**123**	**38**	**420**	**587**

** Some pre-development improvement to land value (ILV) and building age data may be unavailable due to the stage of development/construction. ILV is calculated using Santa Clara County Assessor data for improvement value and land value. Building age is the "effective year built" identified in Santa Clara County Assessor data.*

[1] Any low or moderate units are or will be deed restricted to the identified income level.

[2] Certain projects are located on parcels with existing residential units where the existing residential units will be demolished for a project with a larger number of units. All existing units that will be demolished are market rate units; no units to be demolished are subject to a recorded covenant, ordinance, or law that restricts rent levels to affordable to low-income households or subject to any other form of rent or price control by the City. Only the net new number of units are counted toward the RHNA.

Source: City of Los Altos, Santa Clara County Assessor

Entitled and proposed developments would result in 587 net new units, and most of these projects provide above moderate housing units.

B.2.3 Assumptions

Density

Table B-4 summarizes density for residential and mixed-use zones that allow residential. Los Altos does not have any minimum density standards in any of the following zones.

Table B-4: Density for Zones that Allow Residential

Zone[1]	Dwelling Units Per Acre
R1-40	Max. 1.1 units/acre
R1-20	Max. 2.2 units/acre
R1-H	
R1-10	Max. 4.4 units/acre
R3-5	Max. 8.7 units/acre
R3-4.5	Max. 9.7 units/acre
R3-3	Max 14.5 units/acre
R3-1.8	Max 24.2 units/acre
R3-1	Max 38 units/acre
C-T	
CD/R3	No maximum density
CN	
CD	
CRS	
CRS/OAD	

[1] Per discussions with the City, all Planned Community (PC) and Planned Unit Development (PUD) zoned parcels are built out unless otherwise noted in this Appendix.

Source: City of Los Altos Zoning Code

Realistic Capacity and Development Trends

Table B-5 summarizes assumptions for realistic residential development capacity based on recent development trends from in process, approved, entitled, and/or permitted projects within Los Altos. Although there are instances in which sites are developing at above 70 percent maximum allowed density (e.g., in the R3-1.8 District), and even more than 100 percent of maximum allowed density in the CT District, the analysis conservatively assumed no parcel would develop at greater than

70 percent maximum capacity (in the CT District, the analysis assumed development at 80 percent maximum capacity, which is still conservative relative to CT District development trends). To continue to facilitate housing in the CT District, the City will increase or remove the density maximum allowed in the CT District (Program 1.B).

Although there are no recent development trends in the CD or CRS/OAD districts, a capacity assumption of 14 units per acre was applied. The CRS development trend of 20 units per acre reflects only one project and represents the low end of the density range for multi-family residential projects the City is receiving applications for throughout mixed-use districts; this Appendix conservatively applies 70 percent of 20 units per acre (14 units per acre) to housing sites in the CD and CRS/OAD districts. Additionally, various programs will remove constraints to increase housing development in these zones (see Appendix C, Housing Constraints and programs under Goal 3).

Table B-5: Zones Realistic Residential Development Capacity Assumptions

Zone[1]	Projects In Process, Approved, Entitled, and/or Permitted	Average Development Trends Capacity	Realistic Capacity Assumption[2]
R1-H	None	N/A	70% of maximum allowed density (1.5 units/acre)
R1-10	None	N/A	70% of maximum allowed density (3.1 units/acre)
R3-1.8	- 140 Lyell (20 units/acre; mixed income	20 units/acre (83% of maximum allowed density)	70% of maximum allowed density (16.9 units/acre)
R3-1	- 14 Fourth St. (25 units/acre; above moderate income)*	25 units/acre (66% of maximum allowed density)	70% of average development trends (17.5 units/acre)
CT	- 4848-4856 El Camino Real (71 units/acre; mixed income) - 4898 El Camino Real (65 units per acre; mixed income) - 330 Distel Circle (108 units/acre; low income) - 5150 El Camino Real (52 units/acre; mixed income) - 4350 El Camino Real (72 units/acre; mixed income)	74 units/acre (194% of maximum allowed density)	80% of maximum allowed density (30.4 units/acre) (41% of average development trends)[3]
CD/R3	- 349 First St. (75 units/acre; mixed income)* - 444-450 First St. (77 units/acre; mixed income) - 425 First St. (74 units/acre; mixed income) - 385/389 First St. (45 units/acre; mixed income) - 355, 365, 371, 373 First St. (81 units/acre; mixed income)	62 units/acre	70% of average development trends (43.4 units/acre)

Table B-5: Zones Realistic Residential Development Capacity Assumptions

Zone[1]	Projects In Process, Approved, Entitled, and/or Permitted	Average Development Trends Capacity	Realistic Capacity Assumption[2]
	- 440 First St. (31 units/acre; above moderate income) - 376 First St. (75 units/acre; mixed income) - 95 First St. (34 units/acre; mixed income)*		
CN	- 962 Acacia (18 units/acre; above moderate income) - 996 Loraine Ave. (60 units/acre; mixed income)*	39 units/acre	70% of average development trends (27.3 units/acre)
CD	None	N/A	14 units/acre
CRS	- 343 Main St. (20 units/acre; above moderate income)	20 units/acre	70% of average development trends (14 units/acre)
CRS/OAD	None	N/A	14 units/acre

Note: See Table B-3 for detailed breakdown of project affordability levels.

* Projects are in the entitlement phase/under review.

[1] No sites are located in the R1-40, R1-20, R3-5, R3-4.5, R3-3, R3-1.8, or R3-1 zoning districts.

[2] Realistic capacity was reduced on certain sites based on constraints (e.g., topography, etc.). For example, 2100 Woods Lane (APNs 34204089 and 34204078) has a maximum capacity of 40 total units, but 11 units are identified for realistic capacity.

[3] With implementation of the upzoning described in Program 1.B, the sites inventory analysis assumes a realistic capacity for rezoned CT sites at 40 dwelling units per acre (54 percent of average development trends in the CT District).

Source: City of Los Altos, LWC

From 2015 to 2021, Los Altos received 18 applications for development within its mixed-use zones (on average three development applications annually). None (zero percent) of these 18 applications over six years proposed 100 percent commercial uses (all included residential units). This demonstrates strong market demand for residential uses within these zones.

Furthermore, with the declining trend of brick-and-mortar retail/commercial coupled with COVID-19 pandemic impacts (e.g., the increasing prevalence of working from home, etc.) and continued demand for housing, the likelihood of 100 percent commercial projects is not expected to increase in the near future. The realistic capacity assumptions for mixed-use zones identified in Table B-5 are conservative, reflecting lower densities than demonstrated trends. For instance, the 330 Distel project approved in September 2022 is entitled for 90 lower-income housing units with no commercial uses in the CT District. This site is 0.83 acres, and the approved density is 108 dwelling units per acre, constituting 285 percent of maximum allowed density (38 units per acre). On average, projects in the CT District are being proposed at 74 dwelling units per acre, or 194 percent of maximum density (see Table B-5). Despite these trends, and as shown in Table B-5, given implementation of upzoning in the CT District described by Program 1.B, the City is only projecting 40 dwelling units per acre as the realistic capacity assumption for development at sites in the CT District. This conservative capacity projection reflects 54 percent of average development trends in the CT District.

Additionally, the Housing Element includes several rezone programs to allow housing in other commercial or public use zones (e.g., the OA and PCF zoning districts), creating additional mixed-use zones at specified rezone sites (see Programs 1.C and 1.D).[2] While these programs propose a maximum density of 30 dwelling units per acre, and therefore are identified as having capacity for lower-income units, the sites inventory analysis conservatively assumes realistic capacity at the minimum proposed density of 20 dwelling units per acre, a capacity assumption of 66.7 percent. This is lower than current development trends in existing mixed-use zoning districts. In addition to providing new areas of the city where housing will be allowed, various programs will remove constraints and facilitate housing development in mixed-use zones, such as modifying parking requirements (Program 3.A), increasing allowed building heights (Program 3.B), removing site-specific FAR restrictions (Program 3.C), streamlining design review procedures (Program 3.H), incentivizing Downtown lot consolidation (Program 1.I), and taking action to move forward with developing housing on City parking plazas (Program 1.H).

Projects that are below maximum density are constrained by various factors, including but not limited the City's parking requirements. As discussed in Appendix C, the zoning standards for parking citywide will be evaluated and modified together with strategies for Downtown parking management and modifications to the existing standards adopted to facilitate housing production (Program 3.A).

B.2.4 Methodology

To create the adequate sites inventory, the City developed a comprehensive, iterative methodology to screen parcels for near-term development. The methodology is comprised of several phases described below.

Phase 1.A: Vacant Residential Parcels

First, the City identified all vacant residentially-zoned parcels. Parcels were determined to be vacant if they had an assessed land improvement value of zero and confirmed to be vacant given available aerial imagery.

Phase 1.B: Nonvacant, Mixed-Use Parcels

Since Los Altos is generally built out and does not have much available vacant land, nonvacant sites will comprise a substantial portion of the sites inventory. Commercial and mixed-use zoned parcels that allow residential uses were analyzed for redevelopment potential using a ratio of improvement value to land value. The relationship of improvement value to land value is a widely accepted indicator of property utilization and whether redevelopment potential exists; however,

[2] There are only two sites zoned PCF that the City is rezoning under Program 1.D to allow for housing: APNs 33609023 and 33609018. In its realistic capacity projections for these sites, the City only considered portions of the areas currently used as surface parking to accommodate housing, anticipating that the sites will continue to operate their existing uses.

this metric is important to supplement with other data to confirm viability of redevelopment. Land and the improvement values were identified based on Santa Clara County Assessor property tax assessment values.

The following was performed on a parcel basis to determine potential as a site:

1. Divide roll improvement value by roll land value, yielding an Improvement to Land Value Ratio (I:L Ratio).
2. Parcels with an I:L Ratio below 1.0 were considered a potential site.[3]
3. Building(s) (if any) was built in 1980 or earlier (and therefore over 40 years of age).

In addition to improvement to land value and age of building(s) (if any), nonvacant sites were further screened (see Phase 2), underwent a site-by-site assessment (see Phase 4), and were analyzed relative to existing uses (see B.2.5, Suitability of Nonvacant Sites).

Phase 2: Screening

Parcels that passed through Phase 1 were then screened using the criteria below:

1. The parcel does not have a current entitlement and is not under review (i.e., not included in Table B-3)
2. Current use type is not a park, utility, school, other public use with no redevelopment potential (as specified in HCD guidance) or single-family or multi-family residential use
3. The parcel is not subject to a Mills Act contract (i.e., historic property)

Phase 3: Categorization

Eligible parcels were assessed to determine which income levels they can accommodate. Each parcel was determined to be able to accommodate a specific income category given its maximum allowable density standards. The lower income category threshold is consistent with the default density for Los Altos pursuant to Government Code §65583.2.

Table B-6: Income Levels by Density

Density Allowed by Zone	Income Level
< 20 dwelling units/acre	Above moderate
20 – 29 dwelling units/acre	Moderate
≥ 30 dwelling units/acre	Lower
Source: HCD, LWC	

[3] The Institute of Urban and Regional Development (IURD) at the University of California, Berkeley suggests that an I:L Ratio of below 1.0 is an appropriate factor to facilitate identification of underutilized commercial properties.

For zones with no maximum density, current development trends were used to inform income level categorization. Per Government Code Sections 65583.2(c)(2)(A) and (B), sites accommodating lower-income housing should be between 0.5 and 10 acres. All sites originally considered for lower income housing capacity but whose lot size is smaller than 0.5 or larger than 10 acres were categorized for moderate income housing capacity, except that sites smaller than 0.25 acres were categorized for above moderate housing capacity.

Phase 4: Site-by-Site Assessment

Despite the screening analysis, some potential sites had existing development or other conditions (e.g., irregular shape, accessibility issues/landlocked, etc.) that preclude them from the site inventory. The analysis included a site-by-site assessment and refinement of sites depending on additional information from direct observation or firsthand experience from City staff. Furthermore, some sites that were screened out of the results (e.g., certain parcels along El Camino Real and in Downtown that had an I:L ratio greater than 1.0 or buildings built after 1980, etc.) were determined to be suitable housing sites based on property owner or developer interest. Those sites were added to the inventory with the appropriate income categorization.

This analysis included an evaluation of environmental and infrastructure constraints, which are described in Appendix C, Section C.4. The 2100 Woods Lane (APNs 34204089 and 34204078) site has a maximum capacity of 40 total units, but 11 units are identified for realistic capacity due to topography and other potential factors that could constraint development capacity. Further adjustments to realistic capacity were reflected based on partial retention or replacement of existing religious and commercial uses, including reduced capacity projections for the PCF rezone sites, the five-acre Woodland Plaza along Grant Road, and the six-acre Rancho Shopping Center along Foothill Expressway. Other environmental constraints, such as those described in Appendix C, do not pose significant environmental constraints to housing. According to the environmental analysis prepared for the Housing Element, “wildfire hazards are not a major concern in the [C]ity… and [n]o part of Los Altos is located within an identified earthquake fault zone as delineated on the Alquist-Priolo Earthquake Fault Zoning Map.” All identified sites have access to infrastructure and utilities.

In addition to the improvement to land value (I:L) ratio screening described in Phase 1.B, the City analyzed potential sites to determine if existing uses would constitute an impediment to residential development. For example, parcels owned and operated by the California Water Service Company and parcels affected by the maximum dwelling unit limit in the Loyola Corners Specific Plan that had passed initial screening were identified as having impediments to residential development and were removed from the sites list. Development trends (see Table B-5) on nonvacant sites were considered in the determination of sites. Market conditions in Los Altos are demonstrating viability of nonvacant site redevelopment for both residential and mixed-use projects as shown by current development trends. See Section B.2.5 for additional discussion on suitability of nonvacant sites.

Phase 5: Parcels in Prior Housing Elements

Vacant parcels from both the 4th and 5th Cycles and non-vacant parcels from the 5th Cycle can be reused in this Housing Element (the 6th Cycle) to accommodate lower-income housing, but they must be rezoned to allow projects with at least 20 percent of the units affordable to lower income households to be by-right. Figures B-1, B-2, B-3, and B-4 and Table B-10 show 6th Cycle sites and any site previously identified as a site in the 5th Cycle. A program is included to rezone reused sites identified for lower income consistent with AB 1397.

Phase 6: Rezone Sites Selection

The preliminary evaluation of existing residential capacity showed the need to identify additional sites to accommodate the RHNA. The City solicited ideas from staff, elected and appointed officials, and the public (including interested property owners) in order to identify potential rezoning measures and rezone sites to accommodate the RHNA. The potential rezone areas/parcels and associated evaluation were presented and discussed at the Planning Commission and City Council. The City Council considered input from the public and Commission before approving the rezone areas/parcels for inclusion in the Housing Element. Based on this direction, this Housing Element includes Programs 1.B, 1.C, 1.D, 1.E, and 1.F to upzone certain mixed-use districts (e.g., the CT District), allow housing in zoning districts that do not currently allow housing (at selected OA and PCF-zoned sites), remove constraining development standards in Loyola Corners, and rezone the Village Court parcel to CT.

B.2.5 Suitability of Nonvacant Sites

Since Los Altos is generally built out, the sites inventory is comprised largely of nonvacant sites. Nonvacant sites are relied on to accommodate more than 50 percent of the City's lower income RHNA; therefore, pursuant to Government Code §65583.2(g)(2), the City also analyzed whether substantial evidence exists to support that existing uses on identified lower income sites will be discontinued during the planning period (2023-2031). To this effect, the resolution adopting the Housing Element will include findings based on substantial evidence (and described more generally below) that the existing uses on identified nonvacant sites are not an impediment to residential development and/or will likely discontinue during the planning period.

Nonvacant parcels included as sites are underutilized with primarily surface parking and commercial buildings where the existing uses are of lower economic viability, substantial opportunity is physically present for additional development, and/or the structures are at or near the end of their useful life. This includes sites with structures (if any) that were built before 1980 (over 42 years old) and the parcel has a low improvement to land value (i.e., below 1.0). The declining trend of brick-and-mortar retail coupled with COVID-19 pandemic impacts has dramatically impacted the viability of many commercial uses—as demonstrated in Table B-3, even several fully-occupied commercial properties and properties with other low-intensity uses are

being converted into multi-family and residential mixed-use projects in Los Altos. These conversions are occurring based on the strong demand for housing and lack of vacant land.

One example is the Foothill Crossing Shopping Center (Foothill Crossing; APNs 32601052 and 32601053; 22350 and 22310 Homestead Road), a strip commercial center in Los Altos that contains surface parking lots. Although Foothill Crossing is regularly frequented by customers and appears to be functioning relatively successfully as a commercial site, an interested applicant recently expressed to the City desire to redevelop Foothill Crossing as a mixed-use site with high-density residential and commercial uses. In addition to proposing housing and new retail, the current conceptual plan preserves key existing retail uses (e.g., Trader Joe's). Foothill Crossing has Improvement-to-Land Value ratios of 0.27 and 0.61 respectively and was constructed in the late 1960s to early 1970s.

In addition to Foothill Crossing, other large commercial centers in Los Altos have been discussed as redevelopment opportunities for housing or mixed-use, including the Rancho Shopping Center (APN 18956014; 600 Foothill Expressway). Rancho Shopping Center has an Improvement-to-Land Value ratio of 0.59 and was built prior to 1980, consistent with the methodology used for identifying other nonvacant sites.[4] This Housing Element further facilitates development of the Rancho Shopping Center and other commercial centers (i.e., Woodland Plaza) by removing the floor-to-area ratio (FAR) restriction through Program 3.C.[5] Foothill Crossing, Rancho Shopping Center, and parts of Woodland Plaza are all identified as lower income housing sites. They have similar characteristics to many of the other lower income sites, including:

- Improvement-to-Land Value ratios less than 1.0
- Multi-tenant commercial uses
- Partial occupancy and vacancies, in the case of Foothill Crossing and Rancho Shopping Center

Development trends demonstrate the intensification of underutilized commercial properties into multi-family and high-density residential mixed-use projects. Table B-5 identifies recent development projects and shows average density trends in both residential and mixed-use zones; most of these projects are on nonvacant sites. Existing uses on pipeline project parcels include the following:

- Office buildings
- Commercial buildings (including vacant, partially occupied, and fully occupied)

[4] See Section B.2.4. These are the same screening criteria used for identifying the lower-income nonvacant sites in Table B-7, who were also subject to the income categorization described in Section B.2.4

[5] Woodland Plaza (APNs 31816022, 31816020, 31816019, 31816015) has Improvement-to-Land Value ratios of 0.37, 0.07, 0.46, 0.22, respectively.

- Restaurants
- Gas station and convenience mart
- Single-family homes

Redevelopment of sites with similar conditions to the identified sites is occurring in Los Altos, and recent applications and entitlements consist of residential mixed-use or residential-only projects in all cases. Additionally, nonvacant parcels with development entitled or proposed (Table B-3) have similar characteristics as proposed housing sites, including structure age generally ranging from 1938 to 1980 and improvement to land value ratios below 1.0. Most identified nonvacant sites have improvement to land value ratios below 0.92.

Additionally, potential long-term impacts on how office space will be utilized with the shift to remote work during the COVID-19 pandemic were considered. Identified sites, including those with existing office uses, consist of older buildings with low improvement values where higher intensity residential mixed-use is, or will be, allowed. Moreover, the sites inventory also includes several City-owned parking lots, which, as identified in the Downtown Vision Plan, are opportunity sites that can accommodate new (and in some cases affordable) housing. Program 1.H addresses how the City will facilitate housing on City-owned sites consistent with Surplus Land Act requirements.

Other existing uses on nonvacant sites include low intensity uses. Specifically, church sites have been included based on the screening criteria detailed in Section B.2.4 and City first-hand knowledge. To this effect, AB 1851, approved by the Governor in 2020, facilitates the provision of housing on religious institution property. AB 1851 prohibits cities from requiring the replacement of parking spaces lost due to the construction of housing units, eliminating up to 50 percent of the required number of spaces (Government Code §65913.6). Program 1.D has been included for the City to conduct outreach to religious institution property owners and operators to inform them of AB 1851 and other applicable regulations that encourage housing development.

The screening for potential sites considered these trends and utilized conservative assumptions in projecting units well below observed densities for residential and mixed-use projects. Lastly, the City is unaware of any leases that would perpetuate existing uses or prevent the development of housing on nonvacant sites during the planning period. During development and public review of the Draft Housing Element, no additional lease information was found to preclude identified housing sites from the inventory.

The following table lists the existing uses on lower income sites, including potential sites for rezoning. These existing uses are not considered to be an impediment to the development of housing during the planning period (2023-2031) based on development trends, market conditions, and redevelopment potential (e.g., building age, property condition, improvement-to-land-value ratio, existing use, etc.). Many lower income sites are surface parking lots with underutilized and/or underperforming multi-tenant commercial uses or offices (similar to the existing or previous uses at sites containing proposed and entitled projects identified in Table B-3) where significant development intensity can be achieved. As shown in Table B-7, owner interest in property

redevelopment for housing has been indicated for several nonvacant lower income sites. As evidenced by interest in projects such as the possible redevelopment of Foothill Crossing as a mixed-use site and entitlement of 330 Distel Circle for affordable housing described above, there is development pressure in Los Altos and throughout the Bay Area for multi-tenant commercial and office uses to convert to housing, including the conversion of unoccupied, partially-occupied, or even well-functioning commercial or office uses (e.g., Foothill Crossing Shopping Center discussed above). Several uses identified in Table B-7 (e.g., multi-tenant commercial, including restaurants, offices) are uses currently being redeveloped into housing as shown in Table B-3.

Moreover, as shown below, many lower-income sites are located along or near major thoroughfares such as El Camino Real and are zoned CT (also mirroring sites in Table B-3 that are redeveloping for housing). As described in Section B.2.3 and in Table B-5, projects in the CT District are being proposed on average at 74 dwelling units per acre, approximately 194 percent of maximum density, further indicating strong residential demand at these and at similar parcels.

Parcels along other key thoroughfares such as Foothill Expressway and San Antonio Road (especially OA-zoned site near Downtown Los Altos) could also accommodate similar pent-up demand in areas where residential is not currently allowed.

Table B-7: Existing Uses on Nonvacant Lower Income Sites and Potential Sites for Rezoning for Lower Income

Address	APN	Zone	Parcel Size (acres)	Existing Use
1188 LOS ALTOS AVE	16710094*	CT	0.51	Commercial and surface parking
EL CAMINO REAL	17003084*	CT	0.54	Surface parking lot
4844 EL CAMINO REAL	17002023*	CT	0.55	Retail store (candy shop) and surface parking lot
4500 EL CAMINO REAL	16712045*	CT	0.56	Multi-tenant (personal services - massage, hair studio, fencing club) and surface parking lot
5000 EL CAMINO REAL	17004050*	CT	0.62	Carl's Jr. and surface parking lot[1]
4906 EL CAMINO REAL	17003077*	CT	0.69	Multi-tenant (medical, dental, and other offices) and surface parking lot[1]
2057 GRANT RD	31816020	CN	0.71	Multi-tenant (commercial – cleaning services) and surface parking lot
4970 EL CAMINO REAL	17064120*	CT	0.78	Multi-tenant offices and surface parking lot[1]
2111 GRANT RD	31816019	CN	0.88	**Portion of Woodland Plaza** Grocery store and surface parking lot
4988 EL CAMINO REAL	17064119*	CT	0.94	Partially occupied multi-tenant (tax and accounting services, other general offices) and surface parking lot[1]
4926 EL CAMINO REAL	17003073*	CT	1.05	Restaurant and surface parking lot

Table B-7: Existing Uses on Nonvacant Lower Income Sites and Potential Sites for Rezoning for Lower Income

Address	APN	Zone	Parcel Size (acres)	Existing Use
4546 X EL CAMINO REAL	16712047*	CT	1.68	**Portion of Village Court** Partially occupied multi-tenant (commercial, including restaurants, general and medical offices, insurance and financial institutions) and surface parking lot
22350 HOMESTEAD RD	32601052	CN	2.08	**Portion of Foothill Crossing** Partially occupied multi-tenant commercial and surface parking lot[1]
22310 HOMESTEAD RD	32601053	CN	2.94	**Portion of Foothill Crossing** Partially occupied multi-tenant commercial and surface parking lot[1]
2185 GRANT RD	31816022	CN	3.34	**Portion of Woodland Plaza** Grocery store and surface parking lot
600 FOOTHILL EX	18956014	CN	6.00	**Rancho Shopping Center** Partially occupied multi-tenant (coffee shop, postal services, exercise gym, restaurants, barbershop, real estate, beauty salon) and surface parking lot
895 SHERWOOD AV	17001055*	OA	0.56	Multi-tenant (massage and fitness studio) and surface parking lot
745 DISTEL DR	17004045*	OA	0.56	Multi-tenant (architecture and financial services offices)
289 S SAN ANTONIO RD	17041086*	OA	0.60	Multi-tenant (title company, financial services, pool and spa) and surface parking lot
901 FREMONT AV	18915106*	CN	0.70	Bank and surface parking lot
399 S SAN ANTONIO RD	17040082*	OA	0.76	Mortuary and surface parking lot
161 S SAN ANTONIO RD	17042028*	OA	0.90	Multi-tenant (real estate offices) and surface parking lot
211 S SAN ANTONIO RD	17041079*	OA	0.99	Bank and surface parking lot
1000 FREMONT AV	31801036*	CN	1.22	Partially occupied multi-tenant commercial and surface parking lot[1]
851 FREMONT AV	18914081*	OA	1.85	Partially occupied multi-tenant (medical offices) and surface parking lot
4546 EL CAMINO REAL[2]	16712042*	R1-10[1]	2.78	**Portion of Village Court Shopping Center** Partially occupied multi-tenant (general and medical offices, commercial services and retail, including massage, postal services, therapy) and surface parking lot[1]
655 MAGDALENA AV	33609023*	PCF	6.06	Los Altos United Methodist Church, preschool, and surface parking lot
625 MAGDALENA AV	33609018*	PCF	6.50	Bridges Community Church and surface parking lot

Table B-7: Existing Uses on Nonvacant Lower Income Sites and Potential Sites for Rezoning for Lower Income

Address	APN	Zone	Parcel Size (acres)	Existing Use
*These parcels are rezone sites. [1] Owner interest in property redevelopment for housing indicated. [2] APN 16712042 (4546 El Camino Real) would be rezoned CT under the rezoning program (Program 1.F), and therefore would accommodate lower income units. *Source: City of Los Altos, Santa Clara County Assessor, LWC*				

Furthermore, to encourage the redevelopment of nonvacant sites with higher-density residential uses, the City has multiple programs to provide financial assistance, incentives, and regulatory concessions to facilitate more intensive residential development. These include:

- Program 1.A: Rezone for RHNA Shortfall
- Program 1.B: Facilitate higher density housing in the Commercial Thoroughfare (CT) District
- Program 1.C: Allow housing in the Office Administrative (OA) District
- Program 1.D: Allow housing on certain Public and Community Facilities (PCF) District sites
- Program 1.E: Update the Loyola Corners Specific Plan
- Program 1.F: Rezone Village Court parcel
- Program 1.H: Facilitate housing on City-owned sites
- Program 1.I: Incentivize Downtown lot consolidation
- Program 1.N: Facilitate and monitor pipeline housing projects.
- Program 2.C: Assist in securing funding for affordable housing projects
- Program 3.A: Prepare a Downtown parking plan and update parking requirements
- Program 3.B: Modify building height in mixed-use zoning districts
- Program 3.C: Remove floor-to-area ratio (FAR) restriction at Rancho Shopping Center and Woodland Plaza

As described above, many of the housing sites have underutilized commercial spaces and/or low intensity uses which are anticipated to redevelop based on trends, market conditions, and interest expressed to City staff for redevelopment. Additionally, the City will take efforts to continue to encourage redevelopment of nonvacant sites through various programs. Therefore, considering development trends, declining demand for commercial spaces, and Housing Element programs,

nonvacant uses will not impede residential development and/or are likely to discontinue during the planning period.

Section B.3 Adequacy of Residential Sites in Meeting RHNA

B.3.1 Summary

The following table summarizes the City's methods for satisfying its RHNA (Table B-8). Based on ADU projections, entitled and proposed projects, and available sites, the City has excess capacity in moderate- and lower-income categories and a shortfall in the above moderate-income category.

Table B-8: Residential Development Potential and RHNA

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
RHNA	See Very Low	**501**	**288**	**326**	**843**	**1,958**
ADUs	See Very Low	16	97	161	48	322
Entitled/Proposed Projects[1]	-	6	123	38	420	587
Remaining RHNA	See Very Low	**479**	**68**	**127**	**375**	**1,049**
Site Inventory[1]	See Very Low/Low	557		168	323	1,048
Surplus / (Shortfall)	**See Very Low/Low**	**10**		**41**	**(52)**	**(1)**

[1] Considers net new units only.

Source: City of Los Altos, LWC

The City has identified potential parcels for rezoning to address the above moderate shortfall and provide additional lower and moderate-income housing capacity. If the potential candidate parcels are rezoned in accordance with programs under Goal 1, the City would have a surplus in all income categories as shown in Table B-9.

Table B-9: Residential Development Potential and RHNA – WITH REZONING

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
RHNA	See Very Low	**501**	**288**	**326**	**843**	**1,958**
ADUs	See Very Low	16	97	161	48	322
Entitled/Proposed Projects[1]	-	6	123	38	420	587
Remaining RHNA	See Very Low	**479**	**68**	**127**	**375**	**1,049**
Site Inventory[1]	See Very Low/Low	965		296	387	1,648
Surplus / (Shortfall)	**See Very Low/Low**	**418**		**169**	**12**	**599**

[1] Considers net new units only.

Source: City of Los Altos, LWC

AB 725 requires at least 25 percent of the above moderate income RHNA be met on sites that allow four or more units, and at least 25 percent of the moderate income RHNA be met on sites that allow four or more units, but not more than 100 units per acre. The City's sites inventory complies with these requirements.

B.3.2 Housing Sites Map

The following maps (Figures B-1, B-2, B-3, and B-4) show the inventory of sites by income category. Sites that were also included in the 5th Cycle Housing Element are identified with a bold border. Additional sites maps are included in Appendix F (Affirmatively Furthering Fair Housing), Section F.3.

Figure B-1: 6th Cycle Housing Element Site Inventory Map by Income Category (Northern Portion of Los Altos)

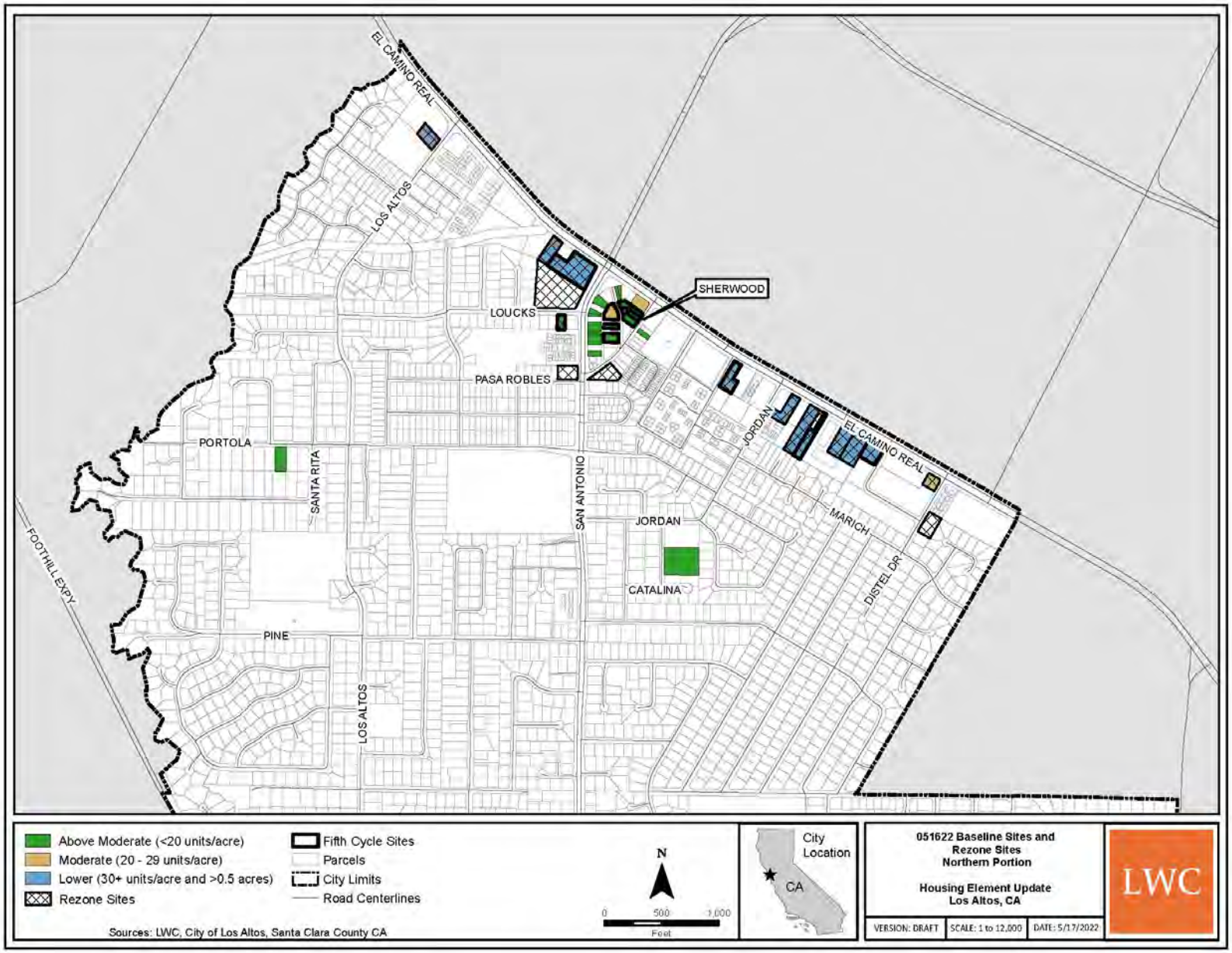


Figure B-2: 6th Cycle Housing Element Site Inventory Map by Income Category (North-Central Portion of Los Altos)

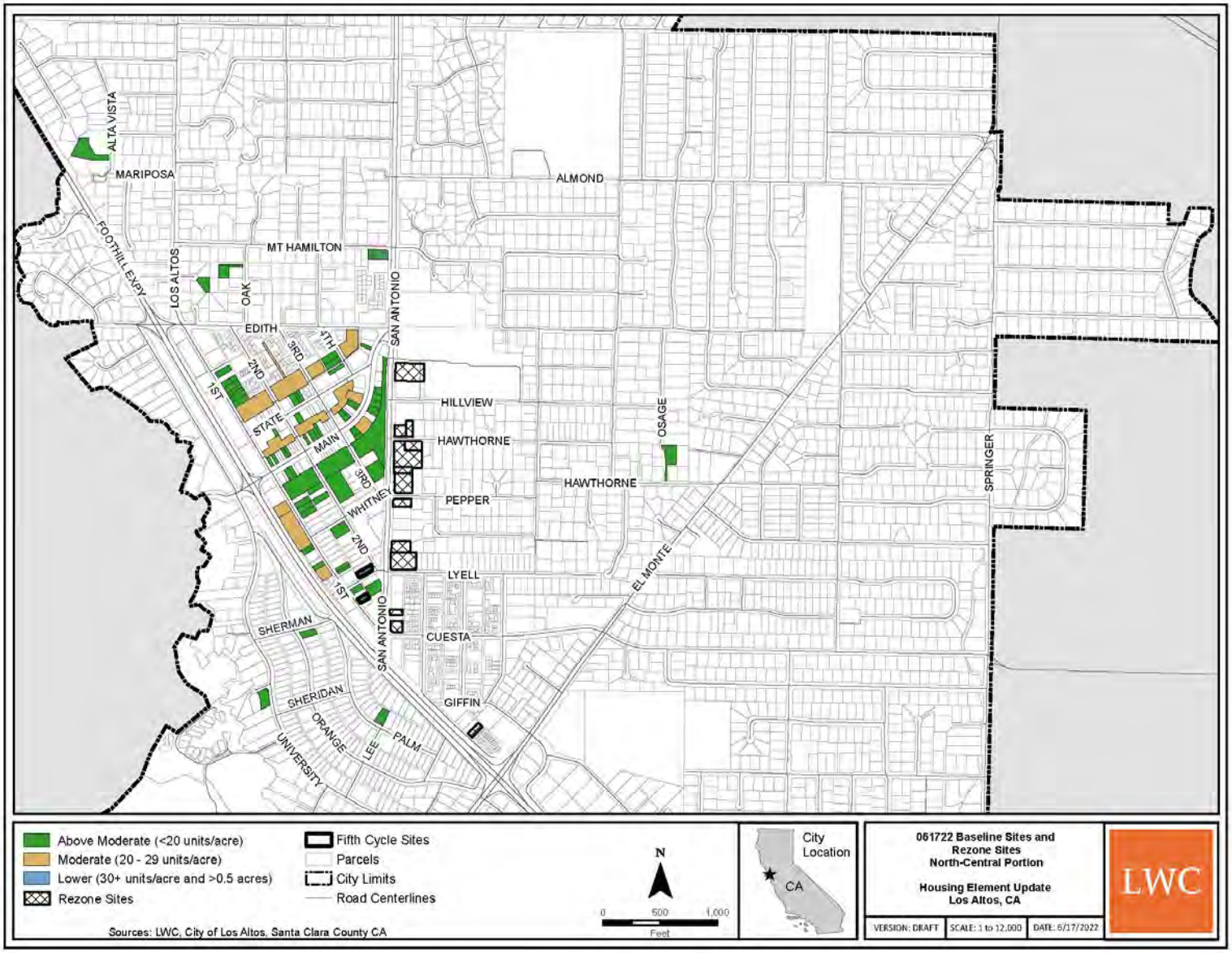


Figure B-3: 6th Cycle Housing Element Site Inventory Map by Income Category (South-Central Portion of Los Altos)

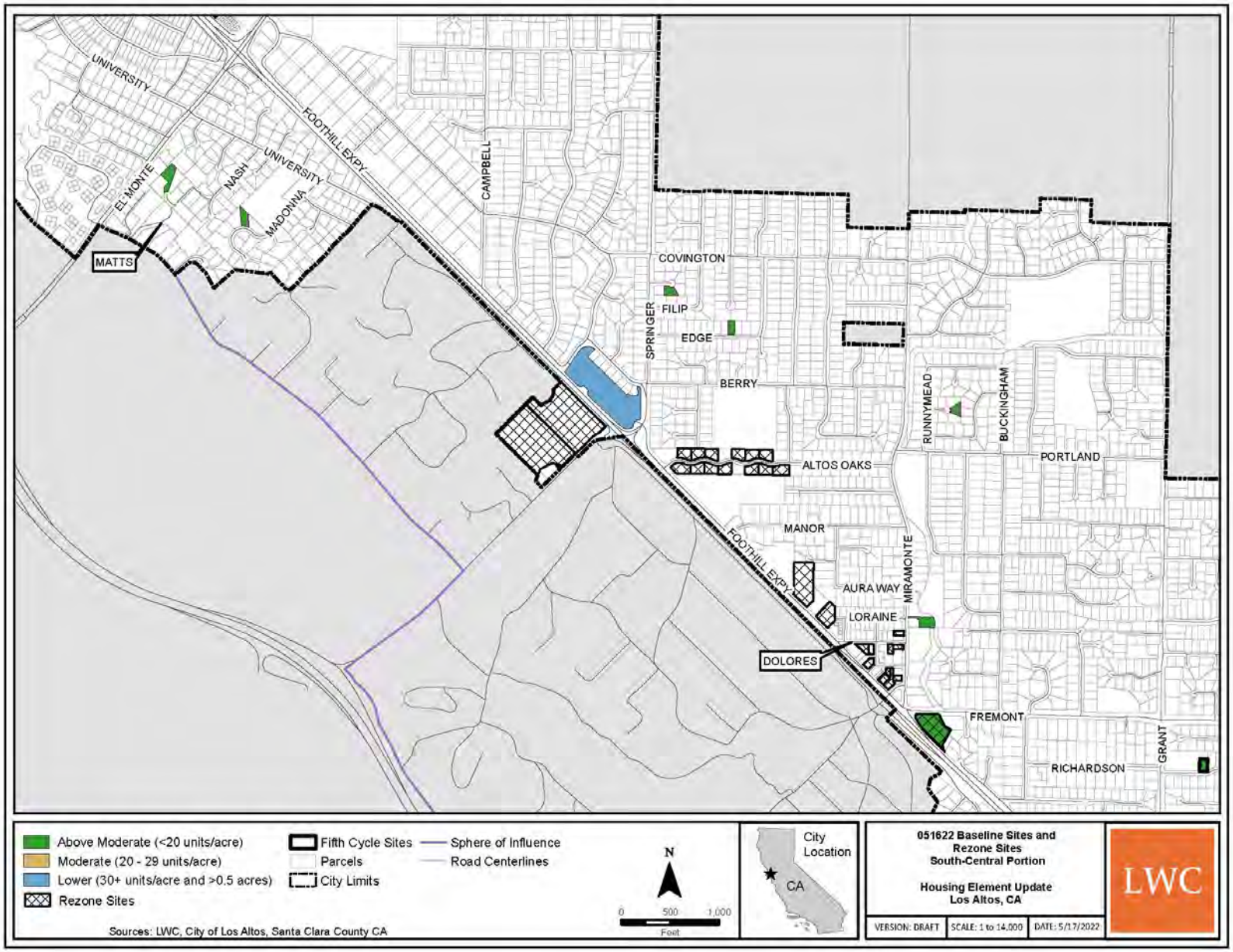
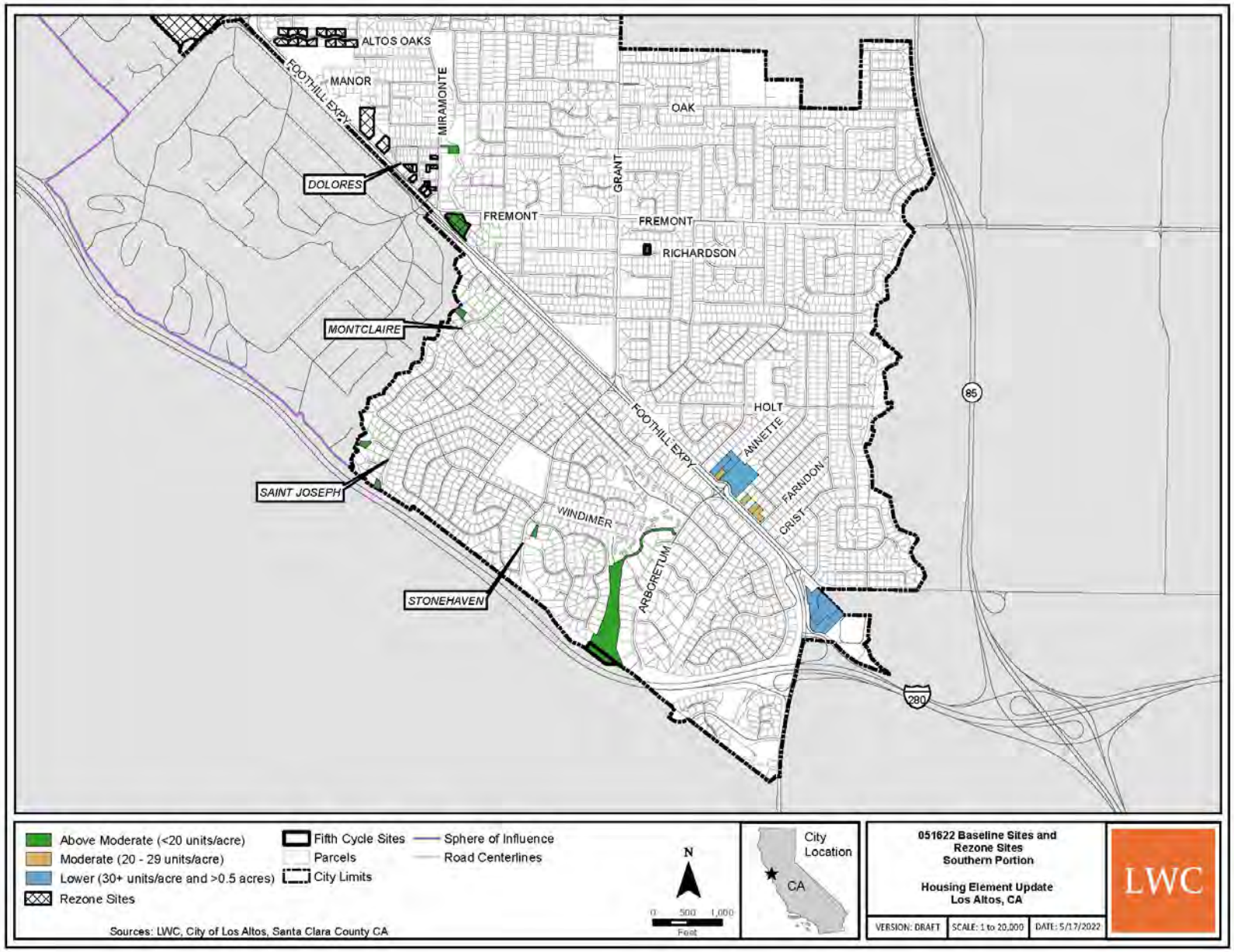


Figure B-4: 6th Cycle Housing Element Site Inventory Map by Income Category (Southern Portion of Los Altos)



B.3.3 Housing Sites Table

Table B-10 lists the parcels in the City's housing sites inventory with unit capacity by income category.

Table B-11 lists all of the rezone parcels with unit capacity by income category.

Table B-10: Housing Sites (Under Existing Zoning)

Address	APN	Zoning	General Plan[1]	Parcel Size	Existing Use	Year Built[2]	ILV[3]	5th Cycle Site[4]	Income Category	Units (Max)	Units (Realistic, Net)
1188 LOS ALTOS AV	16710094	CT	Thoroughfare Commercial	0.51	Commercial and surface parking	1956	1.15	No	Lower	19	16
EL CAMINO REAL	17003084	CT	Thoroughfare Commercial	0.54	Surface parking lot	0	0.00	Yes	Lower	21	16
4844 EL CAMINO REAL	17002023	CT	Thoroughfare Commercial	0.55	Individual Retail Stores	0	1.57	Yes	Lower	21	17
4500 EL CAMINO REAL	16712045	CT	Thoroughfare Commercial	0.56	Multiple or Strip Stores	1976	1.73	No	Lower	21	17
5000 EL CAMINO REAL	17004050	CT	Thoroughfare Commercial	0.62	Fast Food Eatery	1974	0.11	Yes	Lower	24	19
4906 EL CAMINO REAL	17003077	CT	Thoroughfare Commercial	0.69	Medical, Dental, Veterinary	1984	1.16	No	Lower	26	21
2057 GRANT RD	31816020	CN	Neighborhood Commercial	0.71	Multi-tenant (commercial – cleaning services) and surface parking lot	1959	0.07	No	Lower	28	14
4970 EL CAMINO REAL	17064120	CT	Thoroughfare Commercial	0.78	General Office	1985	0.17	No	Lower	30	24
2111 GRANT RD	31816019	CN	Neighborhood Commercial	0.88	Portion of Woodland Plaza; Grocery store and surface parking lot	0	0.46	No	Lower	34	14
4988 EL CAMINO REAL	17064119	CT	Thoroughfare Commercial	0.94	General Office	1981	0.13	No	Lower	36	29
4926 EL CAMINO REAL	17003073	CT	Thoroughfare Commercial	1.05	Restaurant and surface parking lot	1968	0.05	No	Lower	40	32
4546 X EL CAMINO REAL	16712047	CT	Thoroughfare Commercial	1.69	Commercial building and surface parking lot	1964	0.00	Yes	Lower	64	51
22350 HOMESTEAD RD	32601052	CN	Neighborhood Commercial	2.08	Portion of Foothill Crossing; Partially occupied multi-tenant commercial and surface parking lot	1969	0.27	No	Lower	81	57
22310 HOMESTEAD RD	32601053	CN	Neighborhood Commercial	2.94	Portion of Foothill Crossing; Partially occupied multi-tenant commercial and surface parking lot	1973	0.61	No	Lower	115	80
2185 GRANT RD	31816022	CN	Neighborhood Commercial	3.34	Portion of Woodland Plaza; Grocery store and surface parking lot	1997	0.37	No	Lower	130	68
600 FOOTHILL EX	18956014	CN	Neighborhood Commercial	6.07	Rancho Shopping Center; Partially occupied multi-tenant (coffee shop, postal services, exercise gym, restaurants, barbershop, real estate, beauty salon) and surface parking lot	1900	0.59	No	Lower	237	82
									Total - Lower		**557**

Table B-10: Housing Sites (Under Existing Zoning, Continued)

Address	APN	Zoning	General Plan[1]	Parcel Size	Existing Use	Year Built[2]	ILV[3]	5th Cycle Site[4]	Income Category	Units (Max)	Units (Realistic, Net)
392 1ST ST	16741007	CD/R3	Downtown Commercial	0.26	Offices or commercial with surface parking	1958	0.50	No	Moderate	16	11
146 MAIN ST	16738020	CRS	Downtown Commercial	0.28	Large building	0	0.92	No	Moderate	6	4
342 1ST ST	16741065	CRS	Downtown Commercial	0.29	Surface parking lot	0	0.05	No	Moderate	6	4
4646 EL CAMINO REAL	17001088	CN	Thoroughfare Commercial	0.29	Offices or commercial and surface parking lot	1958	0.47	No	Moderate	11	8
2235 GRANT RD	31816011	CN	Neighborhood Commercial	0.30	Offices or commercial and surface parking lot	1961	0.10	No	Moderate	12	8
169 MAIN ST	16738008	CRS	Downtown Commercial	0.30	Multiple or Strip Stores	1952	0.86	No	Moderate	6	4
994 ACACIA AV	17001047	CN	Thoroughfare Commercial	0.31	Residential or commercial with surface parking	1924	0.17	Yes	Moderate	12	8
2249 GRANT RD	31816009	CN	Neighborhood Commercial	0.31	Commercial building with surface parking	1962	0.49	No	Moderate	12	8
5084 EL CAMINO REAL	17004065	CT	Thoroughfare Commercial	0.31	Individual Retail Stores	1950	1.16	No	Moderate	12	10
2073 GRANT RD	31816015	CN	Neighborhood Commercial	0.32	Auto Service, Garages and surface parking	1959	0.22	No	Moderate	12	9
PARKING LOT ONLY	16738038	CRS	Public and Institutional	0.34	Surface parking	0	0.00	No	Moderate	7	5
2251 GRANT RD	31816008	CN	Neighborhood Commercial	0.44	Offices and surface parking lot	1975	0.27	No	Moderate	17	12
1ST ST	16739057	CRS	Public and Institutional	0.57	Surface parking lot	0		No	Moderate	11	8
4TH ST	16738029	CRS	Public and Institutional	0.58	Surface parking lot	0		No	Moderate	12	8
STATE ST	16738028	CRS	Downtown Commercial	0.58	Surface parking lot	0		No	Moderate	12	8
2ND ST	16739069	CRS	Public and Institutional	0.60	Surface parking lot	0		No	Moderate	12	8
342 1ST ST	16741003	CRS	Downtown Commercial	1.00	Supermarket w. surface parking lot	1966	0.52	No	Moderate	20	14
1ST ST	16739032	CRS	Public and Institutional	1.04	Surface parking lot	0		No	Moderate	21	15
2ND ST	16739007	CRS	Public and Institutional	1.18	Surface parking lot	0		No	Moderate	24	16
									Total - Moderate		**168**

Table B-10: Housing Sites (Under Existing Zoning, Continued)

Address	APN	Zoning	General Plan[1]	Parcel Size	Existing Use	Year Built[2]	ILV[3]	5th Cycle Site[4]	Income Category	Units (Max)	Units (Realistic, Net)
355 STATE ST	16739060	CRS	Downtown Commercial	0.05	Restaurants, Bars	1962	0.46	No	Above Moderate	1	1
168 MAIN ST	16738024	CRS	Downtown Commercial	0.05	Commercial and surface parking lot	1957	0.48	No	Above Moderate	1	1
290 MAIN ST	16739105	CRS	Downtown Commercial	0.05	Commercial	1940	0.76	No	Above Moderate	1	1
380 MAIN ST	16739089	CRS	Downtown Commercial	0.05	Commercial and surface parking lot	1950	0.35	No	Above Moderate	1	1
334 MAIN ST	16739084	CRS	Downtown Commercial	0.05	Commercial	1959	1.00	No	Above Moderate	1	1
346 MAIN ST	16739085	CRS	Downtown Commercial	0.05	Commercial and surface parking lot	1910	0.39	No	Above Moderate	1	1
991 N SAN ANTONIO RD	17001029	CN	Thoroughfare Commercial	0.05	Commercial and surface parking lot	1942	0.41	No	Above Moderate	2	1
252 MAIN ST	16739075	CRS	Downtown Commercial	0.06	Commercial and surface parking lot	1951	0.17	No	Above Moderate	1	1
1005 ACACIA AV	17001045	CN	Thoroughfare Commercial	0.06	Surface parking lot	1940	0.00	Yes	Above Moderate	2	2
398 MAIN ST	16739091	CRS	Downtown Commercial	0.06	Commercial	1910	0.51	No	Above Moderate	1	1
242 STATE ST	16739011	CRS	Downtown Commercial	0.06	Restaurants, Bars	1960	0.67	No	Above Moderate	1	1
244 STATE ST	16739012	CRS	Downtown Commercial	0.06	Restaurants, Bars	1920	0.47	No	Above Moderate	1	1
351 MAIN ST	16740004	CRS	Downtown Commercial	0.06	Commercial with surface parking lot	1925	0.50	No	Above Moderate	1	1
60 MAIN ST	16738057	CRS/OAD	Downtown Commercial	0.06	Office or church	1963	0.72	No	Above Moderate	-	1
189 MAIN ST	16738053	CRS	Downtown Commercial	0.06	Commercial or Offices	1960	0.25	No	Above Moderate	1	1
4598 EL CAMINO REAL	17001036	CN	Thoroughfare Commercial	0.07	Commercial and surface parking lot	1960	0.86	No	Above Moderate	3	2
N SAN ANTONIO RD	17001035	CN	Thoroughfare Commercial	0.07	Surface parking lot	0	0.00	No	Above Moderate	3	2
399 1ST ST	16741021	CD/R3	Downtown Commercial	0.07	Restaurant and surface parking lot	1951	0.40	No	Above Moderate	4	3
395 1ST ST	16741022	CD/R3	Downtown Commercial	0.07	Office and surface parking lot	1954	0.13	No	Above Moderate	4	3
248 MAIN ST	16739074	CRS	Downtown Commercial	0.07	Commercial or office with surface parking	1948	0.66	No	Above Moderate	1	1
139 1ST ST	16739043	CD/R3	Downtown Commercial	0.08	Auto Service, Garages	1949	2.41	No	Above Moderate	5	4
141 1ST ST	16739042	CD/R3	Downtown Commercial	0.08	General Office	2008	3.09	No	Above Moderate	5	4
1019 N SAN ANTONIO RD	17001030	CN	Thoroughfare Commercial	0.08	Surface parking lot	0	0.00	No	Above Moderate	3	2
170 MAIN ST	16738025	CRS	Downtown Commercial	0.09	Bank and surface parking	0	0.00	No	Above Moderate	2	1
1ST ST	16741006	CD/R3	Downtown Commercial	0.10	Surface parking lot	0	0.00	No	Above Moderate	6	4
179 MAIN ST	16738052	CRS	Downtown Commercial	0.10	Commercial/restaurant	1952	0.12	No	Above Moderate	2	1
133 MAIN ST	16738013	CRS	Downtown Commercial	0.10	Commercial stores	1955	0.32	No	Above Moderate	2	1
925 N SAN ANTONIO RD	17001026	CN	Thoroughfare Commercial	0.10	Dentist Office and surface parking	1961	0.92	No	Above Moderate	4	3
4TH ST	16738051	CRS	Downtown Commercial	0.10	Surface parking lot	0		No	Above Moderate	2	1
141 MAIN ST	16738012	CRS	Downtown Commercial	0.10	Commercial and restaurant	1952	0.74	No	Above Moderate	2	1
1ST ST	16741016	CD/R3	Downtown Commercial	0.11	Surface parking lot	0	0.03	Yes	Above Moderate	7	5
285 STATE ST	16739064	CRS	Downtown Commercial	0.11	Stores	1953	0.29	No	Above Moderate	2	2
SHERWOOD AV	17001064	CN	Thoroughfare Commercial	0.11	Offices	0	0.00	No	Above Moderate	4	3
262 MAIN ST	16739076	CRS	Downtown Commercial	0.11	Commercial and surface parking	1950	0.86	No	Above Moderate	2	2
988 SHERWOOD AV	17001042	CN	Thoroughfare Commercial	0.12	Surface parking lot	1900	0.00	Yes	Above Moderate	5	3
952 ACACIA AV	17001049	CN	Thoroughfare Commercial	0.12	Surface parking lot	1947	0.62	Yes	Above Moderate	5	3
252 STATE ST	16739097	CRS	Downtown Commercial	0.12	Commercial	1939	0.89	No	Above Moderate	2	2
357 MAIN ST	16740003	CRS	Downtown Commercial	0.12	Commercial	1936	0.58	No	Above Moderate	2	2

Table B-10: Housing Sites (Under Existing Zoning, Continued)

Address	APN	Zoning	General Plan[1]	Parcel Size	Existing Use	Year Built[2]	ILV[3]	5th Cycle Site[4]	Income Category	Units (Max)	Units (Realistic, Net)
435 1ST ST	16741018	CD/R3	Downtown Commercial	0.12	Stores and surface parking	1946	0.19	No	Above Moderate	7	5
366 1ST ST	16741051	CD/R3	Downtown Commercial	0.12	Commercial or office with surface parking	1955	0.00	No	Above Moderate	8	5
160 MAIN ST	16738021	CRS	Downtown Commercial	0.12	Office or commercial building with surface parking	1955	0.87	No	Above Moderate	2	2
147 MAIN ST	16738011	CRS	Downtown Commercial	0.13	Commercial building	1954	0.99	No	Above Moderate	3	2
905 N SAN ANTONIO RD	17001023	CN	Thoroughfare Commercial	0.14	Commercial and surface parking lot	1955	0.24	No	Above Moderate	5	4
270 2ND ST	16740073	CD	Downtown Commercial	0.14	Parking for Existing Office Buildings	0	0.00	No	Above Moderate	-	2
151 MAIN ST	16738010	CRS	Downtown Commercial	0.15	Commercial	1954	0.82	No	Above Moderate	3	2
394 2ND ST	16741054	CD	Downtown Commercial	0.16	Surface parking lot	0	0.01	Yes	Above Moderate	-	2
325 1ST ST	16740050	CD/R3	Downtown Commercial	0.16	Commercial or industrial building	1954	0.44	No	Above Moderate	10	7
317 1ST ST	16740051	CD/R3	Downtown Commercial	0.16	Auto Service, Garages	1962	0.12	No	Above Moderate	10	7
309 1ST ST	16740052	CD/R3	Downtown Commercial	0.16	Auto Service, Garages	1924	0.87	No	Above Moderate	10	7
2ND ST	16740042	CD	Downtown Commercial	0.16	Surface parking lot	0	0.00	No	Above Moderate	-	2
127 1ST ST	16739045	CD/R3	Downtown Commercial	0.16	Restaurants, Bars	1998	0.46	No	Above Moderate	10	7
145 1ST ST	16739041	CD/R3	Downtown Commercial	0.16	Restaurants with surface parking	1950	0.56	No	Above Moderate	10	7
151 1ST ST	16739040	CD/R3	Downtown Commercial	0.16	Store and surface parking	1974	0.67	No	Above Moderate	10	7
129 1ST ST	16739044	CD/R3	Downtown Commercial	0.16	Individual Retail Stores	2008	0.85	No	Above Moderate	10	7
PARKING LOT ONLY	16738050	CRS	Public and Institutional	0.16	Surface parking lot	0	0.00	No	Above Moderate	3	2
101 1ST ST	16739127	CD/R3	Downtown Commercial	0.17	Offices or commercial and surface parking	1980	0.07	No	Above Moderate	11	7
ORANGE AV	17516020	R1-10	Single-Family, Small Lot (10 du/net acre)	0.18	Surface parking lot	0	0.18	No	Above Moderate	1	1
4TH ST	16738049	CRS	Public and Institutional	0.18	Surface parking lot	0		No	Above Moderate	4	3
987 ACACIA AV	17001043	CN	Thoroughfare Commercial	0.18	Commercial or Residential	1945	0.15	Yes	Above Moderate	7	5
1031 N SAN ANTONIO RD	17001032	CN	Thoroughfare Commercial	0.19	Restaurants, Bars and surface parking	1946	0.42	No	Above Moderate	7	5
32 LOUCKS AV	16716018	CT	Thoroughfare Commercial	0.20	Surface parking lot	1900	0.20	Yes	Above Moderate	7	6
971 N SAN ANTONIO RD	17001027	CN	Thoroughfare Commercial	0.21	Restaurant and surface parking	1953	0.15	No	Above Moderate	8	6
SIERRA VENTURA DR	34224058	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.22	Undeveloped land	0	0.00	No	Above Moderate	1	1
775 EDGE LN	18918102	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.23	Undeveloped land	1938	0.00	No	Above Moderate	1	1
1347 RICHARDSON AV	31807008	R1-10	Public and Institutional	0.23	Undeveloped lot	0	0.00	Yes	Above Moderate	1	1
942 ACACIA AV	17001051	CN	Thoroughfare Commercial	0.23	Home or commercial building with surface parking	1950	0.40	Yes	Above Moderate	9	6
994 SHERWOOD AV	17001086	CN	Thoroughfare Commercial	0.23	Surface parking lot	1900	0.11	Yes	Above Moderate	9	6
915 ST JOSEPH AV	34205032	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.24	Undeveloped land	0	0.00	No	Above Moderate	1	1
270 LOS ALTOS CT	16736068	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.24	Undeveloped land	0	0.00	No	Above Moderate	1	1
915 N SAN ANTONIO RD	17001025	CN	Thoroughfare Commercial	0.24	Offices or commercial with surface parking	1930	0.57	No	Above Moderate	9	7
625 PALM AV	17516088	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.24	Undeveloped land	0	0.00	No	Above Moderate	1	1
1040 RUNNYMEAD CT	19344033	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.24	Undeveloped land	0	0.00	No	Above Moderate	1	1
718 RONALD CT	18919003	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.25	Undeveloped land	0	0.00	No	Above Moderate	1	1
608 UNIVERSITY TR	17514021	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.29	Undeveloped land	0	0.00	No	Above Moderate	1	1
74 OAK ST	16736008	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.30	Undeveloped lot	0	0.00	No	Above Moderate	1	1
416 2ND ST	16741072	CD	Downtown Commercial	0.30	Restaurants, Bars	1950	0.46	No	Above Moderate	-	4

Table B-10: Housing Sites (Under Existing Zoning, Continued)

Address	APN	Zoning	General Plan[1]	Parcel Size	Existing Use	Year Built[2]	ILV[3]	5th Cycle Site[4]	Income Category	Units (Max)	Units (Realistic, Net)
2050 LONGDEN CL	34210088	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.30	Undeveloped lot	1900	0	No	Above Moderate	1	1
899 MADONNA WY	33603030	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.30	Undeveloped land	0	0	No	Above Moderate	1	1
330 2ND ST	16741046	CD	Downtown Commercial	0.33	General Office and surface parking	1964	0.8	No	Above Moderate	-	5
1276 MONTCLAIRE WY	34209045	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.35	Undeveloped lot	1900	0	No	Above Moderate	2	1
34 MT HAMILTON AV	16737034	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.36	Undeveloped lot	0	0	No	Above Moderate	2	1
379 HAWTHORNE AV	17028058	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.45	Vacant flag lot	0	0	No	Above Moderate	2	1
1491 MIRAMONTE AV	19341039	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.45	Vacant flag lot	0	0	No	Above Moderate	2	1
275 3RD ST	16738065	CD	Downtown Commercial	0.46	Bank and surface parking lot	1977	0.25	No	Above Moderate	-	6
420 W PORTOLA AV	16720050	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.46	Undeveloped lot	0	0	No	Above Moderate	2	1
NASH RD	33602008	R1-H	Single-Family, Large Lot (2 du/net acre)	0.48	Undeveloped lot	0	0	No	Above Moderate	1	1
ALTA VISTA	16735076	R1-10	Single-Family, Medium Lot (4 du/net acre)	0.72	Undeveloped lot	0	0	No	Above Moderate	3	1
301 2ND ST	16740056	CD	Downtown Commercial	0.80	Commercial building and surface parking lot	1963	0.14	No	Above Moderate	-	11
1ST ST	16740039	CD	Downtown Commercial	1.06	Surface parking lot	0		No	Above Moderate	-	15
2ND ST	16740072	CD	Downtown Commercial	1.07	Commercial Open Space Uses, Public Parking Lots	0		No	Above Moderate	-	15
ARBORETUM DR	34204078	R1-10	Public and Institutional	1.12	Undeveloped lot	0	0	Yes	Above Moderate	5	1
1000 FREMONT AV	31801036	CN	Neighborhood Commercial	1.56	Medical, Dental, Veterinary w. surface parking lot	1960	1.22	No	Above Moderate	61	4
701 CATALINA WY	17012042	R1-10	Public and Institutional	1.70	Church w. surface parking lot	0	0.1	No	Above Moderate	7	5
NO ADDRESS	16738002	CD	Downtown Commercial	2.03	Surface parking lot	0		No	Above Moderate	-	28
2100 WOODS LN	34204089	R1-10	Public and Institutional	7.97	Potentially a school w. a playground related to a church	1971	0	No	Above Moderate	35	10
									Total - Above Moderate		**323**

[1]The "Public and Institutional" General Plan designation allows housing consistent with the zoning district.
[2]Zeroes indicate Year Built data unavailable.
[3]Blanks or zeroes indicate that the property is owned by a governmental agency (e.g., City of Los Altos) and is not being assessed; no improvement or land value available.
[4]Vacant parcels identified in the 5th Cycle Housing Element are assumed to have also been included in the 4th Cycle Housing Element.

Source: City of Los Altos, Santa Clara County Assessor, LWC

Table B-11: Rezone Sites

Address	APN	Zoning	General Plan[1]	Parcel Size	Existing Use	Year Built[2]	ILV	5th Cycle Site	Income Category	Units without Rezoning	Units with Rezoning	Net Units	Lower	Moderate	Above Moderate
B ST	18915088	CN	Neighborhood Commercial	0.09	Surface parking lot	1900	0.02	No	Above Moderate	0	2	2			2
1564 MIRAMONTE AV	18915090	CN	Neighborhood Commercial	0.11	Offices and Surface Parking lot	1954	0.78	No	Above Moderate	0	3	3			3
1530 MIRAMONTE AV	18915042	CN	Neighborhood Commercial	0.12	Office and surface parking	1947	0.45	No	Above Moderate	0	3	3			3
991 DOLORES AV	18915026	CN	Neighborhood Commercial	0.12	Undeveloped land	0	0.00	No	Above Moderate	0	3	3			3
982 DOLORES AV	18915041	CN	Neighborhood Commercial	0.12	Restaurant and surface parking lot	1950	0.23	No	Above Moderate	0	3	3			3
1534 CAROB LN	18915038	CN	Neighborhood Commercial	0.13	Office and surface parking	1950	0.40	No	Above Moderate	0	4	4			4
979 FREMONT AV	18915059	CN	Neighborhood Commercial	0.17	Commercial and surface parking	1956	0.40	No	Above Moderate	0	5	5			5
949 FREMONT AV	18915063	CN	Neighborhood Commercial	0.17	Offices or commercial and surface parking	1953	0.74	No	Above Moderate	0	5	5			5
948 DOLORES AV	18915103	CN	Neighborhood Commercial	0.21	Medical, Dental, Veterinary and surface parking	1950	0.21	No	Above Moderate	0	6	6			6
981 FREMONT AV	18915102	CN	Neighborhood Commercial	0.26	Offices or commercial with surface parking	1945	0.67	No	Moderate	0	7	7		7	
1188 LOS ALTOS AV	16710094	CT	Thoroughfare Commercial	0.51	Commercial and surface parking	1956	1.15	No	Lower	16	20	4	4		
EL CAMINO REAL	17003084	CT	Thoroughfare Commercial	0.54	Surface parking lot	0	0.00	Yes	Lower	16	22	6	6		
32 LOUCKS AV	16716018	CT	Thoroughfare Commercial	0.20	Surface parking lot	1900	0.20	Yes	Above Moderate	6	8	2			2
4940 EL CAMINO REAL	17003083	CT	Thoroughfare Commercial	0.20	General Office	2015	3.39	No	Above Moderate	0	8	8			8
5084 EL CAMINO REAL	17004065	CT	Thoroughfare Commercial	0.31	Individual Retail Stores	1950	1.16	No	Moderate	10	13	3		3	
4844 EL CAMINO REAL	17002023	CT	Thoroughfare Commercial	0.55	Retail store (candy shop) and surface parking lot	0	1.57	Yes	Lower	17	22	5	5		
895 SHERWOOD AV	17001055	OA	Thoroughfare Commercial	0.56	Multi-tenant (massage and fitness studio) and surface parking lot	1973	0.81	No	Lower	0	11	11	11		
745 DISTEL DR	17004045	OA	Thoroughfare Commercial	0.56	Multi-tenant (architecture and financial services offices)	1963	0.00	No	Lower	0	11	11	11		
4500 EL CAMINO REAL	16712045	CT	Thoroughfare Commercial	0.56	Multi-tenant (personal services - massage, hair studio, fencing club) and surface parking lot	1976	1.73	No	Lower	17	23	6	6		
289 S SAN ANTONIO RD	17041086	OA	Downtown Commercial	0.60	Multi-tenant (title company, financial services, pool and spa) and surface parking lot	1977	2.11	No	Lower	0	12	12	12		
5000 EL CAMINO REAL	17004050	CT	Thoroughfare Commercial	0.62	Carl's Jr. and surface parking lot	1974	0.11	Yes	Lower	19	25	6	6		
4906 EL CAMINO REAL	17003077	CT	Thoroughfare Commercial	0.69	Multi-tenant (medical, dental, and other offices) and surface parking lot	1984	1.16	No	Lower	21	28	7	7		
901 FREMONT AV	18915106	CN	Neighborhood Commercial	0.70	Bank and surface parking lot	1961	0.53	No	Lower	0	19	19	19		
399 S SAN ANTONIO RD	17040082	OA	Downtown Commercial	0.76	Mortuary and surface parking lot	0	0.00	No	Lower	0	15	15	15		
4970 EL CAMINO REAL	17064120	CT	Thoroughfare Commercial	0.78	Multi-tenant offices and surface parking lot	1985	0.17	No	Lower	24	31	7	7		
475 S SAN ANTONIO RD	17039053	OA	Downtown Commercial	0.13	General Office	1973	0.73	No	Above Moderate	0	3	3			3
129 FREMONT AV	17038062	OA	Downtown Commercial	0.15	R-1 Converted to Office	1978	0.91	Yes	Above Moderate	0	3	3			3
29 HAWTHORNE AV	17041037	OA	Downtown Commercial	0.19	R-1 Converted to Office	1990	0.45	No	Above Moderate	0	4	4			4
241 S SAN ANTONIO RD	17041065	OA	Downtown Commercial	0.22	General Office	1953	0.49	No	Above Moderate	0	4	4			4
195 S SAN ANTONIO RD	17041068	OA	Downtown Commercial	0.24	General Office	1977	0.27	No	Above Moderate	0	5	5			5

Table B-11: Rezone Sites (Continued)

Address	APN	Zoning	General Plan[1]	Parcel Size	Existing Use	Year Built[2]	ILV	5th Cycle Site	Income Category	Units without Rezoning	Units with Rezoning	Net Units	Lower	Moderate	Above Moderate
495 S SAN ANTONIO RD	17039058	OA	Downtown Commercial	0.24	General Office	1970	0.46	No	Above Moderate	0	5	5			5
301 S SAN ANTONIO RD	17040072	OA	Downtown Commercial	0.26	General Office	1972	0.73	No	Moderate	0	5	5		5	
40 HAWTHORNE AV	17041014	OA	Downtown Commercial	0.28	General Office	1978	0.63	No	Moderate	0	6	6		6	
778 ALTOS OAKS DR	18916006	OA	Neighborhood Commercial	0.32	Medical, Dental, Veterinary	1957	0.56	No	Moderate	0	6	6		6	
762 ALTOS OAKS DR	18916005	OA	Neighborhood Commercial	0.32	Medical, Dental, Veterinary	1959	0.55	No	Moderate	0	6	6		6	
747 ALTOS OAKS DR	18916017	OA	Neighborhood Commercial	0.32	Medical, Dental, Veterinary	1960	0.16	No	Moderate	0	6	6		6	
802 ALTOS OAKS DR	18916008	OA	Neighborhood Commercial	0.32	Medical, Dental, Veterinary	1958	0.25	No	Moderate	0	6	6		6	
746 ALTOS OAKS DR	18916004	OA	Neighborhood Commercial	0.33	Medical, Dental, Veterinary	1959	0.08	No	Moderate	0	7	7		7	
811 ALTOS OAKS DR	18916013	OA	Neighborhood Commercial	0.33	Medical, Dental, Veterinary	1961	0.47	No	Moderate	0	7	7		7	
763 ALTOS OAKS DR	18916016	OA	Neighborhood Commercial	0.33	Medical, Dental, Veterinary	1962	0.68	No	Moderate	0	7	7		7	
795 ALTOS OAKS DR	18916014	OA	Neighborhood Commercial	0.33	Medical, Dental, Veterinary	1960	0.40	No	Moderate	0	7	7		7	
826 ALTOS OAKS DR	18916009	OA	Neighborhood Commercial	0.34	Medical, Dental, Veterinary	1958	0.30	No	Moderate	0	7	7		7	
731 ALTOS OAKS DR	18916018	OA	Neighborhood Commercial	0.34	Medical, Dental, Veterinary	1957	0.79	No	Moderate	0	7	7		7	
827 ALTOS OAKS DR	18916012	OA	Neighborhood Commercial	0.34	Medical, Dental, Veterinary	1960	0.18	No	Moderate	0	7	7		7	
369 S SAN ANTONIO RD	17040062	OA	Downtown Commercial	0.38	General Office	1973	0.43	No	Moderate	0	8	8		8	
842 ALTOS OAKS DR	18916010	OA	Neighborhood Commercial	0.40	Medical, Dental, Veterinary	1957	0.68	No	Moderate	0	8	8		8	
730 ALTOS OAKS DR	18916003	OA	Neighborhood Commercial	0.42	Medical, Dental, Veterinary	1958	0.67	No	Moderate	0	8	8		8	
900 N SAN ANTONIO RD	16716022	OA	Thoroughfare Commercial	0.49	General Office	1900	0.16	No	Moderate	0	10	10		10	
161 S SAN ANTONIO RD	17042028	OA	Downtown Commercial	0.90	Multi-tenant (real estate offices) and surface parking lot	1979	0.71	No	Lower	0	18	18	18		
4988 EL CAMINO REAL	17064119	CT	Thoroughfare Commercial	0.94	Partially occupied multi-tenant (tax and accounting services, other general offices) and surface parking lot	1981	0.13	No	Lower	29	38	9	9		
211 S SAN ANTONIO RD	17041079	OA	Downtown Commercial	0.99	Bank and surface parking lot	0	0.35	No	Lower	0	20	20	20		
4926 EL CAMINO REAL	17003073	CT	Thoroughfare Commercial	1.05	Restaurant and surface parking lot	1968	0.05	No	Lower	32	42	10	10		
1000 FREMONT AV[3]	31801036	CN	Neighborhood Commercial	1.56	Partially occupied multi-tenant commercial and surface parking lot	1960	1.22	No	Lower	4	43	39	43		-4
4546 X EL CAMINO REAL	16712047	CT	Thoroughfare Commercial	1.69	Portion of Village Court; Partially occupied multi-tenant (commercial, including restaurants, general and medical offices, insurance and financial institutions) and surface parking lot	1964	0.00	Yes	Lower	51	67	16	16		
851 FREMONT AV	18914081	OA	Neighborhood Commercial	1.85	Partially occupied multi-tenant (medical offices) and surface parking lot	1970	0.75	No	Lower	0	37	37	37		
655 MAGDALENA AV	33609023	PCF	Public and Institutional	6.06	Los Altos United Methodist Church, preschool, and surface parking lot	0	18.00	No	Lower	0	15	15	15		
625 MAGDALENA AV	33609018	PCF	Public and Institutional	6.50	Bridges Community Church and surface parking lot	0	12.31	No	Lower	0	20	20	20		
4546 EL CAMINO REAL[4]	16712042	R1-10	Thoroughfare Commercial	2.78	Portion of Village Court Shopping Center; Partially occupied multi-tenant (general and medical offices, commercial services and retail, including massage, postal services, therapy) and surface parking lot	1964	3.71	Yes	Lower	0	111	111	111		
											Net New Capacity	**600**	**408**	**128**	**64**
											Baseline Capacity	**1048**	**557**	**168**	**323**
											Total Capacity	**1648**	**965**	**296**	**387**

[1]The "Public and Institutional" General Plan designation allows housing consistent with the zoning district.
[2]Zeroes indicate Year Built data unavailable.
[3]Due to rezoning, income level would shift from above moderate to lower, resulting in a loss of above moderate capacity.
[4]APN 16712042 would be rezoned to CT, and therefore would accommodate 111 lower income units (the R1-10 zoning district generally accommodates above moderate units).

Source: City of Los Altos, Santa Clara County Assessor, LWC

Appendix C: Housing Constraints

Contents

Section C.1 Introduction and Summary

C.1.1 Introduction

This Appendix covers local governmental, non-governmental, and environmental and infrastructure constraints to housing production in Los Altos.

C.1.2 Summary

City policies and regulations, such as the Zoning Code, and market factors outside of the City's control affect the quantity and type of residential development that occur in Los Altos. The following summarizes key governmental, nongovernmental, and potential constraints to housing development as detailed in this Appendix.

Governmental Constraints

- Mixed-use developments in various zoning districts are limited to 30 feet or two stories. While development projects often receive a height concession resulting from adherence to inclusionary requirements, this existing height limit still poses a potential constraint to residential unit production in mixed-use zones.
- Certain area or site-specific development standards are a constraint to housing development. These include a restrictive FAR standard for the Rancho Shopping Center and Woodland Plaza and a density cap in the Loyola Corners Specific Plan. However, the Loyola Corners Specific Plan density cap is not enforceable while the Housing Crisis Act is in effect (currently through 2030).

- Parking standards, including rates, parking minimums, lack of in-lieu options, and design requirements (e.g., size, layout, location, etc.), limit feasibility of residential and residential mixed-use projects.
- In most cases (except Accessory Dwelling Units and SB 9 Projects), multi-family residential and residential mixed-use projects, and single-family projects, are subject to Administrative Design Review (City staff review), Design Review Commission, Planning Commission, Complete Streets Commission, and City Council approval through conditional use permit and/or design review requirements, resulting in an extended review process. When required, final approval or concurrence by the City Council adds an additional review within the process. Furthermore, a third-party independent architect review is required for projects located in the Downtown. The review process should be streamlined with fewer review bodies and the consolidation of duties authorized by the City Council and contained within the Municipal Code.
- Subjective standards and findings, while limited in their applicability to housing developments due to State law, could result in uncertainty for developers and a longer application review process.
- The story pole requirement adds subjectivity and extends the review process of a proposed housing development, including for developments that propose building heights consistent with the Zoning Code or State law. Additionally, because of the increased capabilities of renderings and 3D Modeling, story poles often do not provide the visual understanding that can be achieved by project specific renderings and 3D Modeling which are also required for Commercial and Multi-Family Design Review Submittals.
- The City does not have a reasonable accommodation process to address requests from persons with disabilities to waive Zoning Code standards to ensure homes are accessible for the mobility impaired.
- Certain zoning provisions will need to be updated to comply with State law (e.g., allow Low Barrier Navigation Centers where residential multi-family uses are allowed and in mixed-use zones (AB 101), allow qualifying supportive housing by-right where residential is allowed (AB 2162), increase density bonus up to 50 percent (AB 2345), etc.).

Nongovernmental Constraints

- Economic conditions in Los Altos reflect a competitive housing market for both for-sale and rental housing.
- Los Altos is generally built out, so future housing development will be constrained by existing development or require demolishing existing structures, improvements, and uses. The lack of available vacant land may constrain housing production due to the increased costs associated with redevelopment.

Section C.2 Governmental Constraints

C.2.1 Introduction

Local policies and regulations can affect the quantity and type of residential development. Since governmental actions can constrain the development and the affordability of housing, State law requires the housing element to "address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing" (Government Code §65583(c)(3)).

As with other cities, Los Altos' development standards and requirements are intended to protect the long-term health, safety, and welfare of the community. The City charges fees and has various procedures and regulations developers are required to follow. There are many locally imposed land use and development requirements that can affect the type, appearance, and cost of housing built in Los Altos. These local requirements include zoning standards, development processing procedures, development fees, and subdivision design standards. Other building and design requirements imposed by Los Altos follow State laws, the California Building Code, Subdivision Map Act, energy conservation requirements, etc. In addition to a review of these policies and regulations, an analysis of the governmental constraints on housing production for persons with disabilities is included in this Section.

C.2.2 Land Use Controls

This Section provides an overview of the City's land use controls and their relation to the City's housing supply.

General Plan Land Use Designations

The City adopted the Los Altos General Plan 2002 – 2020 in 2002. The Land Use Element of the General Plan directs the location and form of future development in the city.

The General Plan includes 11 land use designations that allow residential development at a variety of densities (see Table C-1). *Density* is used for residential land use designations and is described in terms of dwelling units per net acre of land (du/acre). For mixed use designations, *intensity* is used, expressed as the floor area ratio (FAR) of total gross floor area of all buildings on a lot and the total land area of that lot (e.g., a single-story building that covers half of the lot would have an FAR of 0.50:1).

Additionally, the General Plan requires "development projects within the Low and Medium Density Multi-Family and Senior Housing designations to be developed at 75 to 100 percent of the

maximum density permitted by the associated zoning unless the City Council determines that a less dense project is in the best interest of the community."[1]

Table C-1: City General Plan Residential Land Use Designations

General Plan Designation	Maximum Density/Intensity	Description
Single-Family Large Lot	2.0	Detached single-family homes on large lots.
Single-Family Medium Lot	4.0	Detached single-family homes.
Single-Family Small Lot	10.0	Detached single-family home on smaller lots.
Low Density Multi-Family	15.0	Detached and attached single-family homes, condominiums, duplexes, and apartments.
Senior Housing	28.0	Detached and attached single-family homes, condominiums, duplexes, and apartments for seniors
Medium Density Multi-Family	38.0	Detached and attached single-family homes, condominiums, and apartments.
Neighborhood Commercial		Retail uses serving the needs of nearby neighborhoods. Specified areas may also include general business, medical, or professional office uses. Residential development is allowed by right at Foothill Plaza.
Foothill Plaza	2.0:1 w/ residential	
All other locations	0.5:1 w/ residential	
Downtown Commercial		General retail uses and service, commercial recreational, cultural, and office uses that serve local residents. Higher density residential uses that enhance the village character of the Downtown are also allowed by right in the Core and Periphery areas above the ground floor. Such uses may be allowed elsewhere, subject to Use Permit approval.
Downtown Core	2.0:1 w/ residential	
Downtown Periphery	2.0:1 w/ residential	
Thoroughfare Commercial		Retail, service, and small office uses that typically rely on vehicle traffic and serve the city and/or regional market. Permits mixed use development and affordable residential opportunities along El Camino Real Corridor.
El Camino Real Corridor	1.5:1 w/ mixed-use	
Public and Institutional	0.6:1	Government, institutional, academic, group residence, church, community service uses, easements, rights-of-way, facilities of public and private utilities, and parking.
Planned Community	Varies	Various single-family and residential densities and housing types, as well as community facilities, private schools, recreational areas, religious facilities, education or philanthropic institutions, public utilities and services, hospitals, and open space areas.
Source: City of Los Altos General Plan (2002)		

[1] Los Altos General Plan, Land Use Element, p.8

Specific Plans

The City has adopted specific plans to guide the development in certain areas of the city. These specific plans provide unique standards based on special considerations within the planning areas.

Loyola Corners Specific Plan

The Loyola Corners Specific Plan was developed in 1990 and updated in 2017. It is a document that identifies potential growth, vehicle circulation and parking, building design standards and an implementation schedule for area enhancements. The intent of the update was to simplify the plan and clarify the policies and standards, clarify implementation of the plan, and remove outdated and unnecessary requirements. The updates were adopted by the City Council on October 10, 2017.

The Loyola Corners Specific Plan covers approximately 17 acres located along Foothill Expressway in the southwest portion of Los Altos. The commercial portion is within the Commercial Neighborhood (CN) District but subject to additional requirements of the Loyola Corners Specific Plan Zone District (LC/SPZ) (Municipal Code Chapter 14.42), primarily applicable to nonresidential uses. However, the 2017 amendments limit residential development to an increase of 20 additional dwelling units; such units are required to be between 1,500 and 8,000 square feet (Resolution 2017-41). These limitations on unit size and density do not exist elsewhere in the city. The Housing Crisis Act of 2019 (Senate Bill 330, Government Code §66300) prohibits jurisdictions from implementing any provision that limits the number of housing unit approvals or permits that can be issued or acts as a cap on the number of housing units that can be approved or constructed over any period. These provisions of the Housing Crisis Act went into effect on January 1, 2020, and remain in effect until January 1, 2030[2]. While the Housing Crisis Act preempts and precludes the City's enforcement of the Loyola Corners Specific Plan density cap while the Housing Crisis Act is in effect, the City will amend the Loyola Corners Specific Plan's density cap and other standards to facilitate housing in this area (Program 1.E).

Sherwood Gateway Specific Plan

The Sherwood Gateway Specific Plan is designed to help accomplish two goals: economic revitalization of the City's Sherwood Gateway; and preservation of the surrounding neighborhood's residential character. The plan was developed in 1999 and updated in 2008. This Specific Plan area contains both commercial and residential uses and is located southwest of El Camino Real, centered primarily around San Antonio Road and Sherwood Avenue. A significant focus of the Specific Plan is urban design, circulation, and aesthetic improvements; standards in the underlying zones apply.

[2] The Housing Crisis Act (HCA), originally set to expire in 2025, was extended to 2030 by SB 8. SB 8 further extended specific provisions of the HCA to 2034 (e.g., prohibition of conducting more than five hearing and vesting rights for housing projects that submit a qualifying preliminary application).

Downtown Vision Plan

The City prepared a Downtown Vision Plan (Vision Plan) to help shape the future of Downtown Los Altos, which was approved in 2018. The purpose of the Vision Plan is to provide the community with a vision for the future of the Downtown triangle to guide growth and development over the next 20 years. This Vision Plan acts as the guiding document for future development of the Downtown, maintaining the community's history, values, and desired intensity of development, while also allowing for incremental change intended to facilitate a unique, vibrant village that exemplifies the exceptional character and qualities of Los Altos. The adopting City Council in 2018 noted that as with all land use decisions modifications to existing development standards will undergo the standard community engagement process prior to adoption of new regulations.

Zoning Districts

The Zoning Code is Title 14 of the Los Altos Municipal Code. The Zoning Code[3], Zoning Map[4], specific plans[5], and application forms[6] that contain compiled lists of information required for a development project are available on the City's website consistent with transparency requirements (Government Code §65940.1(a)(1)). This Section analyzes the Zoning Code and the districts which allow residential development, including commercial districts which allow multi-family residential development. Table C-2 lists the districts that allow residential development with a description of each.

[3] City of Los Altos, Municipal Code, https://www.losaltosca.gov/cityclerk/page/los-altos-municipal-code
[4] City of Los Altos, Zoning Map, https://www.losaltosca.gov/sites/default/files/fileattachments/community_development/page/39021/los_altos-zoning_final_w_labels-24x36-20181026.pdf
[5] City of Los Altos, Adopted Plans, https://www.losaltosca.gov/development-services/page/adopted-plans
[6] City of Los Altos, Forms and Handouts, https://www.losaltosca.gov/development-services/page/forms-and-handouts-0

Table C-2: Zoning Districts that Allow Residential Development

Zoning District	Description
Single-Family (R1-40)	Provide for single-family detached homes on lots with a minimum site area of 40,000 square feet.
Single-Family (R1-20)	Provide for single-family detached homes on lots with a minimum site area of 20,000 square feet.
Single-Family (R1-H)	Provide for single-family detached homes on lots with a minimum site area of 20,000 square feet and larger rear yard setbacks than the R1-20 District.
Single-Family (R1-10)	Provide for single-family detached homes on lots with a minimum site area of 10,000 square feet.
Multiple-Family (R3-5)	Provide for apartments and two-family units such that there is not more than one dwelling unit per 5,000 square feet of lot area.
Multiple-Family (R3-4.5)	Retain and enhance the character of the Stevens Place and Marshall Court area as a two-family dwelling unit neighborhood.
Multiple-Family (R3-3)	Provide for apartments and two-family units such that there is not more than one dwelling unit per 3,000 square feet of lot area.
Multiple-Family (R3-1.8)	Provide for multi-family residential units such that there is not more than one dwelling unit per 1,800 square feet of lot area.
Multiple-Family (R3-1)	Provide for multi-family residential units such that, after reaching 10 units on the first 14,200 square feet, there is not more than one dwelling unit for each additional 1,000 square feet.
Commercial Thoroughfare (CT)	Encourage a variety of mixed-use residential developments, including affordable housing development, that promote the economic and commercial success of Los Altos.
Commercial Neighborhood (CN)	Allow for a mix of pedestrian-scale commercial and residential uses while retaining and enhancing the neighborhood convenient character.
Commercial Retail Sales (CRS)	Retain and enhance the Downtown Los Altos village atmosphere and provide for a mix of uses emphasizing ground floor retail businesses and services with housing above.
Commercial Downtown (CD)	Provide for a full range of uses appropriate to Downtown while preserving and improving the character of the area immediately surrounding the existing Downtown pedestrian district.
Commercial Downtown/Multiple-Family (CD/R3)	Provide for a full range of retail, office, and service uses appropriate to Downtown while retaining and enhancing its village atmosphere.
Commercial Retail Sales/Office (CRS/OAD)	Provide for a full range of retail, office, and service uses appropriate to Downtown while encouraging pedestrian-scale design.
Public and Community Facilities/Single-Family (PCF/R1-10)	Provide for the construction, use, and occupancy of government, public utility, and educational buildings, as well as single-family detached homes on lots with a minimum site area of 10,000 square feet.
Source: City of Los Altos Municipal Code, Title 14 (Zoning)	

Development Standards

Development standards can constrain new residential development if the standards make it economically infeasible or physically impractical to develop a particular lot, or there are not suitable parcels which meet the development criteria for building form, massing, height, and density in a particular district.

Through its Zoning Code, the City enforces minimum site development standards for new residential uses. Table C-3 summarizes the basic standards for the City's districts that allow residential development.

Table C-3: Development Standards in Zones that Allow Residential Development

Zoning District	Min. Site Area (sq.ft.)	Max. Density (units/acre)	Max. Site Coverage	Max. Structure Height	Min. Setbacks (ft.)			FAR
					Front	Exterior Side	Rear	
R1-40	40,000 Corner: 41,000	1.1	20%	27 [1] Flag: 20	50	30	50	<11,000 sq.ft.: 35% >11,000 sq.ft.: 3,850 sq.ft. + 10% net lot area minus 11,000 sq.ft.
R1-20	20,000 Corner: 21,000	2.2	25%	27 [1] Flag: 20	30	25	35	
R1-H	20,000 Corner: 21,000	2.2	25%	27 [1] Flag: 20	30	25	50	
R1-10	10,000 Corner: 11,000 Flag: 15,000	4.4	35% 1-story 30% 2-story	27 [1] Flag: 20	25	20	25	
R3-5	43,560 (1 acre)	8.7	30%	30 or 2-story, whichever is less Within 100 ft. of R1-10: 15	40	15 Corner/abutting R1-10: 25	30 Abutting R1-10: 40	–
R3-4.5	9,000	9.7	40% of total gross site area where 1-story development does not exceed 20 ft.	20 2-story: 27	20-30 Abutting R1-10: 20			See R1 standard
R3-3	21,000	14.5	30%	30 or 2-story, whichever	40	15 Corner/abutting R1-10: 25	30 Abutting R1-10: 40	–

Table C-3: Development Standards in Zones that Allow Residential Development

Zoning District	Min. Site Area (sq.ft.)	Max. Density (units/acre)	Max. Site Coverage	Max. Structure Height	Min. Setbacks (ft.)			FAR
					Front	Exterior Side	Rear	
R3-1.8	Vacant: 7,100 Existing structures: 14,000	24.2	40%	is less Within 100 ft. of R1-10: 15	20	7.5 Corner: 15 Abutting R1-10: 25	30 Abutting R1-10: 40	–
R3-1	7,100	38.0	40%	35 or 3-story, whichever is less Within 100 ft. of R1-10: 30	20	7.5 Corner: 15 + 5 for each story above 1st or 10 ft. in height	25	–
CT	20,000	38.0	–	45	25	4 Across the street from an R district: 30 Abutting an R district, portion of structure ≤30 ft. in height: 40 Abutting an R district, portion of structure >30 ft. in height: 100	0 Across the street from an R district, ≤30 ft. in height: 30 Across the street from an R district, >30 ft. in height: 70 Abutting an R district, ≤30 ft.: 40 Abutting an R district, >30 ft. in height: 100	–
CN	–	–	–	30	If across a street from an R district: 40	0 Across the street from an R district: 40 Abutting an R district: 50	20	None; 35%: Woodland Plaza, Rancho Shopping Center
CRS	–	–	–	30	0	–	0	–

Table C-3: Development Standards in Zones that Allow Residential Development

Zoning District	Min. Site Area (sq.ft.)	Max. Density (units/acre)	Max. Site Coverage	Max. Structure Height	Min. Setbacks (ft.)			FAR
					Front	Exterior Side	Rear	
							Abutting a public parking plaza: 2 Abutting an alley: 10	
CD	–	–	–	30	2	0 Abutting a public street/parking plaza: 2	0 Structures >15 ft. in height: 15 Abutting a public street/parking plaza: 2 Abutting a public street/alley: 10	–
CD/R3	–	–	–	Entirely res. project: 35 MU projects: 30	Entirely res. projects: 10 MU projects: 2	0 Abutting a public street/parking plaza: 2	Entirely res. projects: 10 MU projects: 2	–
CRS/OAD	–	–	–	30	0	0 Abutting a public street/parking plaza: 2	0 Abutting a public parking plaza: 2 Abutting an alley: 10	–

" – " indicates a standard which was not specified in the Municipal Code.

[1] The maximum structure height may be limited to 20 feet or one story if subject to the Single-Story Single-Family Overlay District (R1-S).

Source: City of Los Altos Municipal Code, Title 14 (Zoning)

In addition to the residential and mixed-use districts described above, the City also has a Planned Community District (PC) and a Planned Unit Development (PUD) District. The PC District is intended to provide the long-term development of properties of at least 20 acres and requires approval of a master plan. The PUD District is intended to provide options for developments which confirm with the objectives of the Zoning Code but deviate in certain respects from the zoning standards. The PUD District is divided into five subdistricts, all of which allow residential uses. Table C-4, below, provides a summary description of development standards for these subdistricts.

Table C-4: Development Standards for Planned Unit Developments (PUDs)[1]

	PUD/RI Cluster	PUD/R	PUD/OA	PUD/C	PUD/SC
Permitted Residential Uses	Single-family dwellings	All permitted uses in R1-10/R3-5	All permitted uses in R1-10, R3-5, OA-1	All permitted uses in CN, CD, CRS, CT, OA-1, R1-10, R3-5	Housing and medical care facilities for senior citizens
Site Area	R1-10: 1 acre R1-H/R1-20: 2 acres R1-40: 5 acres	5 acres Frontage on Chester Circle: 3 acres			–
Standards	Development standards shall be no less than the maximum prescribed by the regulations for the zoning district which is comparable to the use proposed				

[1] All properties in the PC and PUD districts are built out.

Source: City of Los Altos Municipal Code, Title 14 (Zoning)

Development Standards Analysis

The basic development standards allow a moderate amount of density and intensity for residential development. The large-lot, single-family districts (R1-20, R1-H, and R1-40) are typically found in hillside areas just outside City limits (but within its sphere of influence) where steep slopes and other environmental constraints dictate larger lots, greater setbacks, and increased open space. Opportunities for denser housing are primarily located adjacent to the Downtown core and along El Camino Real on the City's northern border with Mountain View and Palo Alto.

Downtown

The CD/R3 District allows maximum structure heights comparable to the R3-1 and R3-1.8 districts and smaller setbacks. For mixed-use projects in the CD/R3 District, maximum structure heights are limited to 30 feet, slightly lower than entirely residential projects (35 feet), but with reduced setbacks comparable to adjacent commercial districts. This 30-foot height limitation is also applicable to other mixed-use districts (i.e., CD, CRS, CN).

Height limits in CD/R3 and CD districts were reduced in 2016 by Ordinance No. 2016-428. This Ordinance reduced allowed building heights from 45 feet to 30 feet for commercial or mixed-use

structures and reduced entirely residential building heights in the CD/R3 district from 45 feet to 35 feet. The passage of this Ordinance was contentious, with disagreement between the City's Downtown Buildings Committee (DBC), which recommended reducing height limits, and the Planning and Transportation Commission, which did not recommend reducing height limits. The City Council eventually voted 3-2 to reduce height limits.

The 30-foot height limit for mixed-use projects is a potential constraint to housing development, as when it is combined with the ground floor minimum interior ceiling height of 12 feet, vertical mixed-use projects are limited to only two stories. However, projects often receive a height concession resulting from adherence to the City's inclusionary housing requirements and as allowed through on-menu concessions (see later sections for Inclusionary Housing and Density Bonus and Incentives for Affordable Housing).

Height limits in all Downtown districts (i.e., CD/R3, R3-1, CD, CRS, and CRS/OAD) are also addressed by the 2018 Downtown Vision Plan (see "Specific Plans" above). Though the Downtown Vision Plan is a guiding document for the Downtown area, it explicitly discusses the community division over the topic of building heights along certain Downtown streets. In fact, community feedback recorded during deliberation over Ordinance No. 2016-428 also included comments to not reduce height limits until the visioning process (ongoing at the time) had concluded. Though "Downtown Districts" defined in the Downtown Vision Plan do not exactly align with Zoning Code districts, the Vision Plan recommends heights closer to those implemented before the 2016 Ordinance (e.g., maximum of 45 feet for mixed-use development on certain parcels in the CD/R3, CRS, and CD districts). To facilitate housing development Downtown, particularly in a mixed-use configuration, Program 3.B would result in amending the Zoning Code to implement an increase to building heights as recommended in the Downtown Vision Plan.

Commercial Neighborhood District

The 30-foot height limit also applies in the CN District. While there is no minimum ground floor ceiling height requirement in this District, only mixed-use projects are allowed, essentially limiting vertical mixed-use projects to only two stories[7]. As discussed above, although projects often receive a height concession, this height limit is a potential constraint to the development of residential mixed-use projects and would be evaluated and addressed through Program 3.B.

Specific floor area ratio (FAR) limitations apply to two areas in the CN District: Rancho Shopping Center and Woodland Plaza. In these two areas, the maximum FAR is 0.35, while no other properties in the CN District have an FAR limit. These two areas are currently occupied by single story commercial development with substantial surface parking. This FAR standard is a constraint on the development of housing in these areas and would be removed under Program 3.C.

[7] The Loyola Corners Specific Plan, which includes properties within the CN District, identifies a maximum height of 30 feet and two stories (Resolution 2017-41).

Commercial Thoroughfare District

The Commercial Thoroughfare (CT) District is located along El Camino Real with a maximum density of 38 units per acre and a maximum height of 45 feet. Development trends in this area are showing much higher densities and heights being built (see Appendix B, Table B-5). Furthermore, other mixed-use districts do not have maximum density standards, and heights across El Camino Real in Mountain View are up to 10 stories (i.e., Avalon Towers on the Peninsula). Therefore, to continue to facilitate housing in the CT District, the City will increase or remove the density maximum and evaluate increasing the height allowed in the CT District to ensure higher densities can be accommodated (Program 1.B).

Multi-Family Residential Districts

The multi-family residential zoning districts (R3) contain relatively restrictive standards, including maximum allowed site coverage (e.g., 30 percent of site area in some zoning districts) and building height (e.g., 20 feet or two stories in some zoning districts). These standards, particularly when considered cumulatively with parking requirements, create a challenge for projects to achieve maximum allowed density. The standards in the R3 zoning districts will be modified to facilitate higher density housing (Program 3.N). Parking standards will also be modified as described under Parking Requirements, below.

Parking Requirements

Required parking rates for residential uses in districts that allow residential are shown in Table C-5.

Table C-5: Residential Parking Rates

Zoning District	Required Spaces Per Dwelling Unit
R1-10, R1-20, R1-H, R1-40	2 spaces (1 covered)
R3-3, R3-4.5, R3-5	2 spaces (1 covered)
R3-1 [1]	
<2 rooms in addition to kitchens/bathrooms	1.5 spaces (underground)
2+ rooms in addition to kitchens/bathrooms	2 spaces (underground)
Visitor parking	1 space per 4 dwelling units
R3-1.8	
<2 rooms in addition to kitchens/bathrooms	1.5 spaces (1 covered)
2+ rooms in addition to kitchens/bathrooms	2 spaces (1 covered)
Visitor parking	1 space per 4 dwelling units
CN, CD, CD/R3, CRS/OAD, CRS, CT [2]	
<2 rooms in addition to kitchens/bathrooms	1.5 spaces
2+ rooms in addition to kitchens/bathrooms	2 spaces
Visitor parking [3]	1 space per 4 dwelling units

Table C-5: Residential Parking Rates

Zoning District	Required Spaces Per Dwelling Unit
Emergency shelters [4]	0.25 spaces per bed, 0.2 bike spaces per bed, 1 space per family room, 1 space per employee on duty

[1] Projects with a site area less than 30,000 sq. ft. may provide up to 50% of the required parking above-ground. The proposed parking plan shall be subject to the approval of the Commission and Council.

[2] For those properties which participated in a public parking district, no parking shall be required for the net square footage which does not exceed 100% of the lot area.

[3] Mixed use projects may substitute nonresidential parking spaces for visitor use in-lieu of providing dedicated visitor parking spaces, subject to approval of the Commission and Council.

[4] Only permitted in the CT and PUD/C zoning districts.

Source: City of Los Altos Municipal Code, Ch. 14.74 (Off-Street Parking and Loading)

Parking Requirements Analysis

The City provides a limited alternative to satisfying minimum parking requirements in Section 14.74.170 (Common Parking Facilities). Either through private agreement or by utilizing a public assessment district, a common parking facility may be used to satisfy the required area or number of spaces for each permitted use. The total number of spaces allocated cannot be less than the sum of the individual requirements and must be within 300 feet of the site of the permitted use(s). Planning and Transportation Commission approval is required for a common parking facility.

Public comments included that parking rates were a constraint to the development of housing, particularly in the Downtown area where lot sizes are smaller. To address parking constraints, a study should be conducted to identify parking management strategies for Downtown and assess and modify parking requirements citywide (Program 3.A). That assessment should evaluate reducing minimum required parking rates, offering higher rates of reduced parking for properties participating in a public parking district, establishing lower parking rates for small units (e.g., studios), providing more flexibility for underground parking, and other alternatives (e.g., in-lieu fees). Additionally, the City will assess parking requirements generally, including the required parking design dimensions (e.g., parking stall and lane dimensions), and modify those requirements where appropriate to reflect best practices and innovations in parking design. Furthermore, the City is working on a vehicle miles traveled policy and transportation demand management plan to promote efficient land use planning and facilitate alternative modes of transportation (Program 4.J).

Provisions for a Variety of Housing

The City has adopted provisions in its Zoning Code that facilitate a range of residential development types. Table C-6 provides a list of housing types and the zoning districts in which they are permitted, require a conditional use permit, or are not permitted.

Table C-6: House Types Permitted by Zoning District

Housing Type	Zoning Districts [1]																	
	R1-10	R1-H	R1-20	R1-40	R3-4.5	R3-5	R3-3	R3-1.8	R3-1	CN	CD	CRS	CT	CD/R3	CRS/OAD	PC	PCF	PCF/R1-10
Single-family residences	P	P	P	P	–	–	–	–	–	–	–	–	–	P	–	P	–	P
Accessory dwelling units (ADUs) [2]	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
Two-family dwelling units	–	–	–	–	P	–	–	–	–	–	–	–	–	P	–	–	–	–
Multi-family residential dwelling units	–	–	–	–	–	P	P	P	P	–	–	–	C	P	–	P [3]	–	–
Housing located above the ground floor	–	–	–	–	–	–	–	–	–	C	C	C	–	–	C	–	–	–
Mixed-use projects	–	–	–	–	–	–	–	–	–	C	–	–	C	–	–	–	–	–
Emergency shelters	–	–	–	–	–	–	–	–	–	–	–	–	P [4]	–	–	–	–	–
Single-room occupancy housing	–	–	–	–	–	–	–	–	–	–	–	–	C	–	–	–	–	–
Hospitals, convalescent hospitals, residential care homes, and nursing homes	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	P	C	C
Manufactured home	–	–	–	–	–	–	–	–	–	–	–	–	–	P	–	–	–	–

P = Permitted
C = Conditionally Permitted
– = Not Permitted/Not Specified

Table C-6: House Types Permitted by Zoning District

Housing Type	Zoning Districts [1]																	
	R1-10	R1-H	R1-20	R1-40	R3-4.5	R3-5	R3-3	R3-1.8	R3-1	CN	CD	CRS	CT	CD/R3	CRS/OAD	PC	PCF	PCF/R1-10

[1] See Table C-4 for allowed uses in PUD zoning districts.

[2] Pursuant to Chapter 14.14 (Accessory Dwelling Units), Section 14.14.030 (Location Permitted), ADUs may be permitted on parcels zoned for multi-family or single-family dwellings.

[3] Specific to senior citizen housing in the PC District.

[4] Also permitted in the PUD/C zoning district, where all uses permitted in the CN, CD, CRS, CT, OA-1, R1-10, and R3-5 districts are allowed. See Section 14.62.040 (Permitted Uses (PUD)) and Table C-4 above.

Source: City of Los Altos, Title 14 (Zoning)

Multi-Family

Multi-family dwellings are permitted in the R3-4.5, R3-5, R3-3, R3-1.8, R3-1, and CD/R3 zoning districts on properties that meet the site development standards described in Table C-3. Standalone multi-family dwellings are allowed with a conditional use permit in the CT District, and residential mixed-use is allowed with a conditional use permit in the CN, CD, CRS, CT, and CRS/OAD zoning districts. To facilitate housing, the City will amend the Zoning Code to allow the following as permitted uses (Program 3.F):

- Residential mixed-use in the CN, CD, CRS, CT, and CRS/OAD districts; and
- Multi-family in appropriate areas of mixed-use districts (e.g., not on the ground floor, etc.).

The City has a condominium conversion ordinance (Chapter 14.26) for the purposes of maintaining an adequate supply of rental housing and reducing the displacement of long-term residents, particularly senior citizens. Chapter 14.26 prohibits existing apartments from being converted into condominiums unless the number of apartment units being offered for rent or lease in the city is equal to or less than five percent of the total number of apartment units in the city. As noted in Appendix A, Needs Assessment, the rental vacancy rate in Los Altos remains below five percent (3.1 percent).

Accessory Dwelling Units (ADUs)

Zoning Code Chapter 14.14 (Accessory Dwelling Units) provides supplemental standards for ADUs and Junior ADUs. These standards were adopted October 27, 2020 to reflect current State law. The City prohibits the use of ADUs as short-term rentals and, as indicated in State law, requires a rental period of greater than 30 days. A restrictive covenant is required to be recorded against a lot containing an ADU to address the restrictions and regulations established in Chapter 14.14. Additionally, while the Code identifies that the City will conduct annual ADU rental income surveys whereby each property owner may voluntarily share the rental income for the unit for the City to use in its annual progress reports (Section 14.14.090), this has not been conducted; the City will conduct these surveys consistent with Program 2.E.

The City complies with State law for processing times related to ADUs (i.e., within 60 days or less). On its website, the City provides an informative four-page handout describing ADU standards, a zoning clearance application/checklist, and a link to an “ADU calculator” that helps homeowners estimate the cost of converting part of their home into (or constructing) an ADU. However, public comments identified that the ADU process should continue to be streamlined, and Program 2.D would result in continued facilitation and streamlining of ADUs.

Emergency Shelters/Low Barrier Navigation Centers

The Zoning Code defines “emergency shelter” as housing with minimal supportive services for homeless persons, pursuant to Health and Safety Code §50801, that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay.

Emergency shelters are allowed by right in the CT and PUD/C zoning districts provided they meet the site development standards in Table C-3 (if in the CT District), Table C-4 (if in the PUD/C District), and the parking requirements in Table C-5. No additional standards are imposed, nor does the City apply any of the objective development/management standards allowed by State law (e.g., maximum number of beds, proximity to other shelters, etc.).

Although emergency shelters are not currently exempt from design review (see Section C.2.4), the City's adoption of objective design standards in 2021 (see Zoning Code Section 14.66.280) and the implementation of Program 3.H will ensure emergency shelters are permitted without any discretionary actions or exceptions.

The CT and PUD/C zoning districts are located on the northern edge of the City along El Camino Real (i.e., the northernmost portion of Los Altos), and accessible by San Antonio Road. The above-described areas are serviced by the Santa Clara Valley Transportation Authority, which provides bus service throughout Santa Clara County, including Los Altos. These areas have access to Bus Routes 22, 40, and 522, which operate throughout the day from morning until night, including weekends and holidays. These routes include multiple bus stops, particularly along El Camino Real and San Antonio Road, and provide access to schools, churches, retail, groceries, and medical care.

Twelve parcels in the CT District are included in the sites inventory as underutilized/nonvacant sites for housing development over the planning period (see Appendix B, Sites Inventory & Methodology). One of these parcels is also zoned PUD/C with an underlying zoning of CT (APN 16712047, 4546 El Camino Real). These parcels comprise approximately 8.5 acres of largely surface parking and commercial buildings, with individual parcels ranging from 0.20 acres (13,500 square feet) to 1.69 acres and a median parcel size of 0.59 acres. As described in Section B.2.5 (Suitability of Nonvacant Sites) in Appendix B, these parcels are underutilized with primarily surface parking and commercial buildings where the existing uses are of lower economic viability and buildings are largely single story, providing opportunity for additional development, reuse, and/or redevelopment.

According to the 2019 Point-in-Time (PIT) count, there were an estimated 76 persons experiencing homelessness in Los Altos. Conservatively assuming 600 square feet per bed, 45,600 square feet of floor area would be required to house 76 people experiencing homelessness. The CT District has no maximum site coverage or FAR but allows buildings up to 45 feet in height. The aforementioned housing sites in the CT District total approximately 8.5 acres (i.e., 370,000 square feet) and have sufficient capacity to accommodate the square footage for an emergency shelter(s) housing up to 616 people.

Government Code §65583(a)(4)(A) requires emergency shelters to provide sufficient parking to accommodate all staff working in the shelter, provided the standards do not require more parking than other residential or commercial uses in the same zone. As shown in Table C-5, the City requires emergency shelters to provide off-street parking at the rate of 0.25 parking spaces per bed, 0.2 bike spaces per bed, one parking space per family room, and one parking space per

employee on duty. These requirements are comparable to or less than those required of other residential uses in the CT District, as shown in Section 17.74.080 (Residential Uses in CN, CD, CD/R3, CRS/OAD, CRS and CT Districts). Under Program 3.M, the City will amend the number of parking spaces required to be consistent with State law (i.e., only require the parking necessary for emergency shelter staff).

Additionally, the Zoning Code does not address low barrier navigation centers (LBNCs), defined as Housing First, low-barrier, service enriched shelters focused on moving people into permanent housing that provide temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing (Government Code §65660). State law requires LBNCs to be permitted by-right in areas zoned for mixed-use and nonresidential zones permitting multi-family uses provided they comply with the provisions establish by AB 101 (Government Code §65662) (e.g., CD/R3, CN, CD, CRS, CT, CRS-OAD districts). Program 4.C requires the Zoning Code to be amended to allow LBNCs in the appropriate zones consistent with AB 101.

Transitional Housing and Supportive Housing

In addition to emergency shelters, transitional housing is a type of housing used to further facilitate the movement of homeless individuals and families to permanent housing. It can serve those who are transitioning from rehabilitation or other types of temporary living situations (e.g., domestic violence shelters, group homes, etc.). Transitional housing can take several forms, including group quarters with beds, single-family homes, and multi-family apartments, and typically offers case management and support services to return people to independent living (usually between six and 24 months). Transitional housing is defined in Government Code §65582(j) as buildings configured as rental housing development but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months.

Supportive housing is defined in Government Code §65582(g) as housing with no limit on length of stay, that is occupied by the target population, and that is linked to an on-site or off-site service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.

Transitional and supportive housing must be allowed in all zones that allow residential uses and subject to the same development standards that apply to other residential uses of a similar type within these zones. Furthermore, AB 2162 (Government Code §65650-65656) requires supportive housing to be allowed by-right in zones where multi-family and mixed-uses are permitted, including nonresidential zones that allow multi-family uses, if the proposed development meets certain criteria (e.g., deed restricted for 55 years to lower income households, serving “target population” of homeless individuals, minimum area dedicated for supportive services, etc.).

The City does not currently allow transitional and supportive housing in any zoning districts. Although the 5th Cycle Housing Element Program 3.2.2 directed the City to amend the Zoning

Code to define and permit these uses, this has not been completed. The City will amend the Zoning Code to allow such uses consistent with State law (see Program 4.D).

Employee Housing

Health and Safety Code §17021.5 requires employee housing (also called farmworker housing) for six or fewer persons to be treated as a single-family structure and residential use. Section 17021.6 requires that employee housing consisting of no more than 36 beds in group quarters designed for use by a single family or household to be treated as an agricultural use. No conditional use permits, zoning variances, or other zoning clearance are to be required.

The City does not currently allow employee housing in any zoning district. Although the 5th Cycle Housing Element Program 2.1.3 directed the City to amend the Zoning Code to allow employee housing, this has not been completed. Program 4.E is included to amend the Zoning Code to reflect State law provisions for employee housing.

Single-Room Occupancy (SROs)

A single-room occupancy (SRO) unit is considered a small, affordable housing unit that can serve as an entry point into more stable or long-term housing for people who previously experienced homelessness. The City defines SROs as a residential project with small units between 150 and 350 square feet each, with or without integral bathroom and/or kitchen facilities.

The Zoning Code allows SRO units in the CT and PUD/C districts with a conditional use permit. See Emergency Shelters/Low Barrier Navigation Centers, above, for a discussion of suitability of the CT District for housing development. Also, see Section C.2.4 (Permit and Procedures) for a discussion of the conditional use permit process and required findings. Although the City does not currently have any procedures to encourage SROs, programs are proposed to facilitate their development, including modifying parking standards (Program 3.A) and amending conditional use permit findings (Program 3.G).

Manufactured and Mobile Homes

Though the City does not contain existing mobile home parks, mobile and manufactured homes can be an important source of housing choice and affordability. As manufactured homes that meet certain requirements must be permitted in mobile home parks and are frequently regulated by jurisdictions together, they are discussed here jointly.

Government Code §65852.3 requires cities to allow and permit manufactured and mobile homes on a permanent foundation in the same manner and in the same zone as a conventional stick-built structure, subject to the same development standards that a conventional single-family home on the same lot would be subject to.

While it is the City's practice to treat manufactured homes on a foundation as a conventional single-family home (consistent with Government Code §65852.3), the Zoning Code does not reflect this practice. The sole reference to manufactured homes is located in Chapter 14.14

(Accessory Dwelling Units), where manufactured homes are identified as being included in the Code's definition of an ADU.

Under Program 3.J, the City will amend the Zoning Code to clarify compliance with State law and explicitly allow manufactured homes on a permanent foundation, subject to the same regulations as single-family homes.

Residential Care Facilities

State law requires local governments to treat licensed residential care facilities (sometimes called group homes) with six or fewer residents as a residential use and subject to the same development standards as a single-family dwelling (Health and Safety Code §1566.3). Furthermore, no conditional use permit, zoning variance, or other zoning clearance shall be required of a residential facility that serves six or fewer persons that is not required of a family dwelling of the same type in the same zone. The residents and operators of a residential care facility shall be considered a family for the purposes of any law or zoning ordinance that relates to the residential use of property. However, "six or fewer persons" does not include the operator, operator's family, or persons employed as staff.

The City defines a residential care home as a structure in which nonmedical services are provided for persons 60 years of age and over, pursuant to Health and Safety Code §1569.2. As shown in Table C-6, the Zoning Code includes residential care homes as part of a collective use designation for "Hospitals, convalescent hospitals, residential care homes, and nursing homes." This designation is permitted by right in the PC District and requires a conditional use permit in the PCF and PCF/R1-10 zoning districts.

To facilitate compliance with State law, the current collective use designation should be separated into individual uses: residential care facility (six or fewer persons), residential care facility (seven or more persons), and other medical facility designations as desired. Consistent with State law, the Zoning Code should be amended to permit residential care facilities for six or fewer persons in all residential districts, as well as districts where single-family homes are allowed by right, and treat them as a residential use. While the City may require a conditional use permit for large residential care facilities (seven or more persons), all residential care facilities should be processed without discretionary review (i.e., subject only to objective standards). Additionally, residential care facilities should not be limited to individuals of 60 years of age or over. These changes are included in Program 3.I.

The City does not currently define a "family" as including unrelated individuals living as a single unit, which may unnecessarily limit the operation of residential care facilities. Program 3.I directs the City to add a barrier-free definition of "family" that encompasses unrelated individuals living together as a single residential unit.

Housing for Persons with Disabilities

Persons with disabilities normally have certain housing needs that include accessibility of dwelling units, access to transportation, employment, and commercial services; and alternative living arrangements that include on-site or nearby supportive services. The Lanterman Developmental Disabilities Services Act (§5115 and §5116) of the California Welfare and Institutions Code declares that mentally and physically disabled persons are entitled to live in normal residential surroundings. This classification includes facilities that are licensed by the State to provide permanent living accommodations and 24 hour, primarily non-medical care and supervision for persons in need of personal services, supervision, protection, or assistance for sustaining the activities of daily living. It includes hospices, nursing homes, convalescent facilities, and group homes for minors, persons with disabilities, and people in recovery from alcohol or drug addictions.

The City ensures that new housing developments comply with California building standards (Title 24 of the California Code of Regulations and the Americans with Disabilities Act (ADA)) and federal requirements for accessibility. Also, per Table C-5 above, there are no parking reductions for housing types for persons with disabilities. Program 3.A directs the City to amend the Zoning Code to include parking reductions for housing for persons with disabilities, seniors, and other housing types which may not require the standard number of spaces.

Reasonable Accommodation

Both the federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning laws and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be reasonable to accommodate requests from persons with disabilities to waive a setback requirement or other standard of the Zoning Code to ensure that homes are accessible for the mobility impaired. Whether a particular modification is reasonable depends on the circumstances.

The Zoning Code does not currently contain procedures for reasonable accommodations. Under Program 4.F, the City will adopt reasonable accommodation procedures compliant with State law.

Density Bonus and Incentives for Affordable Housing

Section 14.28.040 (Density Bonuses) provides density bonus provisions pursuant to State Density Bonus requirements (Government Code §65915 et seq.) to increase the production of affordable housing. Developments identified in this Section are eligible for density bonuses and/or incentives, as well as parking requirement alterations and waivers. The percentage density bonus and number of incentives granted varies based on development type and the percentage of affordable units constructed. Density bonuses and incentives are also available for developments which provide housing for transitional foster youth, disable veterans, or homeless persons; include a childcare facility; convert apartments into condominiums; and for residential projects that include the donations of land for the construction of very low-income housing.

Subsection F provides incentive standards and a list of "On-Menu" incentives that the Council has determined would not have a specific, adverse impact. These incentives are:

- A 20 percent increase in lot coverage limits;
- A 20 percent decrease in lot width requirements;
- Up to a 35 percent increase in the maximum floor area ratio for applicable zoning districts;
- Up to an 11-foot increase in allowable height;
- Up to a 20 percent decrease in required setbacks (except for properties abutting R1 zoned properties); and
- Up to a 20 percent decrease from open space requirements.

An applicant may request an "Off-Menu" incentive not included above, so long as the incentive meets the definition under State law. The review authority will determine whether any such requested incentive may have a specific, adverse impact.

These provisions were most recently updated in 2019. In 2020, the adoption of AB 2345 increased the allowed density bonus from 35 percent to 50 percent for qualifying development projects and altered a variety of minor density bonus requirements. Program 3.E directs the City to amend the Zoning Code to update its density bonus provisions to be in compliance with State law.

Inclusionary Housing

Inclusionary Housing Provisions

The City provides for the development of affordable housing for lower-income households in Chapter 14.28 (Multiple-Family Affordable Housing). This Chapter utilizes inclusionary housing policies, requiring 15 percent of the total units in multiple-family residential projects of five to nine units (both rental and for-sale) to be designated as affordable at the moderate-, low-, or very low-income level. For rental projects of 10 or more units, either 20 percent of the units must be designated as affordable at the low-income level or 15 percent at the very low-income level. For-sale projects of 10 or more units must designate 15 percent of units as affordable, with a majority affordable at the moderate-income level and the remaining units at the low- or very low-income level. Unless otherwise approved by the Council, affordable units must be dispersed throughout the project, constructed concurrently with market rate units, and shall not be significantly distinguishable by size, design, construction, or materials.

Though the primary emphasis of these provisions is for affordable units to be constructed in conjunction with market rate units within the same project, this may not always be practical. As an alternative to providing the required affordable housing units, Section 14.28.020 (Applicability) indicates that payment of an in-lieu fee is permitted for projects with five to nine units. Municipal Code Chapter 3.49 (Affordable Housing Impact Fees) establishes provisions for the calculation and payment of this fee.

Municipal Code Chapter 3.49 (Affordable Housing Impact Fees) requires the payment of housing impact fees for all new for-sale residential developments, multiple-family residential rental developments, and non-residential developments that result in a net increase of one unit or more (for residential projects) or 500 square feet or greater of new floor area (for non-residential projects). It also provides further alternatives to the on-site provision of affordable units beyond the payment of a housing impact fee, including the designation of affordable units at an off-site location or the dedication of land within City limits for the construction of affordable units. However, the City has not adopted a resolution establishing the amount of an affordable housing impact fee. Under Program 2.B, the City will conduct an analysis to support the establishment of an affordable housing in-lieu fee for residential developments and a commercial linkage fee for affordable housing.

Inclusionary Housing Analysis

The City has implemented inclusionary housing requirements since 1995. Since that time, Los Altos has continued to experience new development and housing production. Between 2015 and 2020, 114 new housing units were issued permits in Los Altos; of these, 111 were above moderate units, one was moderate income units, two were low-income units, and none were very low-income units (see Appendix A, Housing Needs Assessment, Table A-13). In 2021, 119 new housing units were issued permits, consisting of 58 above moderate units, 37 moderate income units, 21 low-income units, and three very low-income units. While this is just over half of the City's overall 5th Cycle Regional Housing Needs Allocation (RHNA) (477 total units), permitting substantially increased in 2021, and continued growth is expected due to a strong pipeline of entitled and proposed developments (see Appendix B, Table B-3).

To ensure effectiveness of the inclusionary housing ordinance in meeting the City's Housing Element's goals and objectives, the City will evaluate the inclusionary housing requirements (e.g., 15 to 20 percent inclusionary rates) as described in Program 2.A.

Other Local Ordinances

Municipal Code Chapter 14.30 (Short-Term Rental Prohibition) establishes regulations to maintain adequate housing stock for permanent residents and prevent undesirable impacts associated with short-term rentals. This Chapter designates short-term rentals as a prohibited use in every district in the city.

In 2021, the City adopted a resolution amending the City's Single-Family Residential Design Guidelines to establish objective design standards for SB 9 lot splits and units. These standards do not preclude the construction of two 800 square foot minimum primary dwelling units consistent with SB 9. The City has prepared a handout to clearly identify SB 9 project application requirements.

The City does not have other ordinances, such as growth management policies or an urban growth boundary, that directly impact the cost and supply of residential development.

C.2.3 Building and Housing Codes and Enforcement

Los Altos has adopted the 2019 California Building Standards Code (Code of Regulations, Title 24), which sets minimum standards for residential development and all other structures. The standards may add material and labor costs but are necessary minimums for the safety of those occupying the structures. The City has also adopted the 2019 editions of the State's Administrative Code, Residential Code, Plumbing Code, Mechanical Code, Electrical Code, Energy Code, Fire Code, Green Building Standards Code, Existing Building Code, Historical Building Code, and Referenced Standards Code. In addition, the City has adopted the 1998 edition of the State's Uniform Housing Code and Uniform Code for the Abatement of Dangerous Buildings. All codes listed above are referenced in Title 12 (Buildings and Construction) of the Municipal Code.

In many cases, various amendments to the State Code have been incorporated to reflect issues of local concern. Most recently, the City adopted amendments to Title 12.22 (Energy Code) for all-electric buildings pursuant to State law, which allows local governments to adopt energy standards that are more stringent than Statewide standards, provided they are cost effective and will result in designs that consume no more energy that that permitted under the 2019 California Energy Code. These amendments were adopted to further greenhouse gas emission reduction goals established in the City's Climate Action and Adaptation Plan. Specifically, these amendments require newly constructed buildings to be all-electric or to be pre-wired to accommodate future electric appliances or equipment. These standards may increase initial construction costs, but over time will benefit the health, welfare, and resilience of current and future residents.

The City's Code Enforcement Division, within the Los Altos Police Department, enforces the Los Altos Municipal Code. The City's Code Enforcement Division enforces the Los Altos Municipal Code. Code enforcement practices are primarily complaint-driven, and Code Enforcement Staff works with property owners and other appropriate City staff to resolve and legalize violations. This includes identifying housing units which are substandard, overcrowded, or unsafe and working with other City staff to remedy these deficiencies. By requiring repair, maintenance, and compliance with building and fire codes and zoning requirements (e.g., setbacks), the City's code enforcement efforts have eliminated hazardous conditions which are a threat to housing and residents of all income levels. From 2015 to 2020, the City has received and closed five code enforcement cases related to substandard housing (see Appendix A, Section A.4.4). The impact of these efforts on housing safety and maintaining decent housing conditions is significant even if only few issues are address every year.

C.2.4 Permits and Procedures

Permits and Procedures

The time required to process a project varies from one entitlement to another and is directly related to the size and complexity of the proposal, as well as the number of actions or approvals needed to complete the process. Table C-8 identifies approvals and/or permits that could be required for residential planning entitlements, their corresponding approval body, and the typical or estimated approval timeline. It should be noted that every project would not have to obtain each permit/approval.

Table C-8: Typical Approval Timelines

Permit/Procedure Type	Review Authority	Typical Processing Time	
		Non-Complicated Project	***Complicated Project***
Conditional Use Permit	Planning Commission/City Council	2-4 months	4-6 months
Design Review (one story)	City staff	2-3 months	3-4 months
Design Review (two story)	Design Review Commission	3-4 months	4-6 months
Tentative Map	Planning Commission	4-6 months	6-8 months
Parcel Map	Planning Commission	4-6 months	6-8 months
Multi-family (<20 units)	Planning Commission/City Council	6-9 months	9-12 months
Multi-family (>20 units)		9-12 months	12-18 months

Note: All other permit/approvals are assumed to be subject to a Mitigated Negative Declaration/Negative Declaration or lower-level environmental review.

Source: City of Los Altos, Title 14 (Zoning)

The average time for a new single-family home to be approved is six months, which typically includes design review approval with an average of three hearings. The average time for a new multi-family development to be approved is 12 to 14 months, which typically includes approval by the Complete Streets Commission, Planning Commission, and City Council (an average of four hearings). As analyzed and discussed below, various programs are included to reduce processing time and streamline approvals, including the development of standards conditions of approval to provide certainty to applicants and approval bodies (e.g., Programs 3.H and 3.K).

Additionally, the time lapse between project approval and application for building permit varies widely. In the past five years, several multi-family developments have experienced lapses of only six months or less. For example, a three-story, 10-unit multi-family development at 385 First Street was approved on July 9, 2019 and submitted for building permit on December 16, 2019. However,

several larger projects have seen lapses of a year or more. For example, a 196-unit multi-family development (including multiple structures, underground parking, and 28 affordable units) at 5150 El Camino Real received planning approval on December 10, 2019 and has yet to receive a building permit, a lapse of 26 months and counting[8]. Though more complex projects may take a longer period to prepare a full set of plans, similar lapses have been observed for smaller projects.

Conditional Use Permit

Zoning Code Chapter 14.80 establishes the applicability and process for conditional use permits (CUPs). The Planning Commission must review all CUPs at a public hearing and is the final decision-making body for CUP applications in all OA and C districts for businesses proposed in existing structures. However, as noted below in "Design Review," any project in a non-single-family district that includes exterior alterations, an addition, or new construction is subject to commercial and multi-family Design Review approval, potentially requiring City Council approval.

Regardless of the final decision-making body, CUP approval is subject to the findings listed in Zoning Code Section 14.80.060. These include typical findings, such as consistency with the General Plan and not detrimental to the public health, safety, and welfare, as well as specific findings for projects located in the certain zoning districts. Program 3.G requires that any findings applicable to housing developments, including single-room occupancy units, be limited to objective findings and standards consistent with State law.

Planned Unit Development (PUD)

To provide options for developments which confirm with the objectives of the Zoning Code but deviate in certain respects from the zoning standards, a property owner may, at their discretion, petition for the approval of their project as a PUD alongside an application for a CUP. In no case are PUDs mandatory in Los Altos.

Described in Zoning Code Section 14.62.130, this process requires the submission of a tentative plan describing the basis for the PUD and proposed development standards and regulations. A conditional use permit is required as part of a PUD application. After an application has been filed, the Planning Department reviews the application and prepares a staff report to be considered during a public hearing before the Planning Commission. The Commission may recommend approval to the City Council, in which case the Council may accept, modify, or reject during a subsequent public meeting. If the Commission denies the petition, their decision is final unless the applicant appeals to the Council.

[8] The 5150 El Camino Real property was sold, and the new developer is amending the project to change from ownership to rental and other modifications. This has resulted in the time lapse between original approval and building permit submittal.

Design Review

Design Review applies to all new construction, additions, and exterior modifications, separated into two categories: 1) single-family residential; and 2) commercial, multi-family residential, and public/community facility.

Single-Family Design Review

Projects that include exterior alterations, additions, or new construction in a single-family (R1) district are subject to the City's Residential Design Guidelines, located in Zoning Code Chapter 14.76. Exterior alterations and additions under 500 square feet can be approved by the Planning Department. New houses and additions greater than 500 square feet require administrative design review approval by the Development Services Director. Design Review approval by the Design Review Commission is required in certain cases, including any of the following:

- Any new two-story structure;
- Any conversion of a one-story structure to a two-story structure;
- Any addition of habitable area to the second floor of an existing two-story structure; or
- Any new one-story structure over 20 feet in height; etc.

The required findings for single-family residential design review approval include some subjective criteria, including the following (Zoning Code Section 14.76.060):

- The height, elevations and placement on the site of the proposed main or accessory structure or addition, when considered with reference to the nature and location of residential structures on adjacent lots, will avoid unreasonable interference with views and privacy, and will consider the topographic and geologic constraints imposed by particular building site conditions.
- The orientation of the proposed main or accessory structure or addition in relation to the immediate neighborhood will minimize the perception of excessive bulk.
- General architectural considerations, including the character, size, scale and quality of the design, the architectural relationship with the site and other buildings, building materials and similar elements have been incorporated in order to insure the compatibility of the development with its design concept and the character of adjacent buildings.

Under Program 3.H, the City will review and approve more projects at the staff level by eliminating the Design Review Commission. This will reduce the number of meetings and approval time for various projects, including some single-family homes currently requiring Design Review Commission approval. Also, see further discussion below.

Multi-Family and Mixed-Use Design Review

Any project in a non-single-family district that includes exterior alterations, an addition, or new construction is subject to commercial and multi-family design review approval, located in Zoning

Code Chapter 14.78. A project that includes alterations or an addition of under 500 square feet is subject to Development Services Director approval. A project that includes an addition of greater than 500 square feet (but less than 50 percent of total floor area and does not increase building height) is subject to Planning Commission approval. All new buildings and additions that exceed 50 percent of total floor area and/or increase building height are subject to City Council approval, preceded by Planning Commission and Complete Streets Commission review and recommendation.

In most cases (except Accessory Dwelling Units and SB 9 Projects), multi-family residential and residential mixed-use projects, and single-family projects, are subject to Administrative Design Review (City staff review), Design Review Commission, Planning Commission, Complete Streets Commission, and City Council approval through conditional use permit and/or design review requirements, resulting in an extended review process. When required, final approval or concurrence by the City Council adds an additional review within the process. In addition to this, projects in the Downtown are also subject to a third-party independent architect review, adding further cost and time to review.

The City adopted a set of objective design standards applicable to all multi-family and mixed-use development in 2021 (Zoning Code Section 14.66.280 and provisions for Design Control application to specific zones). However, the required findings for multi-family and mixed-use design review approval include some subjective criteria, including the following (Zoning Code Section 14.78.060):

- The proposal has architectural integrity and has an appropriate relationship with other structures in the immediate area in terms of height, bulk and design.
- Building mass is articulated to relate to the human scale, both horizontally and vertically. Building elevations have variation and depth and avoid large blank wall surfaces. Residential or mixed-use residential projects incorporate elements that signal habitation, such as identifiable entrances, stairs, porches, bays and balconies.

While Senate Bills 35 (Streamlined Approval Process) and 330 (Housing Accountability Act) limit the number of public hearings and applicability of subjective standards and findings to housing developments and emergency shelters, the City's review procedures and subjective findings can lead to a protracted review process. Therefore, under Program 3.H, the City would modify design review thresholds to reduce or eliminate Council approval (i.e., Council would only hear appeals) and ensure that only objective criteria and findings are applicable to housing developments and emergency shelters consistent with State law. Also, under Program 3.K, the City would develop multimodal transportation development standards that will also streamline the project review process.

Furthermore, as part of the Design Review process, story poles are required to be installed for all multi-family, mixed-use, and commercial development projects unless an exception is approved by City Council. This requirement can extend project review and increase application processing

costs. Furthermore, digital simulations and computer modeling provide more accurate visual representations of development projects, illustrating massing, design, and details not available through physical story poles. The City also has the discretion to require additional information for projects that are not consistent with the City's General Plan and Zoning Code; therefore, the City would eliminate the story pole requirement and exception process (Program 3.L).

SB 35 Processing

The City has prepared an SB 35 eligibility checklist and submittal checklist to clearly outline requirements for these projects. The City processes SB 35 applications in compliance with State law and HCD guidelines.

Permit and Development Fees

The City requires payment of application fees for entitlement processing and development fees at time of building permit issuance. City fees are based on the City's costs of providing services and are reviewed and adjusted periodically. The City's permit and development fees are available on the City's website consistent with transparency requirements (i.e., Government Code §65940.1(a)(1)(A)).[9]

Planning Fees

Table C-9 lists the City's Planning Fees.

[9] City of Los Altos, Fee Schedule, https://www.losaltosca.gov/adminservices/page/fee-schedule.

Table C-9 Planning Department Fee Schedule

Service	Fee
Conditional Use Permit	
New Construction (>500 sq. ft.) [PC&CC]	$5,350
Design Review	
Single-Family	
Administrative (≤500 sq. ft.)	$295
Administrative (>500 sq. ft.)	$890
Design Review Commission	$1,785
Commercial/Multiple-Family	
Administrative (≤500 sq. ft.)	$890
PC & CC (>500 sq. ft.)	$5,350
Accessory Dwelling Unit Review	$595
Environmental Initial Study	$1,785 + Time/Material
Environmental Impact Report	$5,350 + Time/Material
General Plan/Map Amendment	$5,350 + Time/Material
Lot-Line Adjustment	$1,785 + Time/Material
Planned Unit Development	$5,350 + Time/Material
Preliminary Project Review	$295
Tentative Subdivision Map Review	$5,350
Variance Review	
Single-Family (Main Structure)	$1,785
Commercial/Multiple-Family [PC Only]	$1,785
Commercial/Multiple-Family [PC & CC]	$5,350
Zoning Ordinance/Map Amendment	$5,350 + Time/Material
Source: City of Los Altos Fee Schedule (FY 2018/19)	

Development Fees

The City imposes development fees and collects fees for outside agencies. Outside agency fees include the Los Altos Unified School District.

Table C-10 provides a comprehensive list of the City's Development Fees.

Table C-10: Development Fees

Development Fee	Single-Family	Multi-Family
Park In-Lieu Fee[1]	$77,500 per unit	$48,800 per unit
Traffic Impact Fee	$6,774.20 per unit	$4,159 per unit $1,744.20 per senior residential unit
Los Altos Unified School District Fee*	$2.72 per s.f.	

[1] Applicable to subdivisions (i.e., tract or parcel maps)
** Outside agency fee.*
Source: City of Los Altos

Fee Analysis

Table C-11 shows total estimated planning and development fees for single-family and multi-family units, as well as the estimated fee cost as a portion of total development costs.

Table C-11: Planning and Development Fees for Single-Family and Multi-Family

	Single-Family[1]	Multi-Family (50 condo units, market rate)[2, 3]	Multi-Family (100 rental units, affordable)[2]
Design Review	$1,785	$5,350	$5,350
Tentative Map	-	$5,350	-
Park-In Lieu	$77,500	$2,440,000	-
Traffic Impact	$6,774	$207,950	$415,900
School District Fee*	$9,520	$136,000	$272,000
Total Fees	**$95,579**	**$2,794,650**	**$693,250**
Total Fees per Unit	**$95,579**	**$55,893**	**$6,933**
Total Estimated Development Cost	$1,833,729	$31,087,378	$43,058,300
Total Estimated Development Cost per Unit	$1,833,729	$621,748	$430,583
Estimated Fee Cost as a Portion of Total Development Cost	**5%**	**9%**	**2%**

[1] Assumes a 3,500 square foot house with a 2-car garage.
[2] Assumes 1,000 square foot units.
[3] Assumes public art requirement is provided on-site.
** Outside agency fee.*
Source: City of Los Altos, LWC

Development fees add to the cost of housing and can constrain housing development if the cost of development exceeds the threshold for financial feasibility. The Park In-Lieu fee is the most substantial fee, which is higher compared to the City of Palo Alto's Park Impact Fee of $62,039 per single-family unit and $45,884 per multi-family unit, but comparable to the City of Mountain View's park land dedication in-lieu fee (see Table C-12). Table C-12 compares the City's development impact fees to the neighboring jurisdictions of Mountain View and Palo Alto (excluding outside agency fees). The City's overall impact fees are similar to Mountain View and Palo Alto's overall impact fees. As reviewed by the Terner Center in a March 2018 report, the

City's processing fees represent reasonable costs; however, Program 3.D will result in further evaluation and adjustments to City fees as described below.[10]

Table C-12: Development Impact Fees Comparison [1]

Development Fee	Los Altos	Mountain View	Palo Alto
Parks	Single-family: $77,500 Multi-family: $48,000	Based on land value (in FY 21/22 fee ranges between $57,500 to $73,200 per market rate unit)	Single-family: $62,039 Multi-family: $45,884
Transportation/ Traffic	Single-family: $6,744 Multi-family: $4,159 Senior: $1,744	Single-family: $5,364 Multi-family: $3,004	Single-family: $9,266 per net new PM peak hour trip
Community Facilities [2]	–	–	Single-family: $10,309 Multi-family: $7,797
Housing	–	–	Apartment (rentals): $24.52 per sf

[1] All fees are per dwelling unit unless otherwise noted.

[2] For Palo Alto, includes impact fees for community centers, libraries, public safety facilities, and general government facilities.

Source: City of Los Altos, City of Mountain View, City of Palo Alto

Existing City impact fees (park in-lieu and traffic) are applied on a per-unit basis and are higher for single-family houses than for market-rate multi-family units (assumed to be condominium units, subject to the park in-lieu fee). However, despite this difference, impact fees make up a greater portion of multi-family development costs because single-family houses are much larger than multi-family units as per-unit fees incentivize larger unit sizes. Therefore, the City will evaluate refining fees to be applied on a per square foot basis rather than per unit to encourage the development of smaller, more affordable housing units (Program 3.D).

C.2.5 On and Off-site Improvements

New development is required to provide public improvements to serve its new residents consistent with City standards. Design and improvement standards are described in Municipal Code Chapter 13.20 (applicable to subdivisions) and the City's Public Works Standard Guidance Specifications (applicable to improvements in the public right-of-way or easements). Public improvement obligations include providing streets, storm drains, sewer connections, water connections, fire hydrants, street lights, and street trees. Required street right-of-way widths are based on street classification and range from 20 feet (private street) to 120 feet (major thoroughfares) (Municipal

[10] UC Berkeley, Terner Center for Housing Innovation. "It All Adds Up: The Cost of Housing Development Fees in Seven California Cities". March 2018. https://ternercenter.berkeley.edu/wp-content/uploads/pdfs/Development_Fees_Report_Final_2.pdf

Code 13.20.010.D). The required improvements are typical for new residential development; however, the City allows many single-family neighborhoods to remain without curbs, gutters, or sidewalks as desired to maintain a less urban appearance. New residential development in Los Altos will primarily be infill, where streets have already been constructed to City standards.

Section C.3 Non-Governmental Constraints

Market factors over which a local government has only limited ability to control can influence the jurisdiction's capacity to develop more housing. These market-related constraints include land cost, construction cost, and the availability of financing. An assessment of these non-governmental constraints can inform the development of potential actions that can ameliorate its impact.

C.3.1 Housing Supply/Conditions

Market Overview: For-Sale

As shown in the Needs Assessment (Appendix A, Figure A-39), the region's home values have increased steadily since 2001, besides a slight decrease during the Great Recession. The rise in home prices has been especially steep since 2012, with the median home value in the Bay Area nearly doubling during this time. The typical home value in Los Altos was estimated at $3,358,599 in December 2020, a 159 percent increase from $1,296,783 in 2001.

Since the beginning of the recovery from the Great Recession in 2012, interest rates have been maintained at low levels of 3.5 to 4.5 percent. Due to the COVID-19 pandemic, however, national 30-year mortgage rates have dropped to historically low levels. According to the Federal Home Loan Mortgage Corporation, or Freddie Mac, 30-year mortgage rates have held at or around 2.8 percent since August 2020, with an average of 2.88 percent as of September 2021[11]. Note that rates have been increasing in recent months.

When interest rates are low, capital investment and housing production generally increase, and more people are likely to take out a mortgage than when interest rates are higher. In addition, consumers are able to borrow more money for the same monthly payment. Extremely low interest rates are one of the factors that has led to overall increased home values in Los Altos above what has been seen in the past several years. Coupled with the general desire during the pandemic to move from denser to more spacious neighborhoods, the housing market will likely continue to be competitive in the near future.

[11] Federal Home Loan Mortgage Corporation (Freddie Mac), Primary Mortgage Market Survey® (September 23, 2021)

Market Overview: Rental

As shown in the Needs Assessment (Appendix A, Figure A-42), since 2009 the median rent has increased by 56.7 percent in Los Altos, from $1,980 to $3,103 per month. In Santa Clara County, the median rent has increased over 67 percent, from $1,540 to $2,155. The median rent in the region has also increased significantly during this time (a 54 percent increase). While Los Altos' rent increase outpaced the Bay Area but not the county, Los Altos' rent is 1.4 times greater than that of the county.

Per the Needs Assessment (Appendix A, Figure A-44), renter households in Los Altos experience a slightly lower housing cost burden compared to homeowners. An estimated 11.4 percent of renters spend 30 to 50 percent of their income on housing compared to 16.0 percent of those that own. Additionally, 11.2 percent of renters spend 50 percent or more of their income on housing, while 12.0 percent of owners are severely cost-burdened. In total, almost 23 percent of renters (457 households) are cost burdened, compared to 28 percent of owners (2,416 households).

C.3.2 Development Costs

Land Costs

Due to the lack of vacant property in the city, a residual land value analysis was used to estimate the price of land in Los Altos. The analysis used comparables from the City and nearby communities sold within the past three years (2019 through 2021). Individual lots ranged from $68 to $152 per square foot, or about $2,968,298 to $6,608,688 per acre. Lot sizes ranged from approximately 5,401 to 10,667 square feet. Residential multi-family land in the city is estimated to cost an average of $110 per square foot, or about $4,782,048 per acre. In 2020, land values were estimated in conjunction with evaluation of the City's park in-lieu fee. The 2020 analysis valued single-family residential land at a range of $150 to $190 per square foot and multi-family residential land at $300 to $350 per square foot, assuming condominium and mixed-use development for multi-family land. Based on the 2020 estimates, multi-family land costs are over $15 million per acre.

There were no recent raw land sales in Los Altos, and the city is generally built out. The lack of available land in is considered a constraint to development, as housing production will most likely occur on more expensive opportunity sites for redevelopment. A developer will need to pay for the existing on-site improvement before demolishing it, resulting in a cost premium over vacant land. In addition, sites with existing uses will most likely incur more costs due to the removal of on-site structures.

Construction Costs

According to a March 2020 report published by the Terner Center for Housing Innovation at UC Berkeley, construction costs for multi-family housing in California have climbed 25 percent between 2009 and 2018. This increase is in part due to the higher cost of building materials, such

as wood, concrete, and steel, as well as prevailing wage requirements. According to RSMeans, construction costs (including materials and labor but excluding soft costs such as fees) for a small apartment complex in the Los Altos area ranged between $165 to $193 per square foot in 2021. However, based on the City's 2016 affordable housing nexus studies, apartment construction costs for West Santa Clara jurisdictions were estimated at $230 per square foot. Construction costs have continued to increase since 2016. Construction costs can vary depending on the type of development, ranging from more expensive steel-frame Type I construction to more affordable wood-frame Type V. Due to the smaller scale, single-family homes tend to be more expensive to construct on a per square foot basis than multi-family. This cost can fluctuate depending on the type and quality of amenities to the property, such as expensive interior finishes, fireplaces, swimming pools, etc.

Soft costs are the costs that are not directly incurred by the physical construction of the development. These costs include services for architectural, consultant, and legal services, as well as permitting requirements and impact fees. They generally range from 15 to 30 percent of total development costs but can fluctuate depending on local fees and exactions. Please refer to the Permit and Development Fees section, above, for a discussion of the City's required permit and development fees.

C.3.3 Availability of Financing

The availability of financing can impact rates of homeownership. The ability to secure financing can be influenced by several factors, including creditworthiness, debt-to-income ratio, and the restrictiveness of mortgage lending standards. Reviewing data collected through the Home Mortgage Disclosure Act (HMDA) can reveal the role the lending market has had on local home sales. Home purchase loans in 2020 are summarized in the table below.

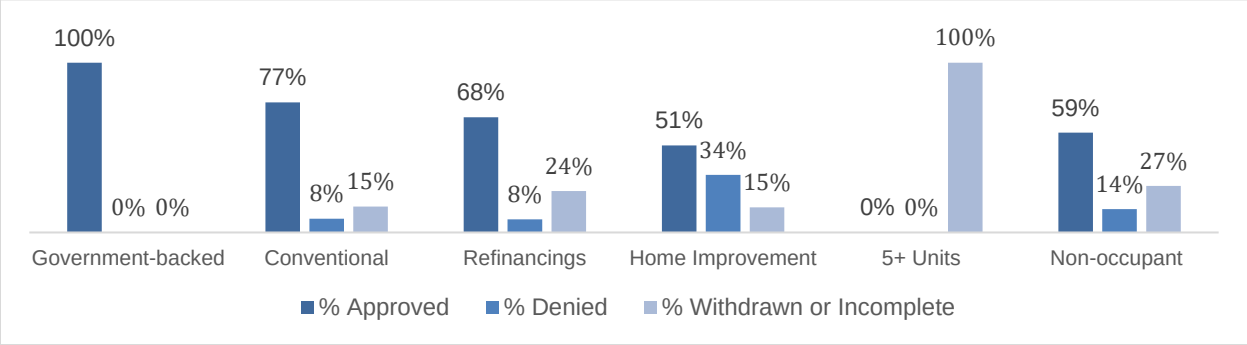
Almost all traditional home loan applications (between government-backed and conventional) in 2020 were for conventional loans, for a total of 382 home loan applications across both types. This disparity could be driven from high home values in Los Altos, as government-backed loan programs typically have a maximum loan amount. The approval rate for conventional loans was 77 percent.

In competitive housing environments, where purchasing a new home may be out of reach for some, home renovations can be a desirable and more affordable way to add value to property. There were 115 home improvement applications in 2020. The approval rate for these types of applications was 51 percent.

Table C-13: Total Home Loan Applications

Type	Total Applications
Government-backed	1
Conventional	381
Refinancing	2,277
Home Improvement	115
5+ Units	1
Non-occupant	102
Source: HMDA, 2020	

Figure C-1: Home Loan Application Disposition



Source: HMDA, 2020

C.3.4 Market Constraints Summary

Economic conditions in Los Altos reflect a competitive housing market. Residential developments can garner higher home sale prices and rental rates than across the ABAG region. As such, Los Altos has market conditions that favor the development of both for-sale and for-rent housing. Due to high housing demand, however, Los Altos is generally built out, so future housing development will be constrained by existing development or require demolishing existing structures, improvements, and uses. The lack of available vacant land may constrain housing production due to the increased costs associated with redevelopment.

C.3.5 Community Resistance to Housing

Another constraint to housing production in the Bay Area is community resistance to new developments. There are various concerns often expressed, including new housing developments will cause increased traffic, place a burden on other infrastructure (e.g., water supply, schools, etc.), adversely affect community character, and result in loss of valuable open space. Regardless of the factual basis of the concern, vociferous opposition can slow or stop development.

While potential opposition to affordable housing exists in many communities throughout the Bay Area, Los Altos recently implemented objective development standards for multi-family and mixed-use developments to facilitate project review and approvals. The City continues to inform the community about State requirements for streamlining housing and works diligently to maintain compliance with ongoing amendments to State law.

Section C.4 Environmental and Infrastructure Constraints

C.4.1 Environmental Constraints

Los Altos is a fully urbanized community on the northwestern edge of Santa Clara Valley. Its name, Spanish for "The Heights," references its position at the foot of the Santa Cruz Mountains, and portions of four creeks flow downhill through Los Altos on their course to the San Francisco Bay. Due to its relatively flat terrain in an economically dynamic region, Los Altos is almost entirely built-out, with few remaining vacant parcels (even when accounting for potential annexations). Future growth will occur primarily through the redevelopment of existing land uses.

The City has taken measures to prepare for and mitigate impacts from its main environmental hazards – seismic activity, landslides, flooding, and wildfire. These measures include required slope stability studies for hillside development and setbacks along flood-prone Adobe Creek through the City's watercourse protection regulations (Municipal Code Chapter 6.32). None of these identified environmental hazards are considered a constraint that would significantly affect the production and maintenance of housing.

C.4.2 Infrastructure Constraints

Water

Los Altos' water is supplied by the California Water Service Company (Cal Water), part of the Los Altos Suburban District, which also serves part of Los Altos Hills, Cupertino, Mountain View, and Sunnyvale. Water is sourced from a combination of local groundwater (28 percent) and imported water (72 percent). The latter is treated surface water purchased from the Santa Clara Valley Water District (SCVWD), which originates in SCVWD reservoirs and the San Joaquin-Sacramento River Delta.

The most recent Infrastructure Improvement Plan (2022-2024) was submitted by Cal Water on July 1, 2021. The 2020 Urban Water Management Plan for the Los Altos Suburban District was submitted in June 2021. The City does not anticipate a significant increase in water demand during the planning period, and the SCVWD has not identified any substantial concerns with adequate availability of water resources.

Sewer and Stormwater

The City sanitary sewer system serves most residents and businesses, with the exception of several homes with septic systems. The City's sanitary sewer system also serves the unincorporated area within its sphere of influence, including parts of Los Altos Hills and Mountain View. Wastewater is conveyed to the Palo Alto Regional Water Pollution Control Plant, owned and operated by the City of Palo Alto, for treatment and disposal. The City is permitted to discharge up to 3.6 million gallons per day (MGD) average annual dry weather flow to the Regional Plant.

The City owns and maintains the collection system within the City and its sphere of influence, including a limited number of pipes within Los Altos Hills and the trunk sewer that connects the City to the master metering station for the Regional Plant. The City's collection system includes approximately 140 miles of sewer, most of which is 6-inch and 8-inch vitrified clay pipe.

The City most recently updated its Sanitary Sewer Master Plan in 2012 after assessing the hydraulics, physical condition, and maintenance of its collection system. Results showed that less than five percent of inspected pipes were in poor condition. The Stormwater Master Plan was updated in 2016. Both Master Plans identified capital improvement priorities necessary to maintain capacity and reduce flooding/overflow risk in the sewer and stormwater systems. Additionally, the City completed a Green Stormwater Infrastructure (GSI) Plan in 2019 as required for all municipalities in the San Francisco Bay Area under the area's Municipal Regional Stormwater Permit (MRP). The GSI Plan will guide the identification, implementation, tracking, and reporting of GSI projects in coordination with the Master Plans and other local and regional frameworks.

Overall, the City's remaining permitted sewer discharge and projected stormwater conveyance capacities are adequate to accommodate anticipated future development.

Dry Utilities

Electricity in Los Altos is provided jointly by Silicon Valley Clean Energy, a Clean Choice Energy (CCE) program, and PG&E. Natural gas is provided solely by PG&E. Additional dry utilities include cable TV/internet (AT&T and Comcast) and solid waste (Mission Trail Waste Systems). All dry utilities are available throughout Los Altos for any future development or redevelopment.

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Appendix D: Existing Programs Review

Contents

Section D.1 Existing Housing Programs Review

This Appendix documents the implementation status of the current Housing Element programs. The main purpose is to evaluate which programs were successful and should be continued, and which programs were ineffective and should be eliminated or modified.

Many of the City's 2015 Housing Element programs were successfully completed or include effective ongoing City efforts. These programs include amending zoning standards for Accessory Dwelling Units (ADUs), single-room occupancy units (SROs), transitional and supportive housing, and emergency shelters; implementing inclusionary housing requirements; and monitoring and managing the City's stock of below market rate units. These programs have facilitated housing such as Accessory Dwelling Units (ADUs) and low and moderate-income units that provide housing options for special needs populations, such as seniors and people with disabilities. The City transfers its CDBG funding to the County to implement local housing programs, including those that assist low income households, large households, female headed households, persons experiencing homelessness, and others in need. Specifically, 2015 Housing Element Goal 3: *Create housing opportunities for people with special needs* – and Goal 6: *Increase housing opportunities for Los Altos' senior population* – and subsequent policies and related programs advanced housing for special needs populations as follows:

- Under Policy 3.1, the City supports efforts of the County and local social service providers to increase their capacity to operate facilities servicing people experiencing homelessness.
    - Program 3.1.1 directs the City to assist with funding for the provision of services for people experiencing homelessness. Implementing this program, the City transfers its CDBG funding to the County to support programs for the homeless.
    - Program 3.1.2 directs the City to participate in regional efforts on homelessness and emergency and transitional housing. In addition to transferring CDBG funds to the County (see Program 3.1.1, above), the City provides funding to Community Services Agency (CSA) of Mountain View and Los Altos that provides various housing services and primarily serves seniors within the Los Altos community.
- Under Policy 3.2, the City amended the Zoning Ordinance for compliance with State law pertaining to emergency shelters, transitional housing, and supportive housing.
    - Programs 3.2.1 and 3.2.2 direct the City to amend the Zoning Ordinance to allow emergency shelters, transitional housing, and supportive housing consistent with State law. The City implemented this program by amending the Zoning Ordinance, although further amendments are now required for compliance with State law (e.g., Low Barrier Navigation Centers, AB 2162).

    - Program 3.2.3 directs the City to amend the Zoning Ordinance to allow single-room occupancy units (SROs). The City implemented such amendments, but no SRO applications have been submitted.

- Under Policy 6.1, the City promotes services and information to help seniors maintain independence and remain in their own homes.
    - Program 6.1.2 directs the City to maintain and publicize resources for seniors, and the City prepared a handout and an informational letter to contractors and property owners on Age Friendly Design elements.
- Under Policy 6.2, the City encourages a variety of senior housing opportunities.
    - Program 6.2.1 directs the City to provide density bonus increases in the Cuesta-Lassen multi-family district of up to 38 dwelling units per acre, and the City will process these requests when received.

Although existing policies and programs have provided resources to special needs populations and resulted in more opportunities for housing that can accommodate special needs groups, limited housing has become available since 2015 for these special needs groups. Therefore, the existing programs have been substantially strengthened, and new programs added to further housing opportunities for special needs populations.

Various existing programs are recommended to be continued with some modifications to improve effectiveness based on the housing needs assessment (Appendix A), housing constraints analysis (Appendix C), and/or reflect State law or other programmatic changes since the last Housing Element adoption. Other programs, however, are recommended to be deleted, as they are addressed through the sites inventory and rezone program, may have been completed in the last Housing Element cycle, or may be better reframed as policies instead of programs. Please see Table D-1 for the analysis of existing programs.

Table D-1: Existing Housing Element Programs Review

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
Program Category 1: Preservation, Conservation, and Rehabilitation					
1.1.1 Implement voluntary code inspection program	Continue the voluntary code inspection program encompassing code compliance, rehabilitation, energy conservation, and minimum fire safety standards.	-	Community Development Department[1]	The City continues this program. Since 2015, there were only 5 substandard housing code enforcement cases.	**Continue**
1.1.2 Help secure funding for housing assistance programs	Continue to assist in the provision of housing assistance in Los Altos for low-income households with other public agencies and private nonprofit organizations that offer rental assistance, home repairs, and first-time homebuyer assistance. To minimize overlap or duplication of services, Los Altos will undertake the following actions: The City will support County and nonprofit housing rehabilitation programs by providing program information to interested individuals through handouts available at City Hall, the Los Altos Senior Center, the Los Altos Library, and the Woodland Branch Library. The City will contact previous rehabilitation applicants when new funding becomes available and post a legal notice in the newspaper when housing rehabilitation funds become available. The City will continue to transfer their Community Development Block Grant (CDBG) funds to the County to support housing programs each year.	-	Community Development Department, City Council	The City continues to transfer its CDBG funds to the County to support local housing programs. Various programs are available that the City could better promote.	**Modify -** expand the City's methods of providing information (e.g., City website, email, social media, etc.).

[1] The Community Development Department was changed to the Development Services Department in 2022. This reflects the Department's name at the time of the 2015 Housing Element adoption.

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
1.2.1 Support rezoning from office to medium-density multifamily	Support case-by-case review of property owner–initiated rezoning from Office to Medium-Density Multifamily in the Fremont-Giffin Office District.	-	Community Development Department	No rezone applications to date. This is addressed through sites inventory and rezoning program(s).	**Delete -** addressed through sites inventory and rezoning program(s).
1.3.1 Enforce neighborhood residential buffering	Enforce minimum standards for buffers between residential properties and commercial uses and public/quasi-public uses. Enforcement will occur through the development permit review process as provided in the Zoning Ordinance. Buffering will include a combination of landscaping, minimum setback, or yard requirements and stepped-back building heights.	-	Community Development Department, Planning and Transportation Commission	This is addressed through the Land Use Element and Zoning Code setbacks and objective design standards.	**Delete -** addressed through the Land Use Element and Zoning Code setbacks and objective design standards.
1.3.2 Restrict commercial uses in residential neighborhoods	Continue to restrict commercial uses in residential neighborhoods.	-	Community Development Department	The City has continued to prohibit commercial uses in residential zones except as allowed for home occupations.	**Modify -** clarify that home occupations are allowed in residential zones consistent with the Zoning Code.
1.4.1 Implement zoning and design standards	Continue to implement residential zoning, development standards, and design review to ensure compatibility of housing with neighborhood character, minimum open yard space, and streets that are safe.	-	Community Development Department, Planning and Transportation Commission, City Council, Design Review Commission	The City continues to implement zoning standards and design review. Objective standards have been adopted to facilitate and streamline development review.	**Modify/Merge -** implement development and design standards that are objective in the review of housing developments consistent with State law. See Program 1.4.2.
1.4.2 Evaluate design review process	Regularly review and adjust, if appropriate, criteria, objectives, and procedures for design review of residential construction to be compatible in terms of bulk and mass, lot coverage, and proportion with houses in the immediate vicinity. This program will set criteria under which development must be reviewed by City staff, the Design Review Commission, and/or the Planning and Transportation Commission.	-	Community Development Department, Design Review Commission, Planning and Transportation Commission, City Council	The City made modifications in 2015 and 2015 to design review requirements. The design review process should continue to be evaluated and streamlined.	**Modify -** amend design review process and review bodies to streamline and remove the story pole requirement.

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
1.4.3 Facilitate alternative modes of transportation in residential neighborhoods	Facilitate alternative modes of transportation in residential neighborhoods.	-	Community Development Department, Planning and Transportation Commission, City Council	The City has implemented this through the development review process. More specificity could be provided.	**Modify -** provide specific actions the City will undertake (e.g., fund community service organizations or other organizations to offer rides, etc.)
1.4.4 Accommodate the needs of children through design review and land use regulations, including open space, parks and recreation facilities, pathways, play yards, etc.	Accommodate the needs of children through design review and land use regulations, including open space, parks and recreation facilities, pathways, play yards, etc.	-	Community Development Department	This has been completed through the adoption of common and private open space standards for multi-family projects.	**Modify -** this has been completed; however, the City could incentivize creation of play areas in housing developments.
1.5.1 Review compatibility of land divisions as part of the permit review and approval process	Review compatibility of land divisions as part of the permit review and approval process.	-	Community Development Department, Planning and Transportation Commission, City Council	This is addressed through subdivision map findings for approval.	**Delete -** this is addressed through State required subdivision map approval process and findings.
Program Category 2: New Construction					
2.1.1 Encourage diversity of housing	Require diversity in the size of units for projects in mixed-use or multifamily zones to accommodate the varied housing needs of families, couples, and individuals. Affordable housing units proposed within projects shall reflect the mix of community housing needs.	-.	Community Development Department, Planning and Transportation Commission, City Council	The City evaluates during development review. This is policy language, not a program.	**Delete -** reframe as a policy.

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
2.1.2 Implement multifamily district development standards	Continue to implement the multifamily district development standards to ensure that the maximum densities established can be achieved and that the maximum number of units is required to be built. (See Table B-41 in Appendix B for a summary of multifamily zoning requirements.)	-	Community Development Department, Planning and Transportation Commission, City Council	The City continues to implement adopted standards.	**Delete -** replace with programs to remove identified constraints to housing (Appendix C).
2.1.3 Allow employee housing	The City shall amend the Zoning Ordinance to specifically allow employee housing for six or fewer residents as a permitted use in residential zoning districts, in compliance with Health and Safety Code Section 17021.5and 17021.6.	-	Community Development Department, Planning and Transportation Commission, City Council	The City has not amended the Zoning Code to allow for employee housing given limited agricultural operations in Los Altos.	**Continue**
2.2.1 Provide development incentives for mixed-use projects in commercial districts	Continue to implement the affordable housing mixed-use policies developed for the Commercial Thoroughfare (CT) district, and expand development incentives to other commercial districts in the city, including CN (Commercial Neighborhood), CS (Commercial Service), CD (Commercial Downtown), CD/R-3 (Commercial Downtown/ Multiple Family), and CRS (Commercial Retail Service). Development incentives will be included for these districts that will encourage the development of affordable housing in these identified commercial areas.	-	Community Development Department, Planning and Transportation Commission, City Council	The City adopted amendments to the CT District and density bonus provisions to implement this program.	**Delete -** incentives through density bonus and other standards addressed through other programs.
2.3.1 Implement density bonuses	Continue to implement density bonuses and other incentives as provided by state law and the City's Zoning Ordinance.	-	Community Development Department	The City continues to review and approve density bonus and incentive requests.	**Modify -** amend density bonus provisions to be consistent with State law.
Program Category 3: Special Needs Housing					
3.1.1 Support efforts to fund homeless services	Consider pursuing funding from available sources for homeless services. The City will also assist community groups that provide homeless services and assist such groups in applying for funding from other agencies. The City will consider applying for grants where appropriate or will encourage/partner with local and regional nonprofit organizations that wish to apply for such grants.	-	Community Development Department, CDBG funds* (As transferred to the County and applied to the City program.)	The City continues to transfer its CDBG funds to the County to support local housing programs, including programs to support people experiencing homelessness.	**Modify -** reflect City funding and support of the County's homelessness services; add City promotion of these available services.

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
3.1.2 Continue to participate in local and regional forums for homelessness, supportive, and transitional housing	Continue to participate in regional efforts as coordinated with other adjacent cities to address homeless and emergency and transitional housing issues and potential solutions.	-	Community Development Department, City Council, Community Services Agency	In addition to transferring its CDBG funds to the County, the City provides funding for the Community Services Agency (CSA) of Mountain View and Los Altos that provides various housing services.	**Modify -** expand to reflect the City's funding and support for CSA.
3.2.1 Amend the City's Zoning Ordinance to accommodate emergency shelters	Amend the City's Zoning Ordinance concurrently with the adoption of this Housing Element to allow emergency shelters as a permitted use by right in the Commercial Thoroughfare (CT) district without a conditional use permit or other discretionary review and only subject to the development requirements in this zone. This district is well suited for the development of emergency shelters with its full access to public transit and underdeveloped parcels that allow higher-density housing opportunities. The public transit opportunities include Caltrain, the VTA Bus Service, and the VTA transit hub on Showers Drive in Mountain View. The CT district has almost 11 acres of underdeveloped parcels that will accommodate residential housing such as emergency shelters. Four key opportunity sites make up the approximately 11 acres of development potential that could generate as much as 378 housing units, not including density bonuses for affordable housing. The City will also evaluate adopting standards consistent with Government Code Section 65583(a) (4) that addresses operational and design criteria that may include: • Lighting • On-site management • Maximum number of beds or persons to be served nightly by the facility	-	Community Development Department	The City adopted Zoning Code amendments in 2015 that allow for emergency shelters consistent with State law.	**Delete -** this has been completed. A new program will address Low Barrier Navigation Centers.

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
	• Off-street parking based on demonstrated need • Security during hours that the emergency shelter is in operation • Allowing supportive services on-site at a level commensurate with the number of beds				
3.2.2 Recognize the statutory requirements for transitional and supportive housing	Recognize the requirement of SB 2 to explicitly allow both supportive and transitional housing types in all zones that allow residential. The definitions of transitional and supportive housing as defined in Health and Safety Code Sections 50675.2 and 50675.14. Transitional and supportive housing will be allowed as a permitted use, subject only to the same restrictions on residential uses contained in the same types of structure.	-	Community Development Department	The City amended the Zoning Code in 2015 to allow transitional and supportive housing.	**Modify -** additional Zoning Code amendments are necessary to be consistent with current State law for transitional and supportive housing.
3.2.3 Provide incentives and amend the City's Zoning Ordinance for compliance with statutory requirements for single-room occupancy residences to address the needs of extremely low-income households	AB 2634 requires cities to identify zoning to encourage and facilitate supportive housing in single-room occupancy units. The City will amend the Zoning Ordinance concurrently with the adoption of this Housing Element to define single-room occupancy units (SROs) and to allow SROs with a conditional use permit in commercial thoroughfare districts in the city. In addition, the City will review its affordable housing ordinance and other available development incentives to determine what measures can be taken to encourage the development of housing for people with extremely low incomes.	-	Community Development Department	The City amended the Zoning Code in 2015 to allow SROs. No SROs have been applied for since the Zoning Code amendment. The City may consider additional measures to encourage SROs.	**Modify -** revise to focus on actions to encourage SROs (reduced parking, streamlined review, etc.)

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
Program Category 4: Affordability					
4.1.1 Monitor condominium conversion	Continue to implement the Condominium Conversion Ordinance to protect against the conversion or demolition of rental units. It shall require buildings in multifamily zoning districts initially built as rental units which have not been converted to condominiums to be reconstructed as rental units unless there is greater than a 5 percent vacancy rate.	-	Community Development Department	No apartments were converted to condominiums during the last cycle.	**Continue**
4.1.2 Conserve small houses in areas of small lot sizes	Continue to conserve the stock of small houses in areas of small lot sizes.	-	Community Development Department	The City continues to implement, but there are no specific standards.	**Delete -** reframe as a policy.
4.2.1 Facilitate new construction of second dwelling units	Chapter 14.14 (Second Living Units in R1 Districts) of the Municipal Code allows a detached second dwelling unit to be permitted on a lot or parcel within a single-family residential district that has a minimum of the greater of 150 percent of the lot area required in the residential zoning district in which the second living unit is proposed to be located, or 15,000 square feet of lot area. A lesser lot size is required if a second unit is attached to the main residence. Findings for approval include that a public benefit will result because the proposed second living unit will be maintained as affordable for very low- and low-income households. A second living unit may be established through the conversion of existing floor space in a single-family structure, the addition to a single-family structure, conversion of a conforming accessory structure, or the construction of a new accessory structure. The City will continue to implement the following actions annually: • Continue to implement second dwelling unit regulations to provide increased opportunities for the development of affordable second units. • Promote awareness of regulations which allow the construction of new second units consistent with City regulations through public	-	Community Development Department	The City adopted updates to the ADU standards pursuant to State law. The City has seen an increase in ADU interest and permits.	**Modify -** promote ADU production through streamlined review and clear information/ requirements.

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
	information at the Community Development Department public counter and inclusion on the City's website. • Annually review the number of second dwelling unit permits issued. • Continue to require a verification and quantification procedure regarding rent and occupancy as a condition of the permit.				
4.2.2 Study the feasibility of reducing minimum lot sizes for second living units	Study the feasibility of reducing minimum lot sizes for second living units and amend, as appropriate, the Zoning Ordinance to a reduce the minimum lot size for second dwelling units.	-	Community Development Department, City Council	The City adopted various amendments to ADU standards. This is no longer applicable as State law prohibits establishing a minimum lot size.	**Delete -** no longer applicable as State law prohibits establishing a minimum lot size.
4.3.1 Assist in the development of affordable housing	If necessary for the development of affordable housing projects, and when requested by the project sponsor, consider assisting in securing funding for low- and moderate-income housing developments through one or more of the following actions: • Transfer the City's annual CDBG allocation to the County for projects that serve the Los Altos community. • Provide funding to participate in a multi-jurisdictional housing finance program (such as a Mortgage Revenue Bond or Mortgage Credit Certification Program). • Apply for state and federal funding on behalf of a nonprofit, under a specific program to construct affordable housing including persons with physical disabilities or developmental disabilities.	-	Community Development Department, City Council	In addition to transferring its CDBG funds to the County, the City processes density bonus and incentive requests for projects that include affordable units.	**Modify -** add other financial incentives for the City to consider and offer (e.g., waiving City fees for 100% affordable housing projects).

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
4.3.2 Implement Chapter 14.28 of the Municipal Code, which defines the number of required below-market-rate (BMR) units by development size and type, and requires on larger projects (greater than 10 market-rate units) that the BMR units generally reflect the size and number of bedrooms of the market-rate units	Continue to implement the City's Multi-Family Affordable Housing Ordinance (Chapter 14, Section 28), which includes a series of unit thresholds at which affordable housing units will be required. The ordinance establishes the following thresholds and requirements: • 1–4 units: Affordable housing units are not required. • 5–9 units: Affordable housing units are required. In the event that the developer can demonstrate to the satisfaction of the City Council that providing affordable housing units in a project will be financially infeasible, the City Council may waive the requirement to provide affordable housing units. • 10 or more units: Affordable housing units are required as follows: o For rental units – 15% low income or 10% very low-income housing o For owner units – 10% moderate-income housing Chapter 14.28 also notes that unless otherwise approved by the City Council, all affordable units in a project shall be constructed concurrently with market-rate units, shall be dispersed throughout the project, and shall not be significantly distinguishable by design, construction, or materials.	-	Community Development Department	In 2018, the City changed requirements to 15% for 5 to 9-unit projects; 20% low income or 15% very low income for rental projects of 10 or more units; and 15% (with the majority of units affordable to moderate income) for ownership projects of 10 or more units. Between 2015-2020, the City issued permits for 2 very low income units, 28 low income units, and 2 moderate income units.	**Modify-** remove specification of inclusionary amounts as those may be adjusted as needed to better meet housing objectives. Evaluate inclusionary housing requirements to improve effectiveness in meeting City objectives.
4.3.3 Consider reduced parking requirements for certain housing types and affordable housing units	For affordable housing units and small housing units including senior housing, studios and SROs, the City will consider allowing just one parking space per unit. The City will continue to monitor the underground parking requirement to ensure this requirement is not a constraint to the production of housing or a constraint to meeting maximum densities.	-	Community Development Department	The City has allowed mechanical parking lifts to facilitate underground parking for mixed-income projects.	**Modify -** evaluate various approaches to reduce parking requirements and amend the Zoning Code to implement.

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
4.3.4 Continue to encourage maximum densities	Continue to ensure that the City is meeting maximum densities in the zones that allow multifamily housing. The City will monitor the lot coverage requirement and the height requirements. Most recently, the City removed the "stories requirement" from the commercial and multiple-family districts to allow more flexibility in development and to facilitate greater potential densities. The City also codified a maximum density development requirement, which notes that the maximum density permitted shall be constructed unless it is determined by the City Council that a less dense project would be in the best interests of the community. In addition, the City will monitor the underground parking requirements as stated in Program 4.3.3 to ensure that they do not cause a significant constraint to meeting the maximum densities required by all of Los Altos' multiple- family zoning districts.	-	Community Development Department	The City has continued to implement this program; however, current analysis of governmental constraints documented in Appendix C.	**Delete -** replace with programs to remove identified constraints to housing (Appendix C).
4.3.5 Initiate an affordable housing administration contract review and renewal	Initiate a Request for Project for the contract administration of the City's affordable housing programs including an emphasis on an appropriate contract duration, administration responsibilities, enforcement, outreach and marketing.	-	Community Development Department, City Council	The City has a contract with Alta Housing, who monitors the City's BMR units.	**Modify -** update to reflect existing contract and commitment to monitor BMR units.
4.3.6 Improve the City's BMR program priority ranking process	Review and amend, as necessary, the City's BMR program application ranking process.	-	Community Development Department, City Council	Implemented in March 2015, when the City revised the priority list to merge Los Altos residents and those employed within the City limits as a second priority.	**Delete -** this program has been completed.
4.3.7 Consider a commercial development linkage fee for affordable housing	Study and explore the option of a commercial development linkage fee for affordable housing. If appropriate, consider adopting a local fee.	-	Community Development Department, City Council	Adopted a commercial development linkage fee ordinance in 2018 (Municipal Code Chapter 3.49). A fee has not yet been established.	**Modify -** conduct required analysis to support and adopt a commercial linkage fee.

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
Program Category 5: Housing Discrimination					
5.1.1 Assist residents with housing discrimination and landlord-tenant complaints	Continue to provide a service to refer individuals to organizations or agencies who handle complaints about discrimination, landlord-tenant relations, etc. Complaints regarding discrimination will be referred to the Mid-Peninsula Citizens for Fair Housing, Santa Clara County, and other appropriate fair housing agencies. Complaints regarding landlord-tenant problems will be referred to the Los Altos Mediation Program, the County of Santa Clara Office of Consumer Affairs, or other appropriate local agencies.	-	Community Development Department	The City continues to make referrals as complaints arise. The non-profit organization Project Sentinel provides fair housing services to residents of Santa Clara County.	**Modify -** expand to raise awareness of services in addition to referring complaints.
Program Category 6: Senior Housing					
6.1.1 Discourage senior-only housing from converting to other uses	Discourage projects developed as senior-only projects from converting to other uses.	-	Community Development Department	The City continues to implement, but no specific standards.	**Delete -** reframe as a policy.
6.1.2 Assist seniors to maintain and rehabilitate their homes	Seek, maintain, and publicize a list of resources or service providers to help seniors maintain and/or rehabilitate their homes.	-	Community Development Department, Senior Commission	City staff assisted the Senior Commission on an informational letter to contractors and property owners on Age Friendly Design Elements. The City created a handout on Age Friendly Design Elements.	**Modify -** update (as needed) and regularly promote the Age Friendly Design Elements handout; require larger lower income developments to utilize Universal Design standards
6.1.3 Encourage conforming and contextual senior housing near transportation and services	Ensure that senior housing conforms and harmonizes with surrounding neighborhoods and encourage that it be located near transportation and services.	-	Community Development Department	The City implements Zoning Code standards for development.	**Delete -** reframe as a policy for promoting senior housing near transit and services.

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
6.2.1 Provide senior housing density bonuses and development incentives	Provide density bonus increases in the Cuesta-Lassen multifamily district of up to 38 dwelling units per acre for projects that are senior-only. Provide expanded development incentives for senior-only projects in this district. Consider increased densities and development incentives for senior and affordable housing projects in all multifamily districts.	-	Community Development Department	The City continues to process density bonus and incentive requests.	**Modify -** codify the additional density bonus and incentives for senior-only projects.
6.2.2 Designate and encourage senior housing on specific well-suited sites	Identify and consider additional parcels well suited for senior housing. All PUD/SC sites were developed during the previous planning period.	-	Community Development Department	The City has continued to consider additional parcels for senior housing, and potential housing sites are identified in the sites inventory (Appendix B).	**Delete -** addressed through sites inventory and rezoning program.
6.2.3 Mixed-use development, including developments that contain senior and institutional housing, will be encouraged in public and quasi-public land use areas that are zoned PCF	Mixed-use development, including developments that contain senior and institutional housing, will be encouraged in public and quasi-public land use areas that are zoned PCF.	-	Community Development Department	The City has continued to consider additional parcels for housing, and potential housing sites are identified in the sites inventory (Appendix B).	**Delete -** addressed through sites inventory and rezoning program.
6.2.4 Senior housing with extended care facilities will be allowed in multifamily and mixed-use zoning districts	Continue to explore opportunities to promote senior housing with extended care facilities in other multifamily and mixed-use districts. This type of housing is currently allowed as a conditional use in the PCF district.	-	Community Development Department	The City has continued to consider opportunities to promote senior housing with extended care facilities in other areas.	**Modify -** amend Zoning Code to clearly allow senior housing under multi-family use and residential care facilities consistent with State law.

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
Program Category 7: Energy Efficiency					
7.1.1 Promote energy and water conservation through education and awareness campaigns	Continue to promote residential energy and water conservation, consistent with the City's adopted Climate Action Plan, through consumer information on financial assistance and rebates for energy-efficient home improvements published by governmental agencies, nonprofit organizations, and utility companies. The City will make information available at the public counter of the Community Development Department, at the Los Altos Senior Center, through the public libraries, and through the City's newsletters. The information will also be available on the City's website, and a link to energy programs will be placed on the Los Altos Environmental Commission's website.	-	Community Development Department	City staff and the Environmental Commission continue to implement. The City is currently developing a Climate Action and Adaptation Plan (CAAP).	**Continue/Update -** update to reflect the CAAP effort as appropriate. Merge with other programs as noted below.
7.1.2 Participate in a Property Assessed Clean Energy (PACE) financing program	Los Altos has adopted resolutions supporting the CalFIRST Property Assessed Clean Energy (PACE) Program. By doing this, Los Altos residents may be eligible to finance any energy improvements to their homes—solar panels, water-efficient landscapes, etc.—on their property tax assessment. This allows the financing to be extended over multiple years and also allows a home to be sold with that assessment assigned to the new owner. Although CalFIRST has encountered legal challenges to providing these loans for residential purposes, other opportunities exist. The City will vet the applicability of Cal FIRST alternatives and will participate as appropriate.	-	Community Development Department	The City adopted a Resolution supporting the PACE program.	**Modify -** delete this program and note PACE financing in Program 7.1.1.
7.1.3 Promote the use of solar energy	This program focuses on promoting solar energy as a means to increase energy efficiency and promote green energy alternatives. As part of this program, the City will leverage and promote other state and commercial initiatives to encourage solar energy, such as grants, tax credits, and rebates, as they are implemented. (No design review of solar panels is allowed by law. Setbacks, height restrictions, etc., are already covered by the Zoning Ordinance.)	-	Community Development Department	The City continues to provide information on available programs to the public.	**Modify -** delete this program and merge leveraging and promoting initiatives to encourage solar energy with Program 7.1.1.

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
7.2.1 Implement energy-efficient regulations	Continue to implement building code and zoning standards that promote energy efficiency in residential design, layout, construction, and landscaping. The City enforces energy efficiency standards of Title 24 of the California Code of Regulations (California Building Code Standards), which uses zoning requirements for lot size, building separation, yards, setbacks, landscaping, and design review to promote energy conservation in new development.	-	Community Development Department	The City continues to implement; Building Code compliance is mandatory.	**Delete -** Building Code compliance is mandatory.
7.2.2 Monitor and implement thresholds and statutory requirements of climate change legislation	Monitor the implementation measures of the Global Warming Solutions Act of 2006 (AB 32) and SB 375, which requires planning organizations to promote sustainable communities as part of their regional transportation plans. The City will implement the measures as guidance for thresholds and compliance methods are released by the State.	-	Community Development Department	City staff continue to implement measures, including the City's Climate Action Plan.	**Continue -** update to reflect the CAAP effort as appropriate.
Program Category 7: Statutory Compliance and Reporting					
8.1.1 Develop annual housing status report	Provide an annual status report to the City Council and California Department of Housing and Community Development (HCD) on the status of the General Plan housing programs and their implementation as required by state law.	-	Community Development Department	The City continues to submit Annual Progress Reports (APRs) to HCD annually.	**Modify -** expand to identify that reporting will also address no net loss requirements as necessary.
8.2.1 Participate in the regional housing needs determination.	Continue the regional conversation about meeting the housing needs. Actively participate in the ABAG Regional Housing Needs Determination. The City will meet with ABAG staff to provide land use, housing, employment, and other information related to the RHNA formula to ensure that the allocation accurately represents Los Altos' fair share of the region's housing needs.	-	Community Development Department	The City has continued to work with ABAG on the RHNA.	**Continue.**

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Appendix E: Public Participation Summaries

Contents

LOS ALTOS HOUSING ELEMENT

Community Workshop #1

Format: Zoom Virtual Meeting | January 13, 6:30-8:00pm

The purpose of the Housing Element Update Community Workshop #1 was to provide an overview of the Housing Element process and the components of a Housing Element, share background information and preliminary findings from housing needs, and gather input from meeting participants about critical housing issues, needs and goals for housing in the City of Los Altos. Feedback received will inform the content of future outreach events and will guide the preparation of the Housing Element Update.

The community workshop was held via Zoom on Thursday, January 13, 2022 from 6:30-8:00 pm and was facilitated by City staff and the consultant team (Lisa Wise Consulting, Inc. and Plan to Place). All materials were made available and posted on the project website prior to the meeting. Approximately 60 members of the public attended the meeting. The meeting agenda is outlined below:

1. Welcome & Introductions
2. Housing Element Basics
3. FAQ's
4. Community Engagement Overview
5. Preliminary Housing Data
6. Key Planning Considerations
7. Participant Q&A
8. Small Group Discussion + Report Back
9. Closing and Next Steps

ATTENDANCE

Meeting participants: approximately 60 attendees

City Staff

- Laura Simpson – *Interim Planning Director*
- Sonia Lee – *Public Information Officer*

Consultant Team

- **Lisa Wise Consulting, Inc.** – David Bergman, Jennifer Murillo, Stefano Richichi
- **Plan to Place** – Dave Javid, Paul Kronser

LOS ALTOS HOUSING ELEMENT

WORKSHOP SUMMARY

Laura Simpson opened the meeting by welcoming attendees, introducing the team, giving an agenda overview, and conducted the demographic live poll.

The following is a summary of the results from the demographic poll that was administered at the beginning of the meeting:

Demographic Live Poll (full results in the appendix)

1. **Where do you live? (select one)**
   - 91% live in Los Altos
   - 3% live in Santa Clara County but not Los Altos
   - 6% live outside of Santa Clara County

2. **Where do you work? (select one)**
   - 31% work In Los Altos (including remote work)
   - 11% do not work Los Altos, but in Santa Clara
   - 11% work outside Santa Clara
   - 39% are retired
   - 3% do not work or are looking for work
   - 6% do not work and are not looking for work

3. **Which of the following describes why you decided to attend tonight's workshop? (select all that apply)?**
   - 28% want to know more about the Housing Element Update process.
   - 4% want to know more about obtaining housing in Los Altos
   - 41% want to support more housing development in Los Altos
   - 26% are concerned about more housing development in Los Altos

4. **Have you participated in other Housing Element events?**
   - 32% yes
   - 68% no

5. **What is your current housing situation?**
   - 89% own a home
   - 8% rent a home
   - 3% live with family/friends (I do not own or rent)

6. **What type of housing do you live in?**
   - 79% live in a house
   - 15% live in a duplex/townhome/condo
   - 3% live in an apartment
   - 3% other

7. **What is your age?**
   - 3% 19-25

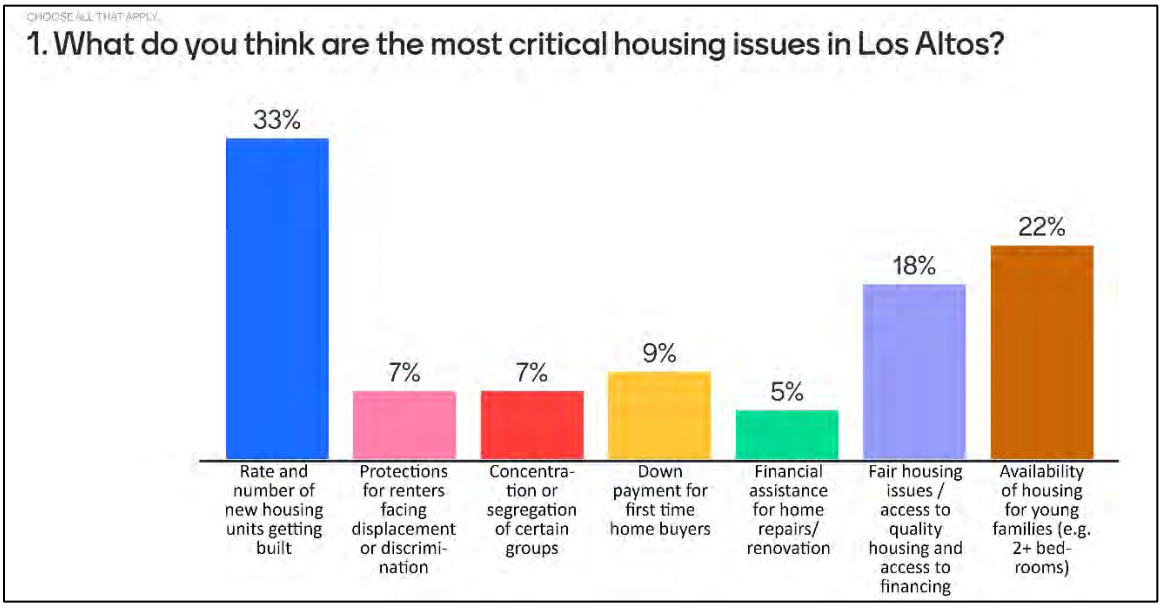
- 8% 26-45
- 44% 46-64
- 44% 65-84

8. **Race and Ethnicity (select all that apply)**
   - 71% White
   - 17% other
   - 9% Hispanic or LatinX
   - 3% Asian

9. **Which bracket best describes your household income?**
   - 15% $49,701 to $82,850
   - 3% $82,851 to $117,750
   - 24%117,751 to $181,550
   - 58% $181,551 or more

After the poll closed, Jennifer Murillo from Lisa Wise Consulting, Inc. (LWC) gave a presentation on the housing element process which included background and purpose, state requirements for housing elements, and the Regional Housing Needs Assessment (RHNA). The presentation also included with an overview of the community engagement process and strategy which included community input to date and upcoming activities for the public to participate in. Jennifer then provided a summary of initial findings and key planning considerations followed by an opportunity for any clarifying questions from the meeting participants through chat, which were answered by the project team. Some of the questions included clarification about the process and results of the polls. To find a list of all questions asked, please see the Appendix.

Following the presentation portion of the workshop, Dave guided workshop participants through an online live poll to gather feedback on housing in Los Altos. This provided attendees a preview of the topics to be covered in the small breakout rooms (see Appendix for the poll results).

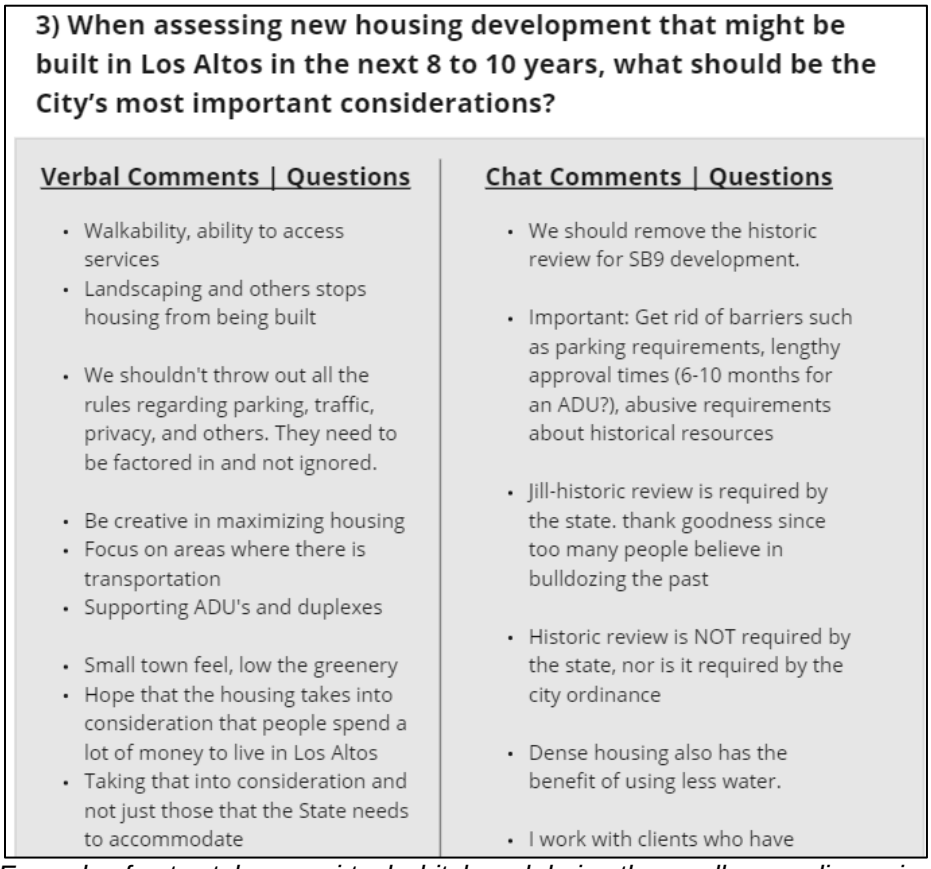


LOS ALTOS HOUSING ELEMENT

Prior to breaking into small groups, Dave gave an overview of the small group breakout room logistics and then opened the rooms which participants were randomly assigned. A facilitator and note taker from the project team were assigned to each breakout room.

SMALL GROUP DISCUSSION SUMMARY

The remainder of the meeting was devoted to gathering input from meeting participants through facilitated small group discussions. Feedback was recorded in three breakout rooms on a virtual whiteboard (see snapshot below) in response to the discussion prompts below. The summary below provides a high-level overview of themes that emerged from the small group discussions. The numbers in parenthesis indicate the number of breakout rooms in which the referenced comment was expressed.



3) When assessing new housing development that might be built in Los Altos in the next 8 to 10 years, what should be the City's most important considerations?

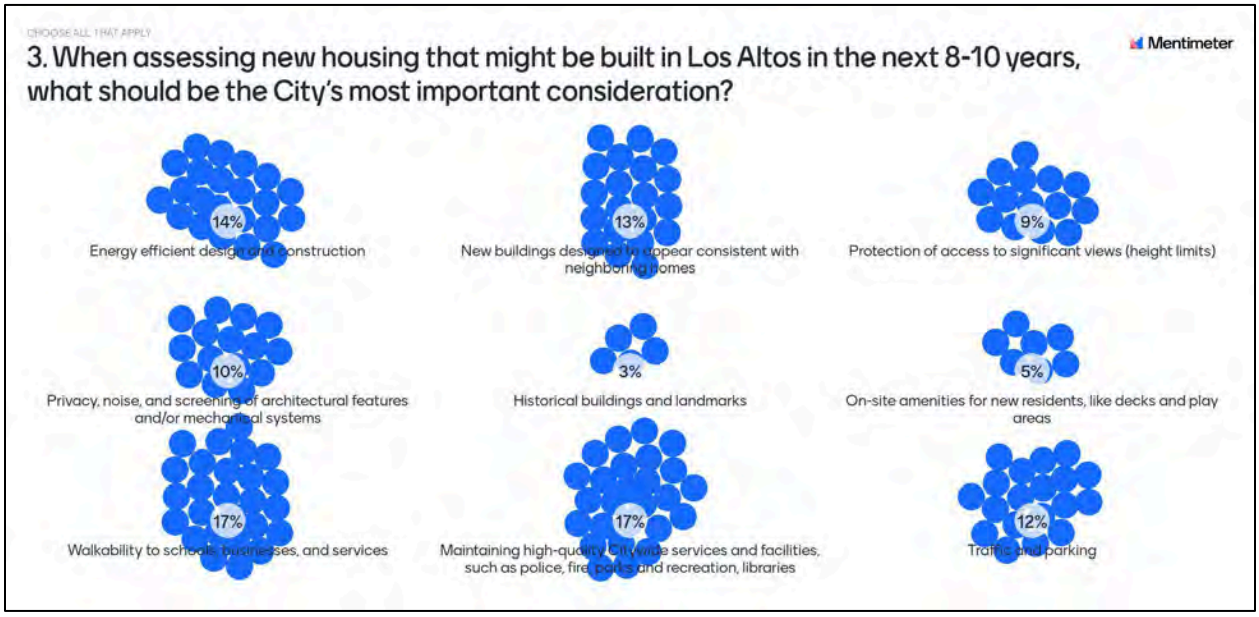
Verbal Comments | Questions

- Walkability, ability to access services
- Landscaping and others stops housing from being built
- We shouldn't throw out all the rules regarding parking, traffic, privacy, and others. They need to be factored in and not ignored.
- Be creative in maximizing housing
- Focus on areas where there is transportation
- Supporting ADU's and duplexes
- Small town feel, low the greenery
- Hope that the housing takes into consideration that people spend a lot of money to live in Los Altos
- Taking that into consideration and not just those that the State needs to accommodate

Chat Comments | Questions

- We should remove the historic review for SB9 development.
- Important: Get rid of barriers such as parking requirements, lengthy approval times (6-10 months for an ADU?), abusive requirements about historical resources
- Jill-historic review is required by the state. thank goodness since too many people believe in bulldozing the past
- Historic review is NOT required by the state, nor is it required by the city ordinance
- Dense housing also has the benefit of using less water.
- I work with clients who have

Example of notes taken on virtual whiteboard during the small group discussion



Example of Menti Poll results on virtual whiteboard during the small group discussion

Small Group Discussion Prompts

1. *What do you think are the most critical housing issues in Los Altos?*
2. *What do you think are the housing types most needed in Los Altos?*
3. *When assessing new housing development that might be built in Los Altos in the next 8 to 10 years, what should be the City's most important considerations?*
4. *Is there anything else that you would like to share about why you are here this evening? Any questions, comments, or additional housing opportunities we should be aware of?*
5. *Do you have any suggestions for what groups should be reached out to, to solicit additional feedback on the Housing Element Update?*

LOS ALTOS HOUSING ELEMENT

Main Takeaways

What do you think are the most critical housing issues in Los Altos?

- The permit process for ADU's needs to be improved and expedited from its current state. (2)
- Concerns that with added housing units, there hasn't been thought into the services to support this new population growth and the impacts on surrounding residents/businesses. (2)
- Turning vacant homes throughout the City into rental units and other creative policies should be looked at to provide additional housing. (2)
- The existing zoning policies do not allow for the additional housing units needed to meet RHNA. (1)
- Affordable housing for low and middle income families is needed to support local businesses that currently commute from outside the City/County. (1)
- It is important to preserve the R1 – Single Family Zone and explore other zoning areas to add additional housing stock to meet the RHNA numbers. (1)

What do you think are the housing types most needed in Los Altos?

- Allow for a variety of dense low/middle income housing in places that are less intrusive and can accommodate you families and those who work in Los Altos. (3)
- Desire for more ADU's with a streamlined process. (1)
- Affordable multifamily housing located close to transit opportunities is highly desirable. (1)
- Senior housing is desired to accommodate the aging population. (1)

When assessing new housing development that might be built in Los Altos in the next 8 to 10 years, what should be the City's most important considerations?

- Keep the charm and quaint feel of Los Altos that many residents have moved to the area for. (2)
- Provide a mixture of affordable housing for those in the service industries including firefighters, City staff, and teachers. (2)
- Focus new housing in areas with transit options and create walkable neighborhoods with access to services. (2)
- Prioritize a housing stock that serves young families, low income, the disabled and seniors. (1)
- Make sure there is a timely entitlement process for building new housing units. (1)
- State and local programs should be created to increase affordability without building all new units. (1)

Is there anything else that you would like to share about why you are here this evening? Any questions, comments, or additional housing opportunities we should be aware of?

- The City needs to do more outreach than they are currently doing to reach in need populations that may not be captured in the current noticing.

LOS ALTOS HOUSING ELEMENT

- Utilize the data collected to create realistic housing goals and policies that address affordable and diverse housing. (2)
- Don't compromise the quality of life in Los Altos to meet the number of housing units needed. (2)
- Plan for infrastructure and other needed improvements that come with additional housing and population growth.

Do you have any suggestions for what groups should be reached out to, to solicit additional feedback on the Housing Element Update?

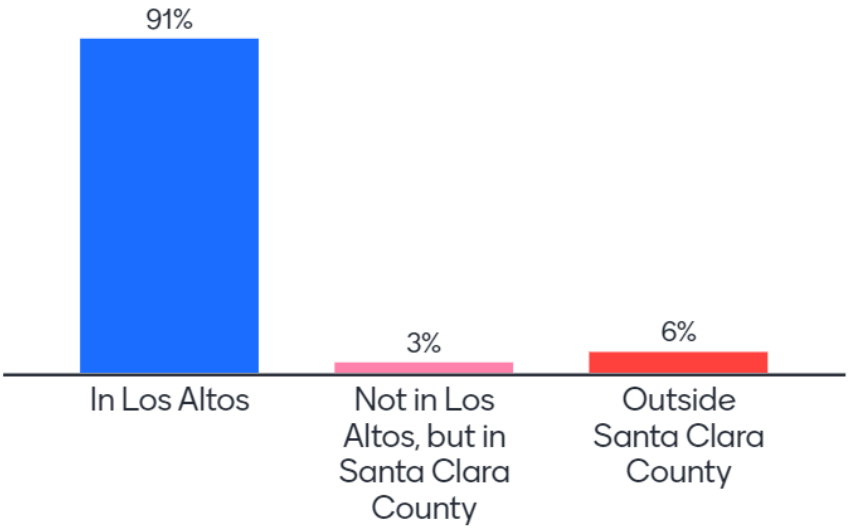
- None noted.

LOS ALTOS HOUSING ELEMENT

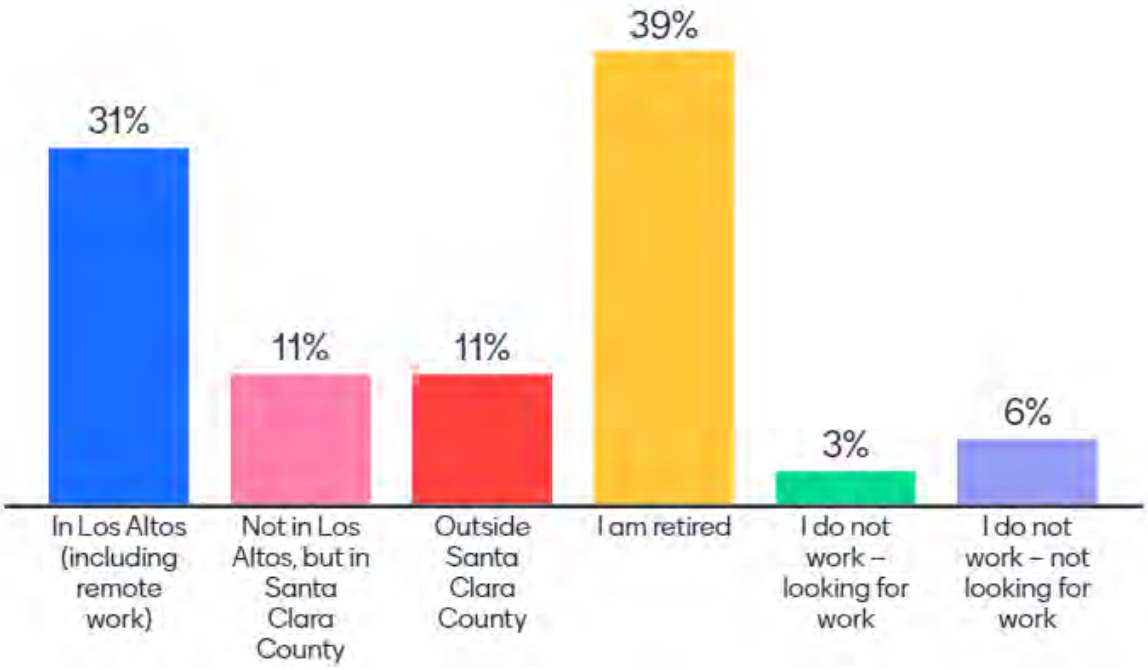
Appendix

DEMOGRAPHIC LIVE POLL RESULTS

1. Where do you live?

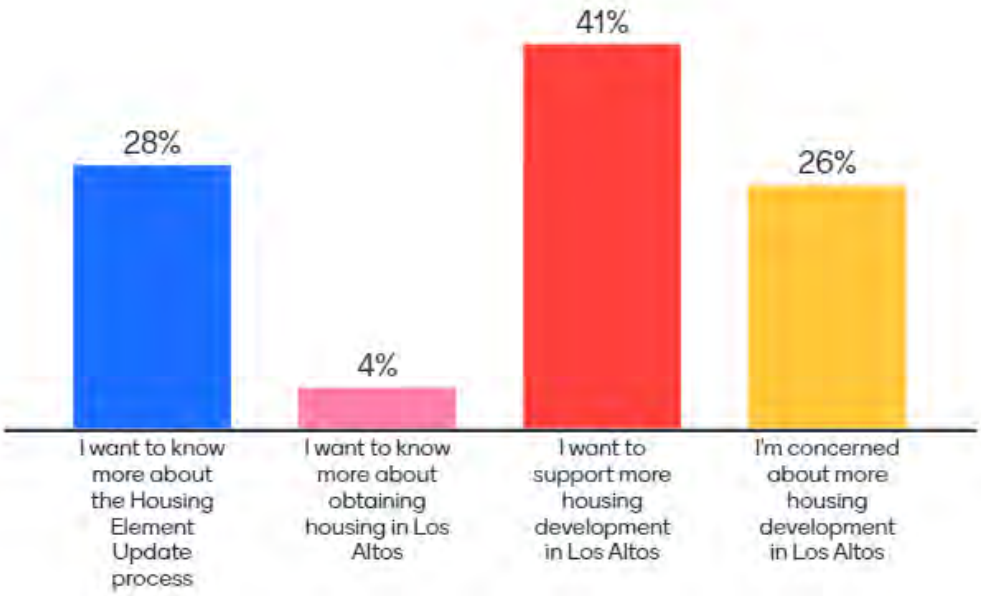


2. Where do you work?

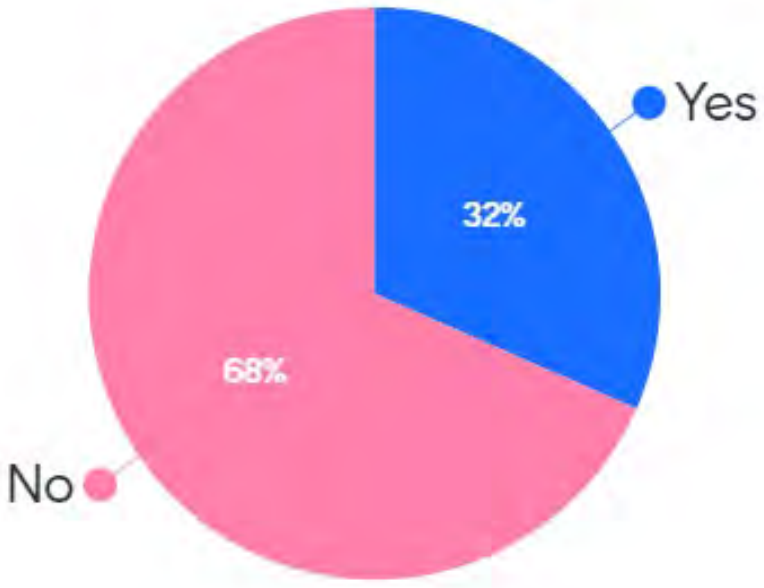


LOS ALTOS HOUSING ELEMENT

3. Which of the following describes why you decided to attend tonight's workshop? (select all that apply)

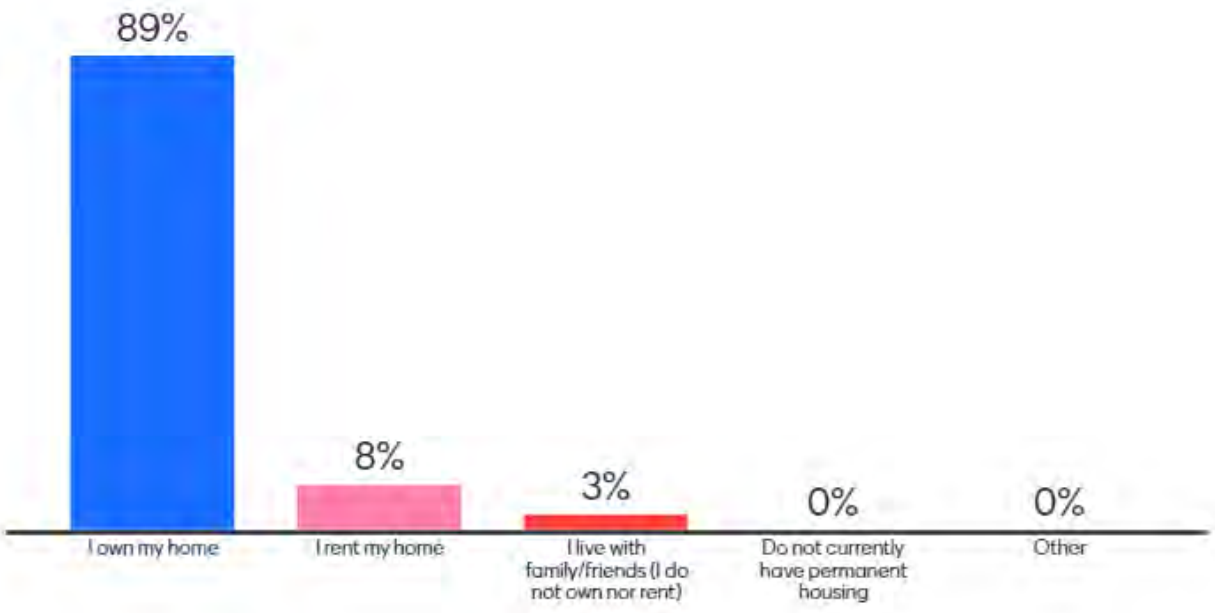


4. Have you participated in other Housing Element events?

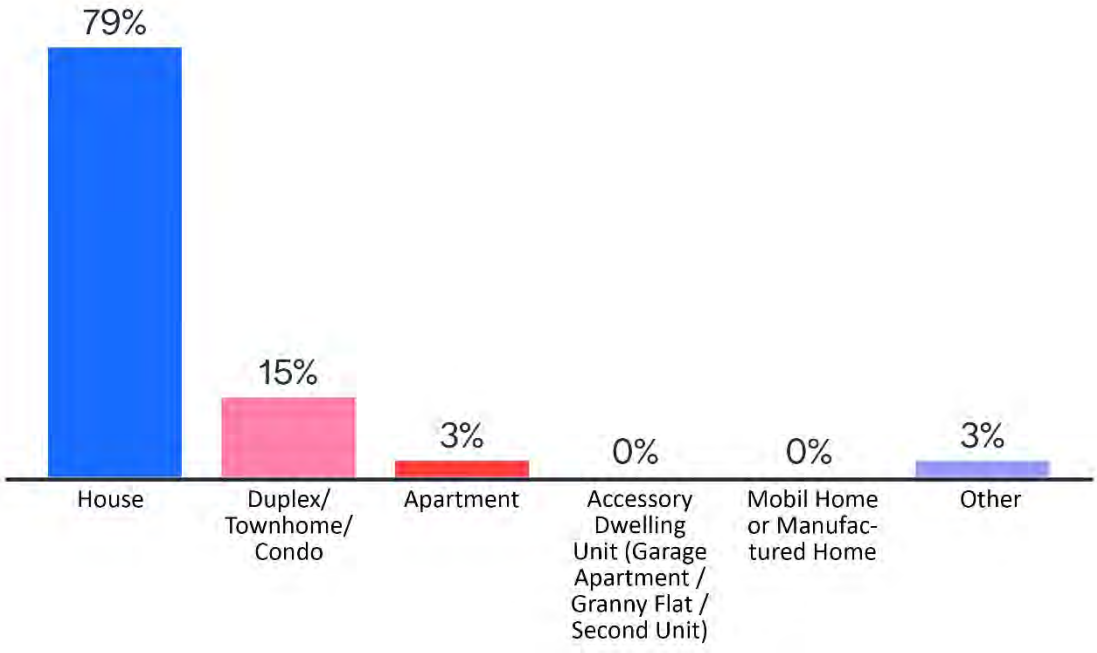


LOS ALTOS HOUSING ELEMENT

5. What is your current housing situation?

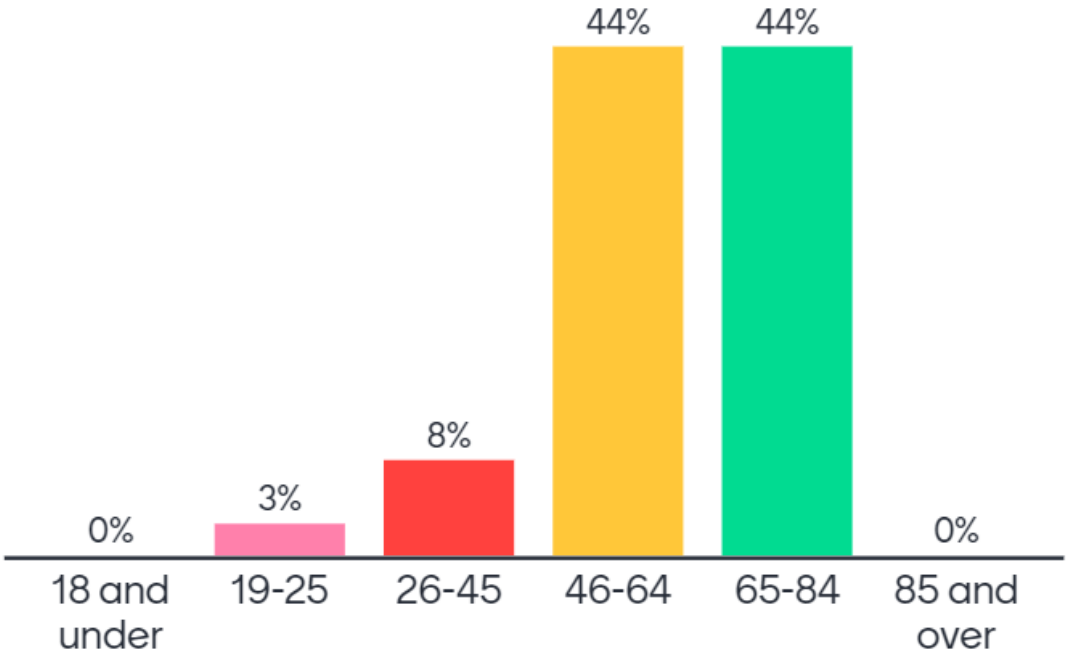


6. What type of housing do you live in?

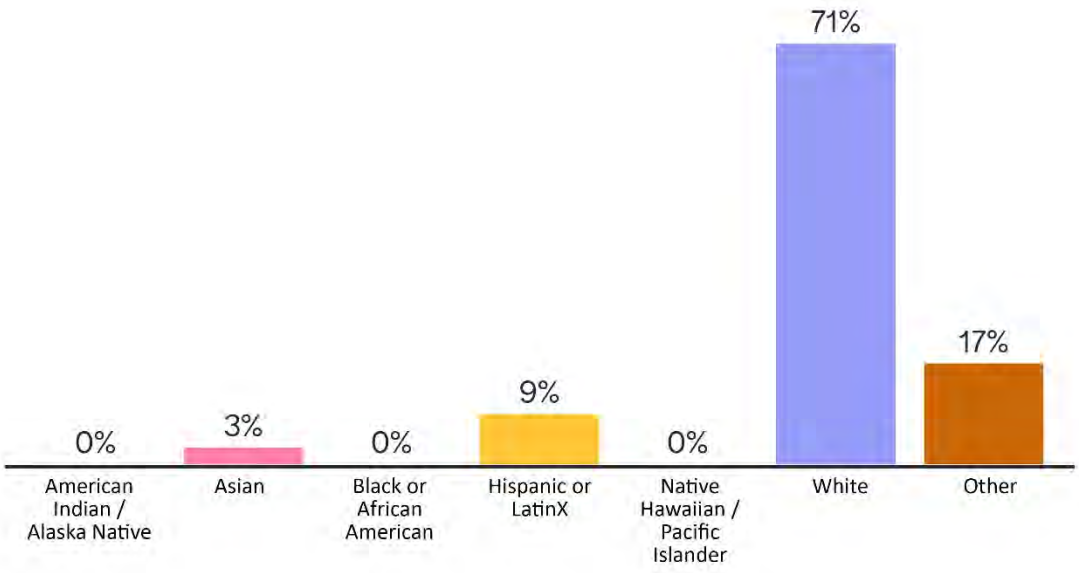


LOS ALTOS HOUSING ELEMENT

7. What is your age?

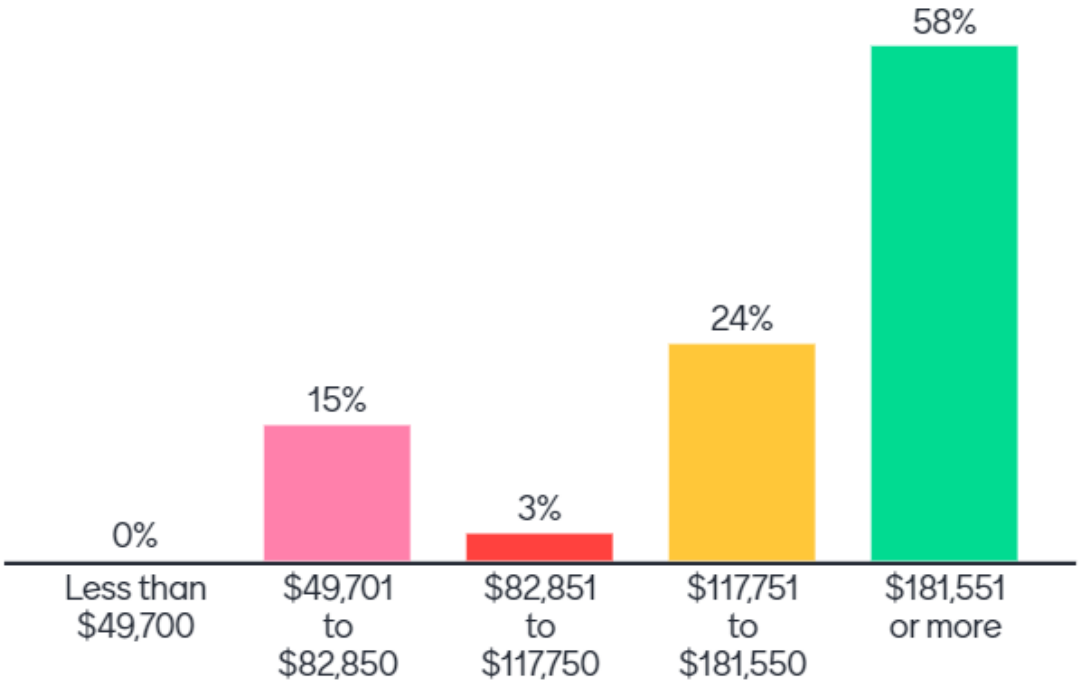


8. Race and Ethnicity



LOS ALTOS HOUSING ELEMENT

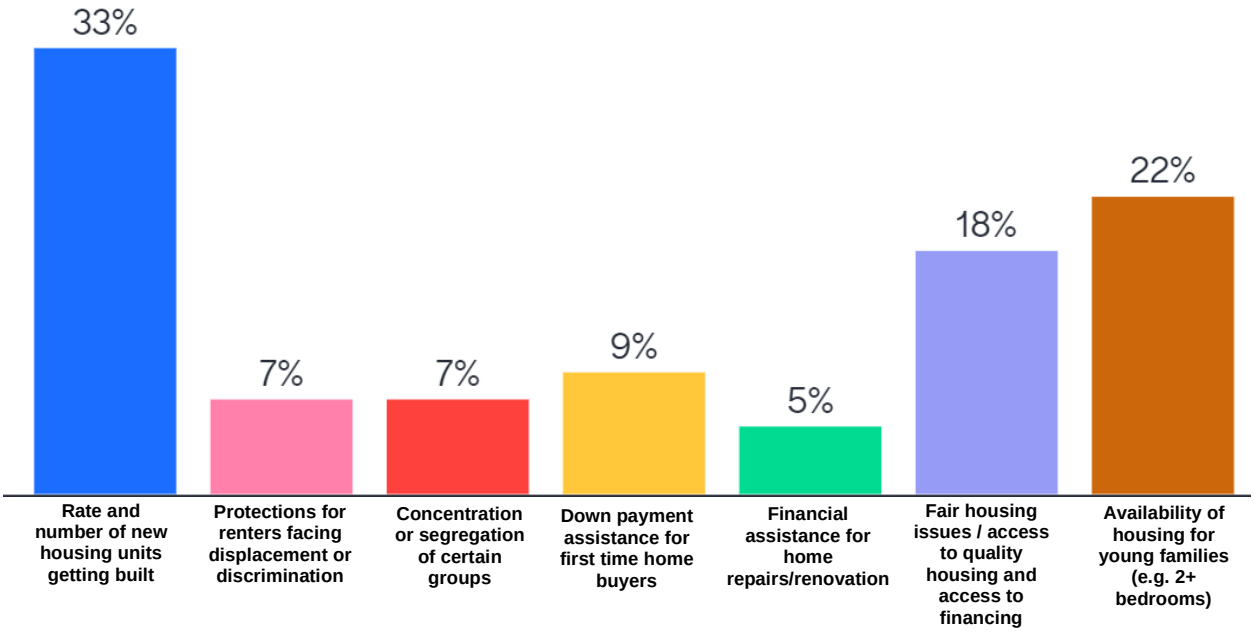
9. Which bracket best describes your household income?



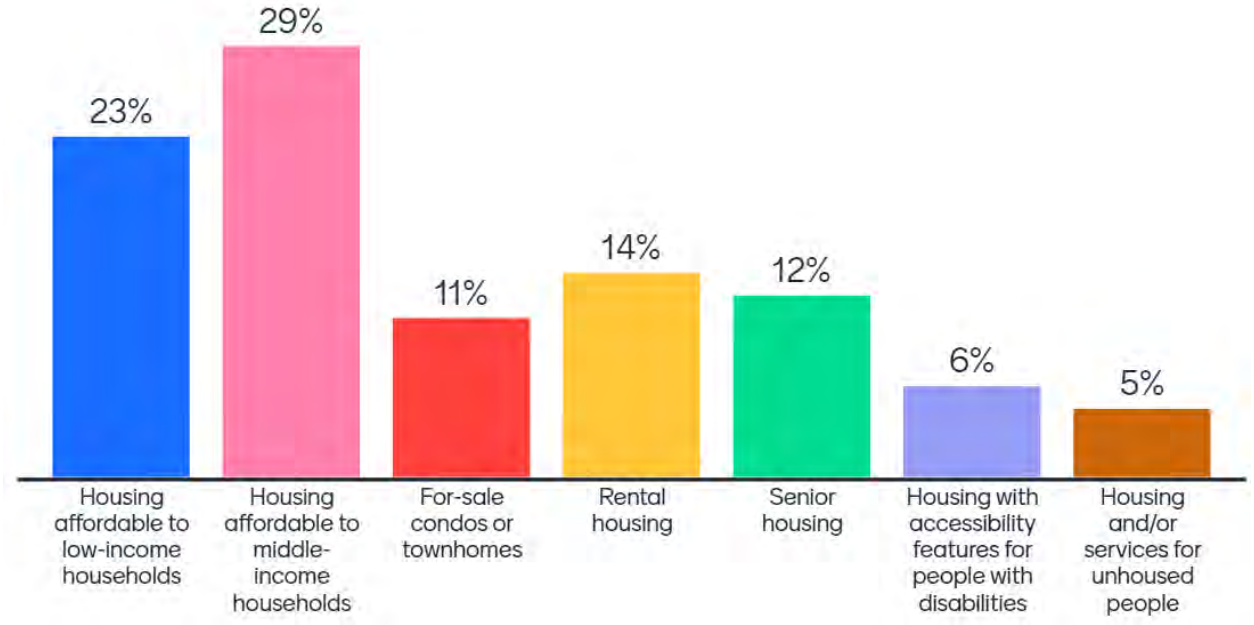
LOS ALTOS HOUSING ELEMENT

HOUSING IN LOS ALTOS LIVE POLL RESULTS

1. What do you think are the most critical housing issues in Los Altos?

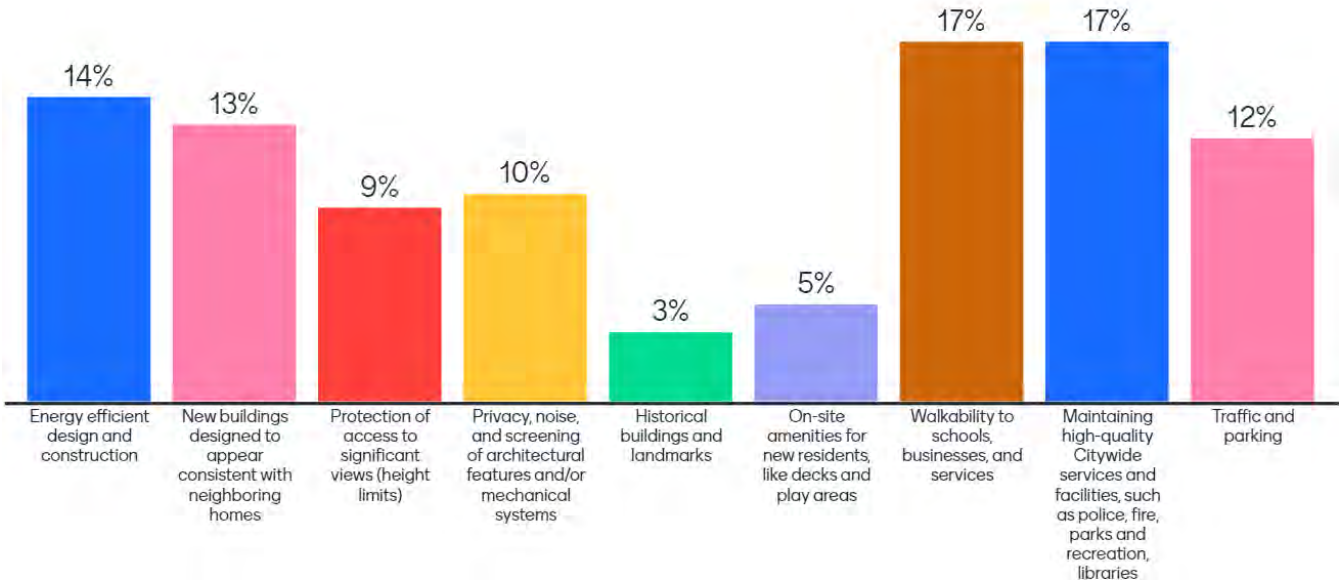


2. What do you think are the housing types most needed in Los Altos?



LOS ALTOS HOUSING ELEMENT

3. When assessing new housing that might be built in Los Altos in the next 8-10 years, what should be the City's most important consideration?



CHAT COMMENTS/QUESTIONS

- Is this the 1st Housing Element Mtg for Los Altos? Plse advise.
  - ***Response:*** *This is the first Community Workshop. There have been some pop-ups and small group meetings already.*
- Is there a problem with logging on? A friend is having trouble getting into this meeting
- Every house is a house!
- Not just single detached homes
- Salim-argue with Websters
- Is there a Middle Eastern/North African category on the race/ethnicity question? This community comprises a large proportion of Los Altos residents - important to consider for future polls
  - ***Response:*** *In census terms these ethnicities are racially white White – A person having origins in any of the original peoples of Europe, the Middle East, or North Africa*
- Will the poll results and presentation be posted online? When?
- I am so excited about this process!
- Agree Jeanine!
- Hi Julie! I just heard from Adobe Pet Hospital; they are cutting off all service after 5pm due to inability to staff!
- How many ADUs were permitted in Los Altos in 2021?
- Loved the centerfold ad for the Housing Element in the Town Crier today! Great job Bruce and the HE team!
- We need homes for all different stages of life

LOS ALTOS HOUSING ELEMENT

- I read (on the HE website I believe) about a pop up at Woodland Library but when I went there at the time announced, the library was closed and when I got home the announcement was removed from the website. What happened??
- 1/2 acre or lower income sites?
- multi-family
- Low income sites have to be half an acre or higher Because you can't afford to build an affordable building on less
- Younger families, workers, diverse cultures all increase our city's vitality and ensure we're a full-attribute City 25 years from now.
- Please explain 1/2 acre required for low income? How many units on that?
- I still don't see any explanation how this works.
- Could folks who are talking introduce themselves? There are no names on the photos
- Will housing in the middle be addressed?
- How are lower income units funded? Does the state provide funding?
- I signed up a long time ago for the newsletter/announcements from the HE website. Why have I received nothing except an announcement about tonights meeting? Why aren't the popups announced (maybe a day before)?
- I am answering many of these questions based upon the rhna requirements being imposed on los altos. it is not what I necessarily believe
- nothing about mass transit?
- or bikeability
- I understand that there is a law that dictates what HCD thinks needs to built in LA. My question is, do Los Altos residents want this growth?
- Apparently we do, Barry. Did you look at the poll results?
- Barry-I am not convinced most residents want increased growth in density and height
- we need this growth
- Anne-self selecting group. fifty people do not a city make
- Jeannie-we don't need the growth, we are forced to accept it
- I heard about some communities where churches are partnering and providing space on their properties for high density affordable housing- sounds innovative and a win-win.
- @David, @Jen, I have been on 100+ zoom meetings without any issues with audio. Most everyone knows how to use Zoom. Why did you choose to introduce a likely totally-new environment of Ring Central?
- It would be great if some of the Los Altos churches wold step up and provide housing, or even safe parking. I hope they do.
- Programs will be key. Programs, programs, programs!
- it would be great if all those supporting more affordable housing if they sell their homes to someone in need at a below market price. That would facilitate more home ownership by those who cannot afford current prices
- Some cities fine owners of ghost houses.
- Hey Jon, I did just that with my second home!!!
- Jeanine-great. wish more folks would do likewise
- I would ask the housing element to address higher density and alternative zoning/uses on church properties and possibly school properties too. Would be nice to see some creative open-minded

thoughtfulness on that. We need to get much more creative to support building more housing and the extra housing, at higher densities is important. I would like to see us be more aggressive on housing, especially below market rate housing.

- SOOO excited that Los Altos is talking about how to do this!
- I would like to see more folks from differernt perspective participate in future meetings
- Will presentation and notes be on the website?
- We are still incredibly high-level and vague. I would like to see two or three examples of how to achieve lower income housing
- Our breakout group had different perspectives. But in the end virtually all want more housing. That's representative of the city, I would guess. There were a lot of new faces here tonight.
- I would also like to start looking at zoning maps to discuss upzoning

LOS ALTOS HOUSING ELEMENT

Community Workshop #2

Format: Zoom Virtual Meeting | March 1, 7:00-8:30pm

The purpose of the Housing Element Update Community Workshop #2 was to provide an overview of the Sites Inventory Analysis and gather input from meeting participants about the key screening criteria, key assumptions, and policy considerations that informed the site inventory. Feedback will inform the refinement of the site inventory and will guide the preparation of the Housing Element Update.

The community workshop was held via Zoom on Tuesday, March 1 from 7-8:30 pm and was facilitated by City staff and the consultant team (Lisa Wise Consulting, Inc. and Plan to Place). All materials were made available and posted on the project website prior to the meeting. Approximately 150 households attended the meeting. The meeting agenda is outlined below:

1. Welcome & Introductions
2. Agenda & Logistics
3. Presentation on Site Analysis
4. Group Q&A
5. Overview & Opening of Breakout Rooms
6. Breakout Rooms Report Back
7. Closing and Next Steps

ATTENDANCE

Meeting participants: approximately 150 households

City Staff

- Laura Simpson – *Interim Planning Director*
- Sonia Lee – *Public Information Officer*

Consultant Team

- **Lisa Wise Consulting, Inc.** – David Bergman, Jennifer Murillo, Stefano Richichi, Olivia Salter
- **Plan to Place** – Dave Javid, Paul Kronser, Rachael Sharkland

LOS ALTOS HOUSING ELEMENT

WORKSHOP SUMMARY

Laura Simpson opened the meeting by welcoming attendees and introduced the team. Dave provided an agenda overview and conducted the demographic live poll. The following is a summary of the results from the demographic poll that was administered at the beginning of the meeting:

Demographic Live Poll (full results in the appendix)

1. **What is your age?**
    - 2% are 18 and under
    - 2% are 25-44
    - 52% are 45-65
    - 43% are 64-84
    - 2% are 85 and over
2. **What is the primary language spoken in your house?**
    - 97% speak English
    - 2% speak Cantonese
    - 2% speak Vietnamese
3. **Which category best describes you?**
    - 2% identify as American Indian/Alaska Native
    - 13% identify as Asian
    - 2% identify as Black or African American
    - 6% identify as Hispanic or LatinX
    - 71% identify as White
    - 6% Other
4. **Where do you live? (select one)**
    - 95% live in Los Altos
    - 3% live in Santa Clara County but not Los Altos
    - 2% live outside of Santa Clara County
5. **Where do you work?**
    - 29% work In Los Altos (including remote work)
    - 28% do not work Los Altos, but in Santa Clara
    - 6% work outside Santa Clara
    - 34% are retired
    - 2% do not work or are looking for work
    - 2% do not work and are not looking for work
6. **If you work in Los Altos, how long is your commute?**
    - 31% travel less than 20 minutes for work
    - 6% travel 20-30 minutes for work
    - 2% travel 40-50 minutes for work
    - 39% don't work in Los Altos
    - 22% Other

LOS ALTOS HOUSING ELEMENT

7. **If you live in Los Altos, what is your current housing situation?**
    - 97% own a home
    - 2% live with family/friends (don't own or rent)
    - 2% don't live in Los Altos
8. **If you live in Los Altos, how long have you lived there?**
    - 3% have lived in Los Altos for 3-5 years
    - 6% have lived in Los Altos for 6-10 years
    - 89% have lived in Los Altos for 10+ years
    - 2% don't live in Los Altos
9. **If you live in Los Altos, what kind of housing do you live in?**
    - 88% live in a house
    - 9% live in a duplex/townhome/condo
    - 2% don't live in Los Altos
    - 2% other
10. **Have you participated in other Los Altos Housing Element events?**
    - 54% no
    - 46% yes

After the poll closed, Jennifer Murillo from Lisa Wise Consulting, Inc. (LWC) gave a presentation that included a brief overview of the Housing Element, but focused primarily on the approach for the Sites Inventory Analysis. The Housing Element Overview included background, purpose, update process, and state requirements.

Jennifer then provided an explanation of the key screening criteria and assumptions that informed the sites analysis and policy considerations for providing additional housing capacity. To guide feedback, the policy considerations were divided into five topics including the Commercial Thoroughfare zone (El Camino Real), the Public and Community Facilities Zone (focused on the properties of Los Altos United Methodist Church, Los Altos Christian Schools, and vacant property at Grant Road and Fremont Avenue), the Office Administrative Zone (primarily along San Antonio Road east of downtown and on Los Altos Oaks), the Commercial Retail Sales Zone (in the downtown area focused on Main Street and State Street), and the area of the Loyola Corners Specific Plan. Each of the areas was illustrated with a map(s) and included a question that was used as a discussion prompt for the breakout rooms (see below). This was followed by an opportunity for any clarifying questions from the meeting participants through the virtual chat feature. To find a list of all the comments and questions asked, please see the Appendix.

Following the presentation portion of the workshop, Dave gave an overview of the small group breakout room logistics and then opened the rooms which participants were randomly assigned. A facilitator and note taker from the project team were assigned to each breakout room. The project website (https://www.losaltoshousing.org/) currently houses an online feedback form to allow members of the community that did not participate at the workshop an opportunity to provide input. These online responses will be collated and added to this summary.

LOS ALTOS HOUSING ELEMENT

MAIN ROOM CHAT SUMMARY

The summary below captures takeaways from the main room chat that was open to participants before breaking into small groups. These comments and questions do not pertain to specific discussion prompts, but have been organized into broad themes. In response to the participants' request for a complete record of the meeting chat, a transcript of all of the comments and questions from the main room that were fielded during the upfront presentation can be found in the Appendix.

Main Takeaways

Request for more information and/or clarification regarding site inventory

- Request for explanation of and interest in contesting RHNA numbers.
- Request for a spreadsheet of the site inventory with addresses and capacity.
    - Are the identified sites sufficient to meet the RHNA target?
- Request for clarification on assumptions that went into site selection and feasibility of sites being developed.
    - Is there any evidence that the churches are interested in developing housing?
    - Is Los Altos going to invoke eminent domain in order to force current businesses out?
- Request for what constitutes "substantial evidence" that the city must provide to show that non-vacant sites can be developed.
- Desire to understand how property owners and their willingness to sell impacts the site analysis.
- Confirm viability of developing housing on parking plazas.
- Confirm feasibility of alternatives to increasing parking (underground parking, shuttles to reduce VMT).

Suggestions for future workshops

- Desire to see more diverse participants, especially those that will be most affected by the proposed changed zoning (e.g. below 45, renters, young families, and professionals).
- Request for more time in the breakout rooms with fewer questions so discussion can be more in depth.
- Clearer maps so feedback can be more directed.
    - Do you realize that we can't read these zoning maps (street names illegible)?

Request for more information about BMR housing

- Clarification request for BMR requirements as they impact density bonuses and additional height.
    - When you remove caps, and assuming BMR units are included in a project, can developers add another story for a total of 4 stories?
- Concern that BMR housing is concentrated in one location (South Los Altos).

LOS ALTOS HOUSING ELEMENT

- More information about specified rental/purchase rates for very-low income units.
- Request for identification of developers that will build BMR units.
    - Please provide specifics of how 501 very-low income units will be built? What are the specified rental/purchase rates? Which identified developers might build these and where?

Advocacy for housing if coupled with other amenities, services, and infrastructure

- More information on how urban transit infrastructure, amenities, and schools will be part of the planning process.
    - Where will the new schools for new residents be located?
- Support for mixed-use buildings with commercial/ retail on the ground floor and housing above.
    - Can we convert commercial zones to mixed use?
- Support for the City to establish large-scale upzones, rather than parcel by parcel.

Opposition to increased density

- Opposition to additional height generally and its impact on the neighborhood.

Commercial Thoroughfare (CT) District

- Support for increasing density in the downtown area.

Community Facilities Zone (Including Grant Road and Fremont Avenue)

- Grant and Fremont, northeast corner, would be better served by an open space and a bike lane for bicyclists to get them away from the commuter Fremont/Grant road traffic.
- Concern that developing housing at Grant and Fremont will change neighborhood character, will cause more traffic congestion and is isolated from services.
    - Why are we considering the Grant/Fremont and the Magdalena churches, and other areas, which will just contribute to more traffic and disrupt existing neighborhoods?

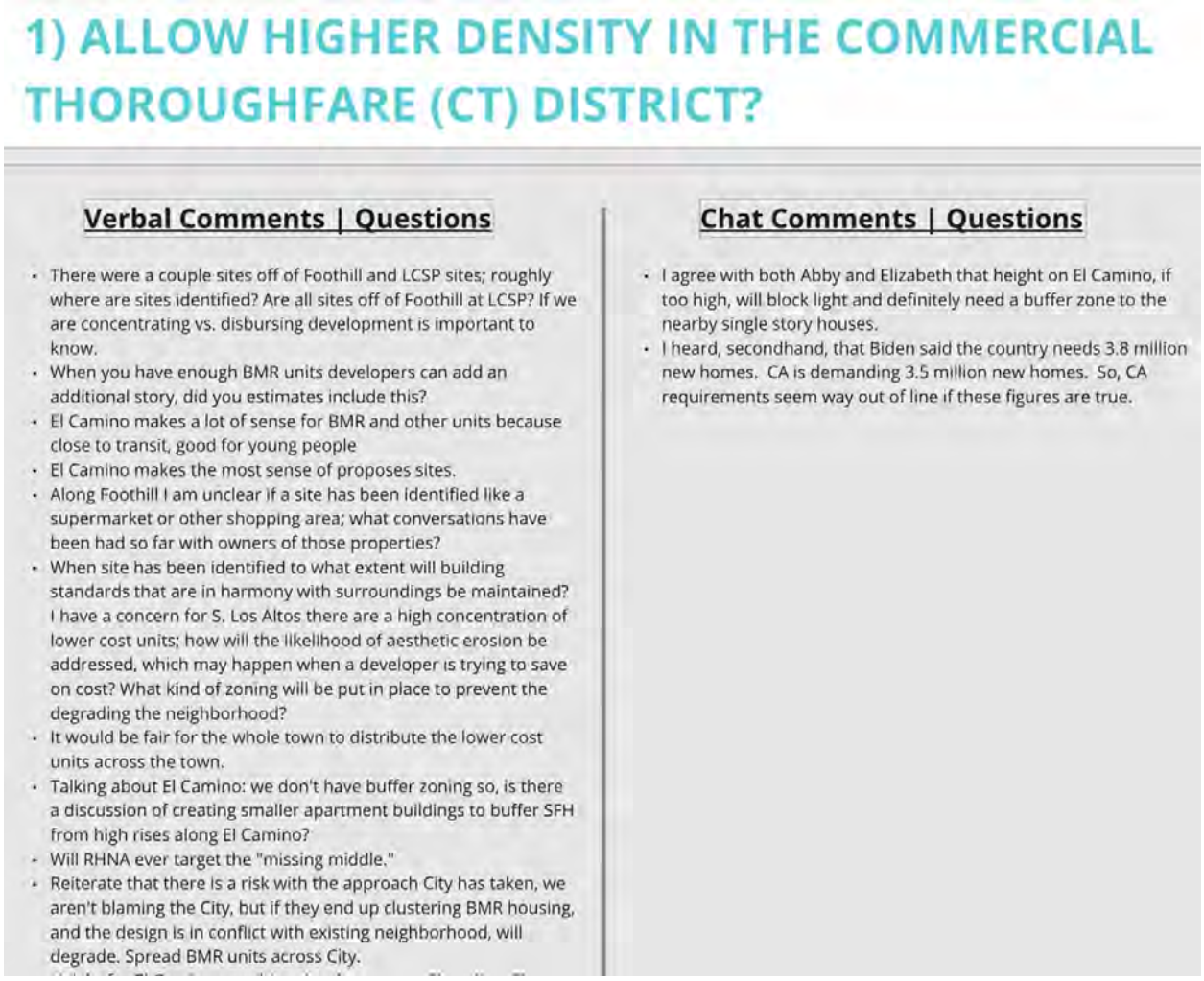
Loyola Corner Specific Plan (LCSP)

- Concern for developing LCSP because height and traffic may disrupt existing character.
    - How will parking be accommodated at LCSP?
- Support for more housing and services at LCSP.

LOS ALTOS HOUSING ELEMENT

SMALL GROUP DISCUSSION SUMMARY

The remainder of the meeting was devoted to gathering input from meeting participants through facilitated small group discussions. Feedback was recorded in four breakout rooms on a virtual whiteboard (see snapshot below) in response to the discussion prompts below. The summary below provides a high-level overview of themes that emerged from the small group discussions. The numbers in parentheses indicate the number of breakout rooms in which the referenced comment was expressed. A full transcript of all of the char comments from each breakout room can be found in the Appendix.



Example of notes taken on virtual whiteboard during the small group discussion

LOS ALTOS HOUSING ELEMENT

Small Group Discussion Prompts

1. *Allow higher density in the Commercial Thoroughfare (CT) District?*
2. *Allow residential uses on certain Public and Community Facilities (PCF) zoned parcels?*
3. *Allow residential uses in the Office Administrative (OA) District?*
4. *Establish a minimum density and allow 3 stories (or 100% residential uses) in the Commercial Retail Sales (CRS) District?*
5. *Remove the density cap and allow 3 stories (or 100% residential uses) in the Loyola Corners Specific Plan (LCSP)?*

Main Takeaways

General (not in response to a specific question)

- More information on the implications of CA state laws (SB9, SSB10, SB35) on Los Altos, and how Los Altos will meet the state's requirements for substantive evidence that a parcel can be redeveloped. (4)
- Request for more specific and clear information on site inventory (e.g. addresses with proposed capacity). (3)
- Clarification request for BMR requirements. (4)
- Clarification needed for this discussion to differentiate between height, stories, density, and what ‘multifamily’ means and looks like. (4)
- Concern that high density will negatively impact current residents’ neighborhood aesthetics and real estate investment. (4)
- Concern that BMR housing will be concentrated in certain areas creating "ghettos,” aesthetically poor housing, and/or places that reflect isolation of persons that live in affordable housing. (3)
- Concentrate density where it's already commercially viable, eg. large parcels, or parcels that can be aggregated and are near transit and amenities. (4)
- Up zoning in the El Camino area to increase density is appropriate. (4)
- How is school capacity being taken into account? (3)

Allow Higher Density in the Commercial Thoroughfare (CT) District?

- Density and height should be concentrated along El Camino commercial thoroughfare because it is near transit and services. (4)
- Request to include buffer zoning to mitigate impact of height on El Camino on surrounding SFH neighborhoods. (2)
- Desire to see a traffic study on El Camino that accommodates increased density. (3)
- Request for more information about density bonus as it relates to BMR housing and which developers are interested in building units with presumably these deed-restricted rents. (2)
- Request to include open space near San Antonio in the site inventory. (1)

LOS ALTOS HOUSING ELEMENT

Allow residential uses on certain Public and Community Facilities (PCF) zoned parcels?

- More information about the Fremont and Grant parcel needed to understand what appropriate density would be, whether services could be added to this area, and how traffic would be accommodated. (4)
- No high density on Fremont, may negatively impact existing neighborhood ambiance and kids walk and bike along the street to and from schools. (2)
- Request for more information about how housing would be built on church property and why these sites were selected, and whether loss of churches might have a negative impact on the community. (2)
- Concern that these properties are isolated and not near amenities. (2)
- Support for more housing along Grant and Fremont. (2)

Allow residential uses in the office administrative (OA) district?

- Rancho is a historic structure and serves as a central location for various amenities, don't remove this resource. (3)
- South San Antonio road has small lots that directly impact single family homes, don't increase density here. (2)
- San Antonio is a good place for housing because it is near transit; commercial on the ground floor and housing above would be appropriate. (3)

Establish a minimum density and allow 3 stories (or 100% residential uses) in the Commercial Retail Sales (CRS) District?

- Support increased density here as long as parking is considered. (1)
- Consider building on top of existing parking garages or on parking plazas. (3)
- Clarification on the height implication of 3 stories (34 or 38', does this include retail etc.). (1)
- Request for a more creative and inclusive approach to neighborhood planning with multiple kinds of housing. (1)
- Concern about design standards and setbacks. (1)

Remove the density cap and allow 3 stories (or 100% residential used) in the Loyola Corners Specific Plan (LCSP)?

- Consider a tiered approach to mitigate height. (2)
- We have already spent time on this specific plan as a community, why is this being re-opened? (2)
- Yes, to 3 stories here. (3)
- No to 3 stories here, concern about impact on aesthetics and privacy. (3)
- In favor of building on parking lots. (1)

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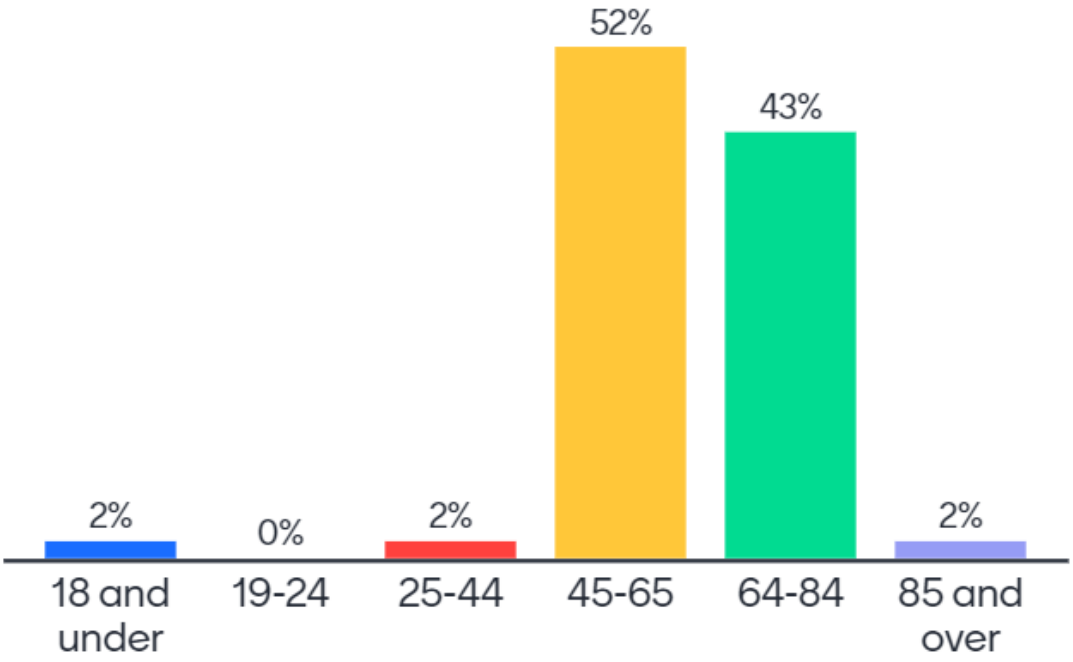
- No high density on Main or First, unless design standards include setbacks to improve the pedestrian experience. (1)
- Concern about intersection and bridge over expressway. (1)

LOS ALTOS HOUSING ELEMENT

Appendix

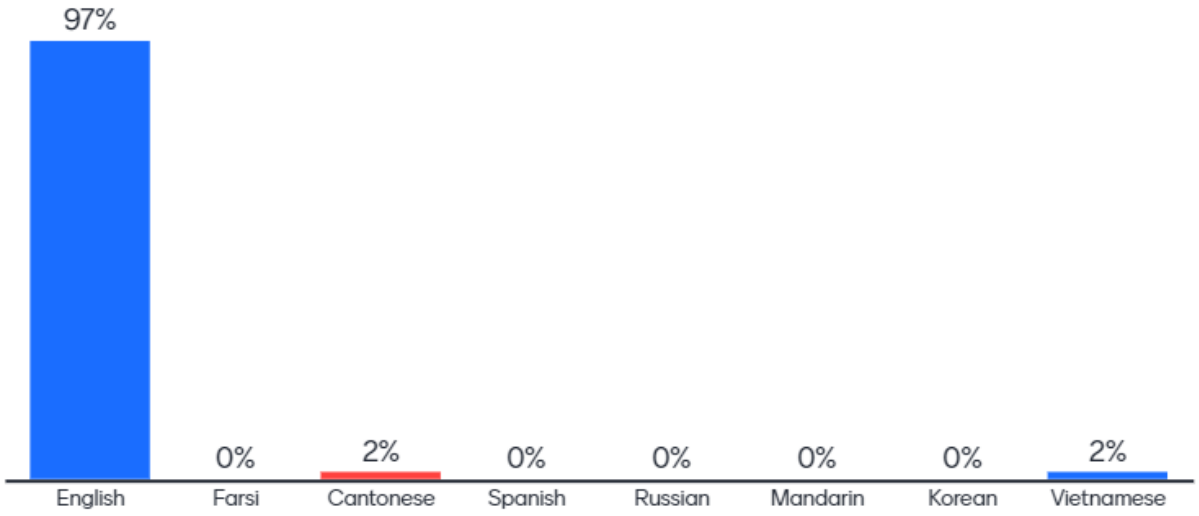
DEMOGRAPHIC LIVE POLL RESULTS

1. What is your age?

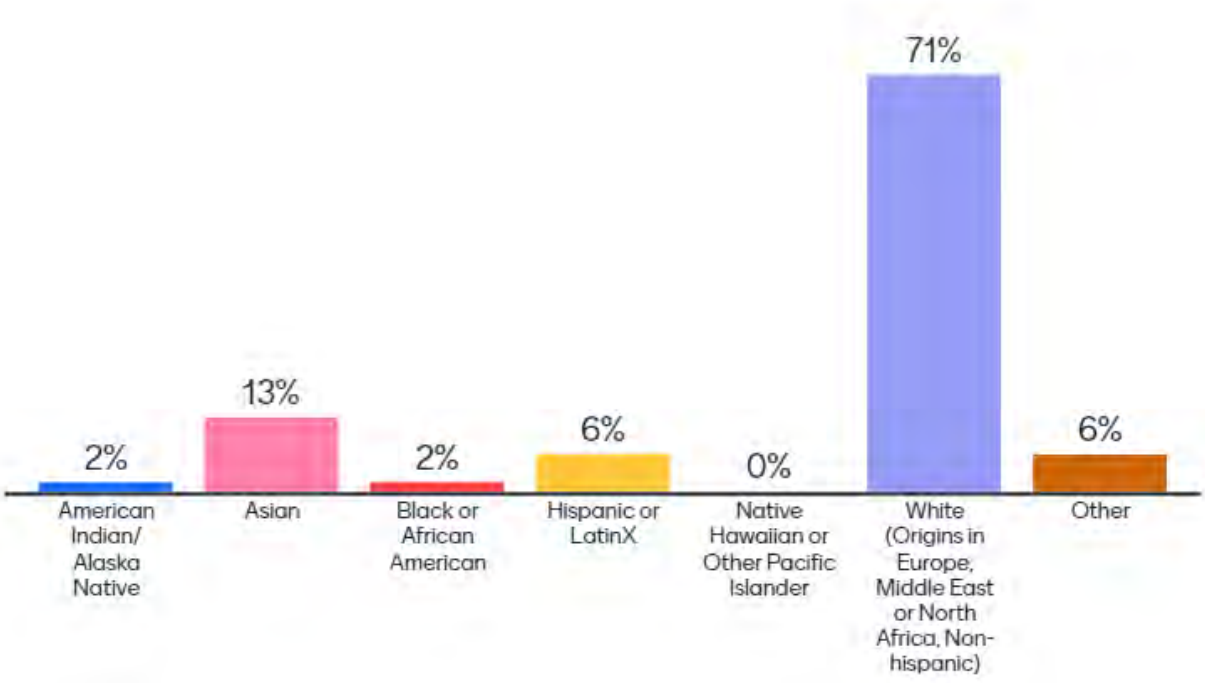


LOS ALTOS HOUSING ELEMENT

2. What is the primary language spoken in your house (Choose all that apply)?

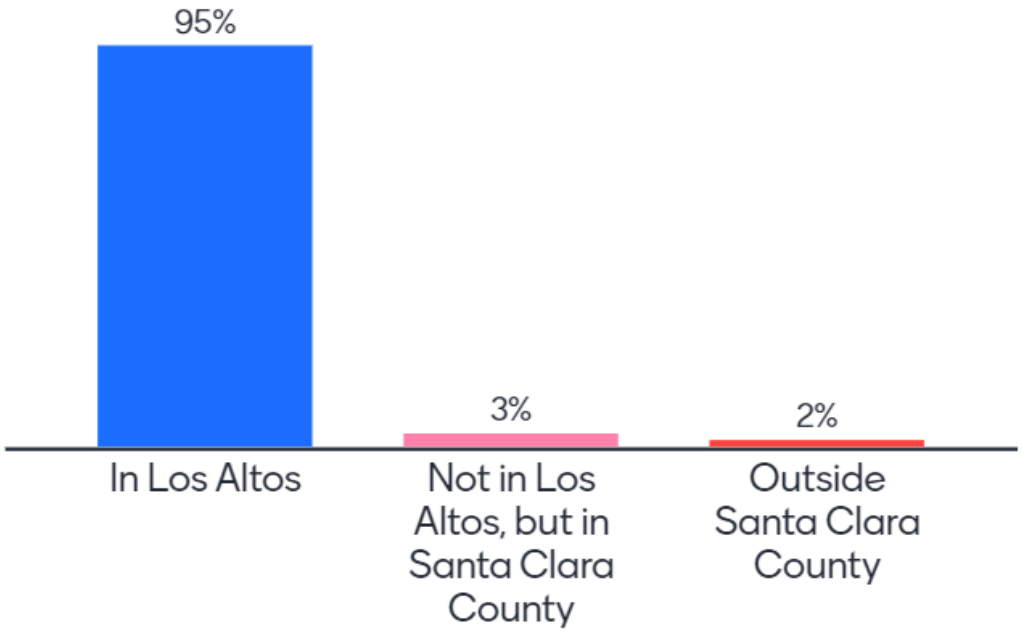


3. Which category best describes you?

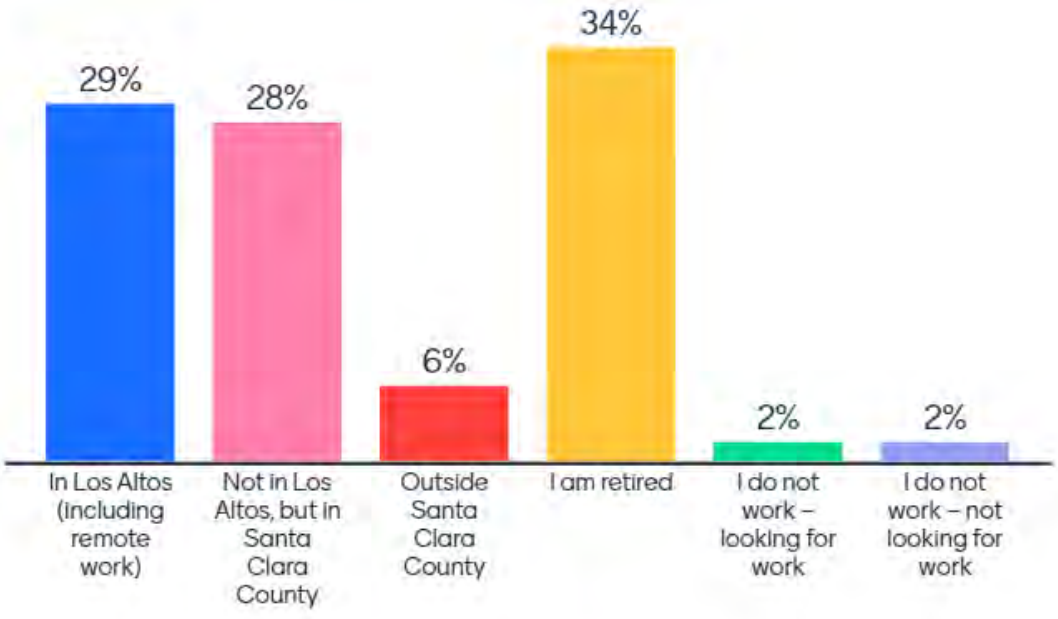


LOS ALTOS HOUSING ELEMENT

4. Where do you live?

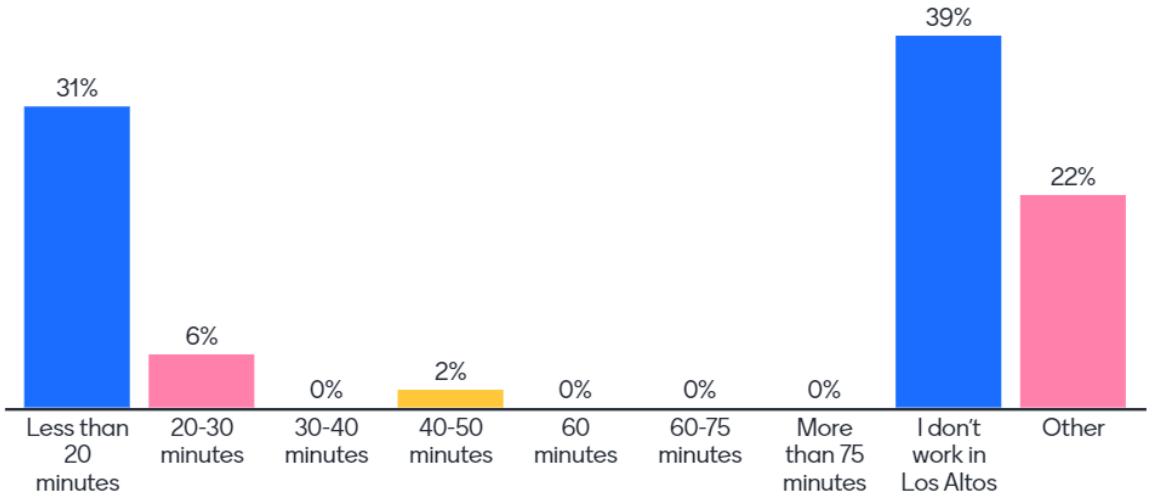


5. Where do you work?

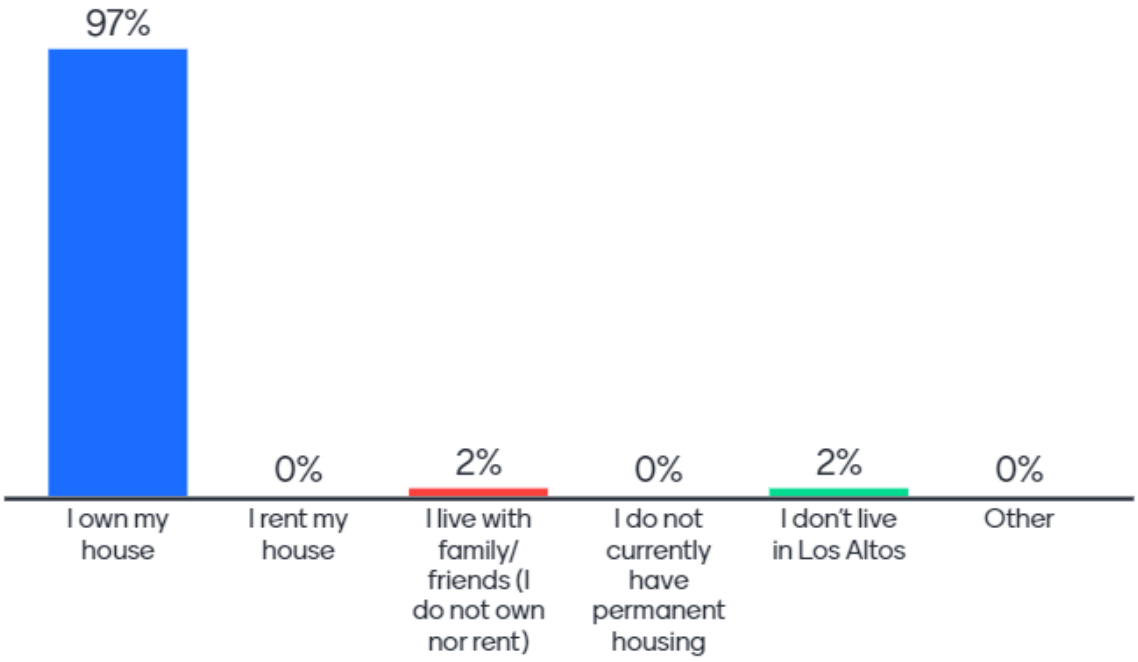


LOS ALTOS HOUSING ELEMENT

6. If you work in Los Altos, how long is your commute?

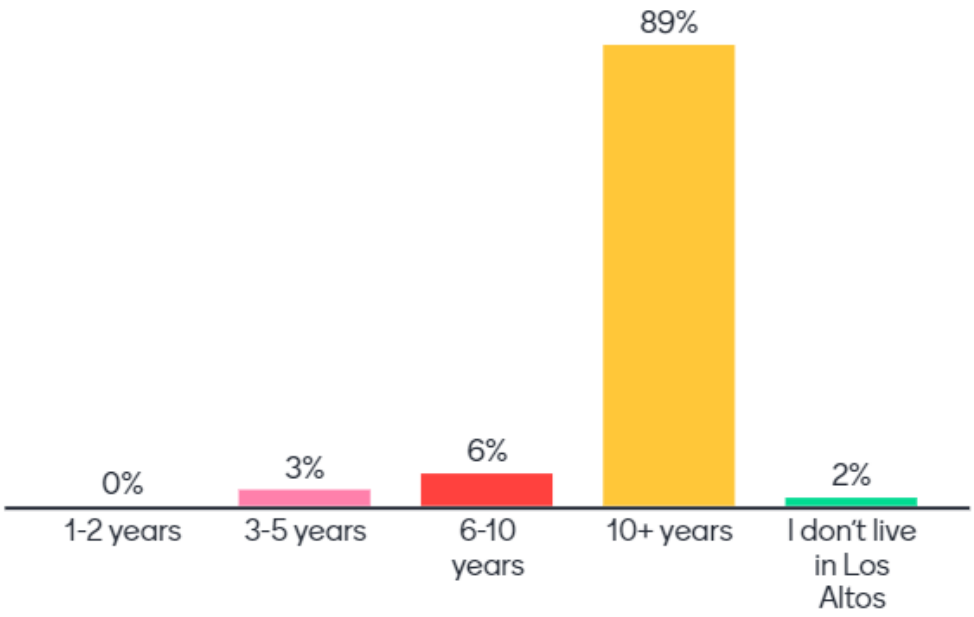


7. If you live in Los Altos, what is your current housing situation?

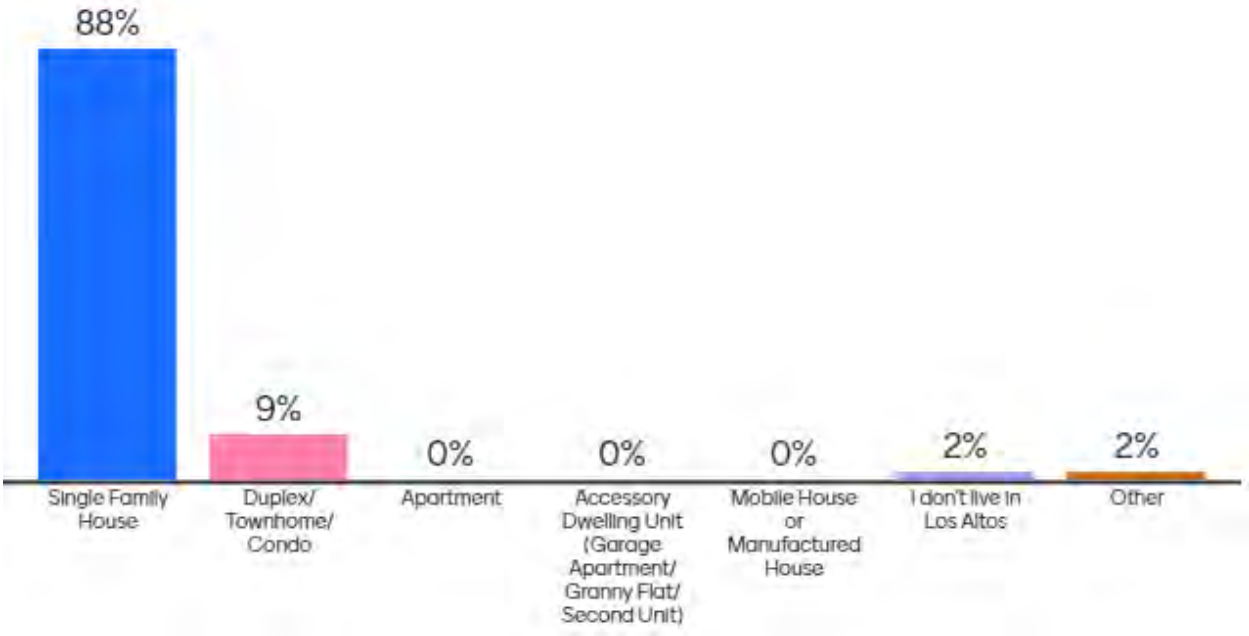


LOS ALTOS HOUSING ELEMENT

8. If you live in Los Altos, how long have you lived there?

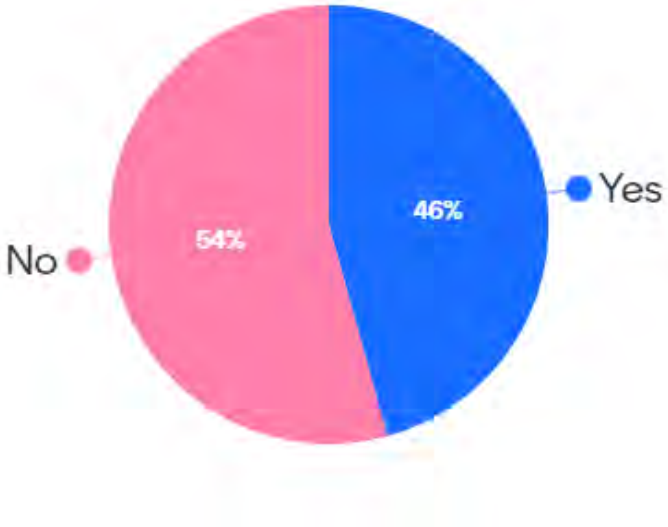


9. If you live in Los Altos, what kind of housing do you live in?



LOS ALTOS HOUSING ELEMENT

10. Have you participated in other Los Altos Housing Element events?



LOS ALTOS HOUSING ELEMENT

TRANSCRIPT OF ALL CHAT COMMENTS

MAIN ROOM CHAT COMMENTS

Can we see the images of attendees while we wait?
What state law is mandating this need for more housing?
Why is English “as expected” the primary language spoken in the homes of L A?
Will the answers to these questions be summarized and distributed?
The most important thing we need tonight is a spreadsheet of the site inventory, even if preliminary, so your community can do independent analysis of whether or not you are meeting the HCD criteria to create a feasible HE. We don't want the state to reject our HE, even at the 1st pass.
I agree with Jeanine. We need to know the preliminary sites, and how many homes are expected out of each site
Outreach has been pretty broad… glad we want beyond the TC!
The slides identify sites and a range of numbers of possible new housing (of each type), but there is no table that summarizes the totals. I think we’ll first see that with the Draft Housing Element.
If we can’t get a legal, feasible housing element, we will be in for lots of legal fees and perhaps lose any local control
How are you talking about numbers, then, if you don’t know what they are? How do you know the preliminary sites are enough?
Since we have no vacant sites of material import, we need to see upzoning everywhere. Upzoning does not mean automatic development. But it does show the state commitment to housing opportunity.
Presentation states " Over 80% of RHNA estimated to be accommodated through existing zoning and ADU's and pipeline projects" Would like to see how consultants arrived to this conclusion/Spreadsheet and Assumptions made (i.e City spoke with property owners that are willing to sell or develop their parcel). Thanks.
Curtis, agree, but we need that spreadsheet sooner.
Who set our RHNA and the percentages, and is there any ability to change it?
MJ Loptin: Every city that has tried to lower their RHNA has failed.
Right, Mircea. If the city thinks 80% of RHNA will be accommodated by existing zoning, then why are we not developing at 80% of our required rate, even for market rate housing

LOS ALTOS HOUSING ELEMENT

What participant Mircea seeks, as do many of us, is the "substantive evidence" the city must provide to show that that non-vacant sites can actually be developed.
because Anne, it is developers who develop properties, not the city
“Substantial evidence"
That 80% number is absurd unless eminent domain will be applied to all strip malls and churches in town.
MJ: Los Altos and many cities appealed to change their allocation and lost that ask. These are our final numbers.
But the exact percentages for the different RHNA categories can be adjusted? Some of those would be quite challenging here
MJ Lopatin: This is all challenging, but together we can rise to the challenge and house the people who work here.
I believe even parking plazas re also considered non-vacant.
MJ: no adjustment of that allocation either, and I agree.
Jon, it is the city, not the developers, who zones at a density that is feasible, or does not. If the city doesn’t zone for enough housing, then the site will not be developed. See the Village Court for an example.
These RHNA numbers need to be challenged. No scientific formula but everyone just seems to accept them. ABAG has a committee made up of local officials, staff and stakeholders. Stakeholders meaning people who have a vested interest.
the parking lots are considered non vacant because cars really do park there and merchants downtown depend upon people coming downtown
There are 4 maps that show where the city is planning, at this point, to locate the RHNA + buffer units. North, North Central, South Central and South. The types of units by income are color coded. Why are the vast majority of low income RHNA units assigned to South Central and South Los Altos - both sections considered South Los Altos. Low Income and Moderate Income housing units should be distributed equally throughout Los Altos.
https://static1.squarespace.com/static/612fc0231c3b5b71bdaee404/t/62195fd6ed5e5671259095b/1645827079609/LWC_LosAltos_HEU_Wkshp2_PPT_Final_022522_w_maps.pdf
The maps are in this link.
As far as I reviewed on what was presented to date is a wishful thinking by hired consultants. Presentation with no backing/data. How would you know how many ADU's will build through 2031? Last 5 years average?/Extrapolation etc. How about how many condominiums projects

LOS ALTOS HOUSING ELEMENT

are upcoming besides what is in a current building-construction phase? Have they talked to property owners and have commitments otherwise is all a big "estimate".
challenging the numbers at this point, based on the bundle of legal precedent that such efforts are guaranteed failures, is a fool's follow. Let's spend our calories solving the housing problem. We don't need lawsuits and loss of local control where developers come in with license to build what they want. Just look at what happened to us with 40Main!
it is a little disappointing that we do not have more 45 and younger and less than 10 participating in this workshop
we have few under 45 participating because most homeowners are older. and young folks, by and large, don't see the value in participating in this process. my kids don't see how they will be able to buy a house anywhere, much less los altos
I agree Freddie
Potential site 61 has significant environmental issues that I think should disqualify it as a potential site at this time. The site has an identified riparian stream flowing into a stormwater detention basin with two dams that prevent flooding of downstream residential areas. It appears that this has not been properly evaluated. This is known as 2100 Woods Lane
Seas of asphalt for parking are a blight, climate-negative, and a waste of space. Put the parking in puzzlers or underground. Make Los Altos more walkable and use shuttles.
I agree that the Woods Lane site is not a good one for housing.
Agree with Freddie
Instead the city could use the large property it owns at the corner of Green Oak Lane and Bendigo Dr
and Jeanine, who will pay for the parking that needs to be built-will you, will the city, cost is 100K per underground space
Agree that we have WAY too much parking downtown and need more green space and mixed use housing, including on existing parcels zoned for commercial only (along San Antonio near 1st)
The people who use the parking should pay for it, that is a great way to disincentivize
way too much parking downtown? yes, right now, but when things go back to a more normal pace, I don't think so
Not everyone can ride a bike!
Elaine-they do-its called parking permits
Jon, we have to move our city forward.

LOS ALTOS HOUSING ELEMENT

The city needs to either commit to putting housing on the parking plazas (and this would be legally binding) or remove them from the sites inventory
Jeanine-that is rhetoric and nonsense. I am asking pragmatic questions and you talk moving forward???
Jeanine - perhaps not everyone agrees about what constitutes “forward.”
The statement that CT/El Camino Real will accommodate properties on El Camino is not correct. The properties identified on the virtual map are not happening/development potential. Those owners are not selling. PAMF specifically.
We need to see the formula that says we need this much housing based people working remotely. We don't have the schools to accommodate this housing.
we are not the first city to do this. If other small-medium cities can do it, why can't we?
Do the Magdalena churches plan on leaving?
we are going to ban religious services so we can get more housing :)
because it’s not what we want for our city?
I hope not
Is there any evidence that either the Methodist church or Bridges have any interest at all in developing housing? I hope they are interested, but when Los Altos Affordable Housing Alliance inquired, they said they were not
Moving forward means preparing our city for the next generations. We 60plus year olds need to think about how damaging to our community it is to be missing two generations behind us in terms of our demographics. The city will lose its vibrancy, its sustainability, and it self-sufficiency for lack of revenue.
Where do you expect cars to be parked near the proposed Loyola Corners development? There is no public transit, so at least 2 cars will be needed for each unit. Also, is Los Altos going to invoke eminent domain in order to force current businesses out?
I was wondering that as well. That's our church
Exactly. City needs to confirm they spoke with the churches.
No eminent domain. That is not how it works.
The housing has to go somewhere. Most likely large undeveloped properties. Wherever there are large spans of asphalt that is underutilized.
Millenials are moving into my neighborhood. They want bigger houses and yards.

LOS ALTOS HOUSING ELEMENT

Downtown needs to be preserved.
It is paramount the city provide "substantive evidence" of feasibility: talk to parcel owners, offer incentives, look at existing leases, etc.as
Millennials who are moving into your neighborhood want what is in your neighborhood, obviously, but that doesn't mean they represent what other millennials want
Jeanine-people do move here, typically they have lots more money than the poor folks who currently live here, myself included. los altos was not my first house purchase-it took decades for me to afford this town. there is no free lunch
Sandy: The parking can go underground and many of the housing units will be studios and one bedrooms so one slab of asphalt per unit is sufficient
Are we considering a lot of this development in the downtown triangle? Increasing density there, where it is close to downtown services and transit - and not backing up against residences - seems a win for the town meeting our RHNA numbers and the downtown businesses having more customers. Why are we considering the Grant/Fremont and the Magdalena churches, and other areas, which will just contribute to more traffic and disrupt existing neighborhoods?
In the CRS zone, the property next door to our Legion Hall, 347 1st Street is planning a 5 story building. (corner of 1st and Whitney). I don't understand how the housing element suggests 3 stories. Is this a reduction from current zoning?
El Rancho Shopping Center needs to be preserve
Or turned into BCS new campus
State and Main are the heart of what is Los Altos the village. Any intensified unit capacity should be at the perimeter not in the core
Loyola Corners near my house is severely in need of a makeover.
When you talk about removing caps, then developers get to add another story beyond the 3 stories if they have enough BMR without any approval, so are you including those 4 stories in your estimates, or just the new 3 story limit you are proposing
Loyola Corners, near my house, needs to be updated, and three or four stories with first floor retail would be great
The Rancho shopping center and downtown will remain, just small parts of them will have people living there.
Where will the new schools for all of these new residents be located?

LOS ALTOS HOUSING ELEMENT

Jon, yes, the very wealthy millennials can move here. But we need a middle class and we need to house workers. It's the right thing to do by climate action. We need to think of urban planning and a wholistic view. Not to protect fiefdoms.
So as she is saying it’s capacity not proposed developments
The "candidate parcels" are not correct. Those owners cannot sell they are locked in with the buildings to the left and right on a parking sharing agreement. Not happening.
Yes!!! Anne. What a great development that would be
Thank you pbressack. I should have stated that I meant the downtown periphery, not the triangle.
The city is not going to develop the parking plazas and should not pretend they will
No height increase please, stop trying to destroy Los Alto’s charm, these tall building are ruining it and making it look like a ugly mess.
I do not agree that 4 stories in Loyola Corners would be good. We just went through all this for the Special plan in 2017. Our current 2 stories will automatically become 3 stories with BMRs
These maps are not that helpful. Just feedback, not meant to be critical.
We have to put the housing somewhere. We need to allow for 1958 homes. Where do you propose they go?
Another tactic that needs to change: these patchwork upzones are counterproductive. The city must establish large-scale upzones. For example, make the San Antonio proposed area a large mixed use zone, not parcel by parcel. All of downtown should be zoned for mixed use.
Three stories is not what most people want in Loyola corners. We are not Palo Alto.
Agree Jeanine
Calling this ‘conservative’ is, well, something
What happens to the stores like Luckys that are developed? Do we order from Amazon for groceries?
From Pat: Do you realize that we can't tell much of anything from those zoning maps? We can't see what's there now, can't see the street names. Meaningless -- and yet you want feedback.
well those who live off of San Antonio respectfully disagree-it is our backyard and sideyard. if you want more housing, put it in your backyard, not mine.
Potential for 2100 Woods Lane must address ongoing violation of environmental regulations, and threats to neighborhoods because of flood control basin located there.
We just keep the village characteristics in Los Altos. That’s why we chose to purchase a house

LOS ALTOS HOUSING ELEMENT

and live here. We have been living here over 28 years
All of our grocery stores should be on first floors with housing above. Imagine how wonderful that'd be. Community, no driving, instant customer bases.
the current proposal for 2100 Woods Lane (it's up on the city website) is laughable and will never, ever be approved by the city
Figures
Agree Jeanine.
Happy Mardi Gras everyone!
Why are we focusing only on existing residential zones? Why not convert commercial zones to mixed use?
I would like to understand the specifics on how 501 very-low income units will be built. What are the specified rental/purchase rates for very-low income units? Which identified developers might build these and where?
There was talk of converting OA to residential, which we should definitely do
We just respect the current real estate price fir our current residents. It's not fair to build condo units to bring down our real estate prices.
When I bought my home here in 1989, the city looked quite different. So many of your homes weren't here. Your homes in which many of you live were the result of larger lot buys and subdivisions. I hold no ill will against all the beneficiaries of this increased density. Virtually EVERY single house in Los Altos is the result of subdivision.
Yes, thank you Jill, for asking that.
and your point Jeanine is that we should look like San Francisco, the Bronx or Mumbai?
wow, Jon,
The point is that subdividing lots is our heritage
A little hyperbole, for sure, but things must change.
Wow? What a stretch. How is sub-diving lots a heritage? Maybe when parcels were huge it made sense to sub-divide but now we are down to a 1/4 acre. Anything smaller is like SF.
It'd be nice if more people can share feedback. This was billed as a community feedback workshop. I worry that it's unwise to take 1-2 inputs on a topic & run w/that as though it reflects a broad base of input or consensus of opinion. Perhaps the breakouts need a little more time & fewer questions so we can discuss them in more depth.
Can we get the complete Chats for all the Breakout Rooms?

LOS ALTOS HOUSING ELEMENT

Loyola Corner there many single dwelling houses and this is not something that we approve of any 3 story building.
Thank you Stefano for your excellent moderation.
Loyola Corners would be great with retail businesses on the first floor, housing on 2 stories above, and a park-like area between the new development and the residential area.
Yes, Joe!
We used to have a limit on single family housing stories--depending on the character of the community. If no other 2 story houses in area, you could not develop a 2 story house there. How things have changed!
Love the forward looking ideas Joe!
Joe-to do so requires a mass that doesn't work for the neighborhood and is underparked. it was proposed several y ears ago
No 3 storeys in Loyola corner pls. We live on Miramonte Ave. Parking and privacy are concerns. Your consideration will be greatly appreciated
One speaker wasn't sure Loyola Corners had residential units. It indeed does have lots of residential units. As previously mentioned by sev'l participants, it is an area busy w/pedestrian, bike, & auto traffic. Parking is already challenging there. Raising the height limit is not appropriate given the negative impacts it would have to the existing neighborhoods.
single story R! overlays still exist, Carol. But the irony is that many owners who moved in after the overlay was instituted don't like the restriction.
@Jon I respectfully disagree. Those buildings should be condemned and replaced. Lots of buffer area available in the back parking lot.
Most that live in Loyola Corners do not want anything over 30 ft.
We want to see the “uncharted Chat”. Please provide it in its raw form. Thanks
Joe-look at the proposal that was made and figure out how to address the legitimate issues, which were non trivial
@Nancy the housing has to go somewhere. Where do you propose?
I just met someone this week who lives in Loyola Corners and wants to build R-3 where their house is now.
minimum parcel size can be reduced, R-3 can be allowed everywhere. construction doesn't happen overnight, and this is how you get "gentle density"
@Joe, I would be happy to give you my choices. Fell free to contact me.

LOS ALTOS HOUSING ELEMENT

Grant and Fremont, northeast corner, would be better served by a park, dog park, and transition for bicyclists to get them away from the commuter Fremont/Grant road traffic. It ties into that recently improved Fremont Avenue with bike lane and beautiful trees.
Forgot to ask if there are any school sties on the list? We might be able to add in parking lots
@nancy you should put them here so the public can se your ideas. Why withhold?
I live near Loyola Corners and go there frequently. Would love to have more options for shopping
I wonder if all of the toxic waste from the gas station in that area was removed.
It'd be nice if more people can share feedback. This was billed as a community feedback workshop. I worry that it's unwise to take 1-2 inputs on a topic & run w/that as though it reflects a broad base of input or consensus of opinion. Perhaps the breakouts need a little more time & fewer questions so we can discuss them in more depth. Folks need to see whose raising their hand & trying to share in feedback. Please don't screen that off in future mtgs.
we can see who raises their hands.
I'd be interesting to hear from young people who don't own yet.
Thank you City Staff: Laura and Sonia; Thank you Lisa Wise Consulting and Thank you Plan-to-Place.
I think the city has a responsibility to proactively reach out to those who will be most affected by the proposed changed zoning. they should have a say as well
@Elizabeth M: the breakouts where good, but a bit scripted. Not clear they addressed what people were most concerned about.
Of course! I'm in favor of flag lots and two story townhomes that match the home heights and more.
There is great interest from the two younger generations and from workers in rental solutions.
There should be an in person community workshops where we use scaled lego blocks to place housing on large map tables. Not joking.
Yes, thank you for this session and the quality. Important work.
I'm in my early 30s and an fortunate enough to own, but all my friends who don't yet are moving away.
great interest from younger generation and workers, but the solution should not be at the expense of disadvantaging those who live here
we need these people to live here.

LOS ALTOS HOUSING ELEMENT

BREAKOUT ROOM CHAT COMMENTS

ROOM 1 CHAT COMMENTS
I agree with both Abby and Elizabeth that height on El Camino, if too high, will block light and definitely need a buffer zone to the nearby single story houses.
I heard, secondhand, that Biden said the country needs 3.8 million new homes. CA is demanding 3.5 million new homes. So, CA requirements seem way out of line if these figures are true.
The Fremont and Grant parcel should not have high density development. It would be completely out of character with that whole area, and we need more parks
Grant fremont parcel—how many units and where would they park?
That is such a busy corner with lots of bikes and pedestrians and we just redid Fremont there. Having a lot of residents going in and out at Grant and Fremont would be very problematic
Good point MJ. I agree with both of your points about not having high density & the need for more parks. Additionally, due to the adjacent residential areas height increases would be problematic to the established neighborhoods there. It is a very busy part of town in terms of pedestrian, bikes, & auto use.
From Pat: Do people understand that no one would force the churches to build houses on their property? It would just change the zoning and IF a church wanted to build housing, it could.
From Pat: 12 units on 1/2 acre? Would it be six stories tall? Have you actually seen this corner? (reference to Grant and Fremont)
There are so many kids walking and biking to and from schools there, along Grant and Fremont, it would be very dangerous
are we going to cover the South Area? Specific 2100 Woods Lane?
From Pat: In order to meet the RHNA numbers, the charm and character of every city in CA is going to change. Check out SB9 and SSB10 and SB35 and all the other laws coming from Sacramento.
I think this area would be a good place for more development, since everyone loves to be near downtown, so a higher development here would be good. Not tall but more than single family.
I would like to point out that Rancho already is a two story building, but it is such a good design, that it is not obvious. This is not just a “strip Mall” or the site of a grocery store. There are dozens of businesses and services, some of which are essential, that are all located in one

place. It is a central location that is used by thousands of people on both sides of the expressway. It serves as a community center that is used by residents of all ages, including the school age children who often congregate their after school. Many of my neighbors walk and/or bike to Rancho. We live about a mile away, and my husband bikes there every day. Sometimes he walks, if we are having the car repaired by Jerry, who is an excellent mechanic at the Rancho service station. He can drop off the car, walk home—then walk back when the car is ready. Everyone I know uses Rancho extensively, both for essential and non-essential purposes.
From pat: You're not controlling the conversation, Jen. You're letting people ramble. And it's not really clear exactly what you want. Are you asking if this is a good location? Are you asking how high buildings should be? Or what density? From pat: Just asking for "reactions" lets people ramble.
We are very concerned about setbacks, which make huge difference when buildings start to get higher. And if 3 stories is the new limit, as others have said, the developers will get to build 4 by including a BMR or two.
From Pat: Re Loyola Corners. We already have a 3-story building (with CA Density Bonus) in play. Yes, I would change the density to allow more housing.
Did I miss the part on wood's lane?
Loyola Corner there many single dwelling houses and this is not something that we approve of any 3 story building.

ROOM 2 CHAT COMMENTS
Agreed with Roberta. LWC should disclose excel sheets and shapefiles to get better community input on the site inventory.
I support all the proposals for higher density.
I'm in favor of higher density
of course you do salim, because you don't personally get disadvantaged by a big building in your backyard.
This area of El Camino is already more built up, so the cost of replacement is high and therefore redevelopment is unlikely. It's great to zone for higher density, but doing that in larger areas with less already built will be more effective.
I actually support it, too, for many reasons. We have tiny cottages in our neighborhood that are wonderful, but couldn't even be replaced at the same density if they needed to be rebuilt. Our

LOS ALTOS HOUSING ELEMENT

zoning is unreasonably inflexible and doesn't even reflect actuality.
there is an amazing willingness to destroy the backyard and neighborhood of others. just because you don't live in the ct zone doesn't give you license to advocate for bulldozing neighborhoods and replacing those single family homes with tall multifamily buildings
Agree that more development should take place along El Camino rather than taking away what open areas we have.
Why aren't you looking at more church parking lots?
Alice Shyu: 1) Questions - parking and traffic will be more congested. Any solution?
2) real estate prices - will high density condos bring down our current residents' real estate investment?
3) sharing. (Less than half acre lot. 0.476 acre). Our own house remodeling. We need to bring down our front entrance design to blend into our neighborhood landscaping. Please don't have double standard and bring in high density condos in very residential area. Thank you for listening.
Corner of Grant and Fremont used to be a gas station. How high will the building be?
Fremont Avenue was gridlocked pre COVID times--where will extra cars go ? I agree with Cindy P.
Has the city considered capping building heights to 2 story on Main St. or possibly protecting that small street as a historic district. The rest of downtown can go 4+ stories.
South San Antonio Rd is a bad place to target for housing. It already has parking problems. It abuts single l family homes and no land buffer is proposed.
South San Antonio road has lots that aren't deep and directly impact on single family backyards and side yards. the oa zone should not allow housing. keep the downtown, downtown.
The general plan already permits residential uses in OA
San Antonio as a transit route is another great reason to put housing there.
Where on Fremont ave is there OA?
It's worth reminding that if planning doesn't plan for the requisite homes, state law will bypass local planning entirely.
san Antonio isn't a transit route. there is one bus that has infrequent service. Jill, suggest you get your facts right

LOS ALTOS HOUSING ELEMENT

viable ideas-housing in the parking plazas as long as the parking gets replaced viable ideas-redevelop homestead plaza
I am well aware of that Jon, but it will change. Your tone is inappropriate and rude
It'd be great if we knew how all of these numbers were calculated.
Why Homestead Plaza? There is little parking there as is. What happens to the stores there?
I agree Salim. Why these particular numbers? The State has taken too much control over local zoning laws. ^^
Why doesn't the city protect the old, potentially historic buildings on Main St?
well there seem to be a willingness to get rid of retail and services, so that is a big site. I think where we are heading is insane. it is furthermore insane since we have to meet numbers without the inevitable density bonuses that always occur
When my husband lived in Switzerland there was a butcher shop a block away in the middle of his neighborhood. It was wonderful.
The state is taking it away a little tiny bit at a time because municipalities aren't allowing houses to get built
the debate isn't about multifamily housing-its is about 50 and 60 foot buildings, which is the inevitable result of allowing housing in most of these area
I'm in favor of multi-story high residential on top of the City parking lots, so they are more interior, behind the storefronts. However, I'm against high density along Main or First because the city allows building next to sidewalk because of mixed use, and density bonus. It destroys the pedestrian level view when you allow buildings right up to the sidewalk even if they throw in a few BMR.
And even the kindergartners walk alone to school. They closed the downtown Friday to sunday night to cars and made it pedestrian and bus only. Such a nice, safe, vibrant way of life.
Cindy, I agree with the unpleasant walk along 1st. The city needs to implement a sidewalk policy with a tree strip and landscape buffer.
No overdevelopment of Loyola Corners.
I am against destroying the things that make our downtown along main and state streets charming and inviting. 50 and 60 foot buildings fit that categoyr
No overdevelopment of Loyola Corners.

LOS ALTOS HOUSING ELEMENT

Parking along curb side is dangerous especially at night. Not enough parking. Miramonte Ave could not be expanded.
the consensus is everyone (myself included) wants develop to occur somewhere, as long as it isn't in their neighborhood.
3 storeys buildings? 3rd floor residents can see through the windows in their neighborhood. We need privacy. Thank you for your consideration
the old math was 3 stories was 30 feet, now 3 stories can be 45 feet before bonuses and waivers which bring total height to 65 feet. we are being hoodwinked
I agree with Debbie Skelton. I'm particularly concerned about the intersection and bridge over the expressway. Lots of traffic/ped/bike conflicts now.
why not blanket R-3?
you can build one house on an r-3 if you want
no actually you cannot
Citizens don't really have control over the State law
Loyola Corner there many single dwelling houses and this is not something that we approve of any 3 story building.

ROOM 3 CHAT COMMENTS
The el Camino corridor is much more able to support high density buildings. Still lacks adequate public transport, etc. Much better than cramming ADU's in residential neighborhoods.
There are a number of city-owned lots that are not on the current site list. Just in my neighborhood, there is the bordered up coffee stop in Loyola Corners, the vacant lot on the corner of Green Oak Lane and Bendigo Dr, and the vacant lot at the SW Corner of Grant and Fremont (kitty corner from the site that is on the site map.
Since these are all owned by the city right now, there is no reason these should not be used for housing now.
Across the street Density is 60-90DU/AC Los Altos is at 38 DU/AC
Using the 30% of income for Very Low Income level, that would mean: $2K/month rent for a family of 4

LOS ALTOS HOUSING ELEMENT

Agree with Freddie, have to choose carefully on el Camino to consider existing single family homes
Whoops: sent too fast. Family of 4 would require $2K rents/month. For family of 2, it would be $1.7K monthly rents. I would like to understand which identified developer will build these units with presumably these deed-restricted rents?
I don't think that Rancho Shopping Center will be developed for anything because I don't think the owner wants to build, but it's one parcel, and if a developer (market or affordable) built it, they'd build the entire lot
Barry, the developer who builds those units is any developer in Los Altos, because they are required to build 15% or more affordable units in every project
Has anyone done a traffic study on El Camino? I feel like it is going to be gridlock when all the proposed housing units are finished. We all want the high density housing away from us but it was already gridlock at 5:00 PM before Covid. I agree with you Cindy. That open space is lovely.
More housing (especially within walking distance of services) lowers traffic because people don't need to drive to work, grocery, etc
Curious about SB9 and if homeowners/developers might build 4 units on a SF lot. How do we forecast the new housing unit potential here?
Those churches are across the street from a grocery store! Rancho is right there.
Thanks Anne, where is it mandated that a developer must build 15% very low income units? Didn't know this existed.
I agree with David. Is there an overall urban planning document to put the proposed sites in context?
Downtown is the place that needs "vibrancy" in order to support shops and restaurants. Consider putting 4 story housing units all over downtown and build 3 or more parking garages at least two on what was the parking plazas
Barry, it's called "inclusionary zoning" and most cities around here that are not named Los Altos Hills have it. The actual details vary, but nobody's building a 20 unit project in Los Altos, Mountain View or Palo Alto without building some affordable homes
Developers must provide 15% affordable units on each condominium project and pay $55-60K/unit on park fees traffic impact fees plus school fees EST $2-3/SF per SF of building or something like that

LOS ALTOS HOUSING ELEMENT

I agree, no zoning on OA
3 stories, but what max height?
35 ft max in downtown
3 stories 35 ft
Mircea, can you build 3 stories with lower one retail in 35 feet? Barely?
Not when you add in density bonuses
11 ft commercial /1st 8ft-1-2-3 so with commercial is hard. they will need about 38 ft to make it decent.
@Mircea: is that 15% referring to SB35 projects, or all projects. Does Los Altos require this 15% for all projects?
15% BMR on all developments - Outside any SB35
@Anne, @Mircea, how many very low income units have been built in Los Altos in the past few years?
Mircea: plus elevator shaft,... 😬 I seen too many Developments which tend to end up as 10' per floor plus 10-15' extra
Besides parking, how is school capacity planning being taking into account?
They allow elevator shaft additional height up to 8ft on top of the roof
@Mircea. Thanks. But presumably all developments then utilize SB35 in order to gain projects benefits? Are there non-SB35 projects that provide 15%BMR units?
On a 3 story building the elevator profile is not that bad
I agree with KirkM. Thanks
Rancho Shopping Center needs preservation as it is historically significant and serves a large spectrum of the community 3 miles from the downtown. A large repertoire of needs are met for the community surrounding it. It is "vibrant" and is "utilized" extensively. Many citizens walk and bike to it. Take a look at the myriad of services to get an idea of what I am saying. The redwood tree is huge, as are the white oaks. It is park-like and unique.
All non-SB35 projects must provide 15% BMR
For question 5, yes absolutely allow 3 stories at Loyola Corners. That property is underutilized.
I agree that Rancho is special and those services essential. Is there a way to build mixed-use on that site with new housing and still keep those services? I like to hope so.

LOS ALTOS HOUSING ELEMENT

I'm in favor of putting housing on parking plazas, but we shouldn't put the parking plazas on the housing element site inventory unless the city has a plan, with deadlines and commitments, and puts that plan in the housing element where it will be legally binding
No to three stories. No, 2 stories only in Loyola corners
@tom Why 2 stories vs. 3 in Loyola Corners? Imagine 3 stories at Loyola Corners with a park like area between the development and the R1 housing
Agree on Loyola corners, way under utilized and old, hasn't changed in 25 years
@Mircea, the Los Altos number is 501 for very low income units. Are you or some other developer likely to build these?
The problem is if we allow the more then two stories, the developers can ask for bonuses and it will end up a huge buildings with no set backs. Two story duplexes would be fine
Many of the San Antonio offices have homes right behind the site. Local residents are concerned about parking and traffic in Hillview neighborhood.
Loyola Corners is not a commercial zone, it's commercial neighborhood, for good reason. Look at specific plan - it was created with a great deal of thought and consideration. It's not downtown
@Anne, are you asking for legally binding commitments for all of the housing element?
I'm saying that if the city tries to put parking plazas on the site inventory, but does not make a commitment in the housing element to actually develop the parcels, then the state will reject the housing element and make the city take those sites off the housing element. Like they did with Santa Monica
You've got to consider the creek and impact on building right on the creek for the old bank site. Plus people have single family homes on the other side of creek, so a large building would have BIG impact
If the city puts programs to develop the parking plazas in the housing element, it IS legally binding
@Mircea, I am interpreting your comments correctly. There is no 15% requirement unless developers use SB35, and that provides developers the ability to exceed local zoning requirements.

ROOM 4 CHAT COMMENTS

LOS ALTOS HOUSING ELEMENT

"I think the diocese of San Jose is looking at what they can do with their lands. Saint Nicholas and Saint Williams and Saint Simons in LA"
"Up zoning in this area is completely appropriate, El Camino commercial thoroughfare should be dense especially since it is near transit and services Not sure they are looking at all those sites but those are the sites
Opposition to density and increase to height limits but not in opposition to more housing on the whole
"The church on Grant Rd. between Fremont and Foothill might be one to consider as well."
"To Teresa's point can we caveat the heights to be max after density bonus just to clarify for people"
What is the highest building on El Camino?
"I'm going to guess 5 stories"
"And Mountain View is at 5 including rooftop I think"
"Oh except the one large apartment and office across from Jordan"
"How short are we from the mandated number?" 500 short
"Thanks. What is the downside of showing properties like B of A as potential sites even if B of A says it is not interested?"
"The downside is that the state rejects the siting...bad."
"Thanks. What happens if the state rejects the siting? What makes this bad?"
"Upzoning along El Camino thoroughfare is a good idea, the residents will be near stores, services and public transportation, and close to downtown Mountain View, will be quite convenient location for residents (and probably also for business)"
"In order for the Housing Element to be accepted by HCD, the sites listed as able to be developed must be feasible. There must be evidence that the parcel can be developed."
"Get your friends to look at it" I'm guessing the church isn't planning on closing. Just making room for housing
"Michael, back to the topic of what happens when the state rejects our HE: at first, warnings, then fines, then bigger fines, then we lose our local control (they give developers the permission to come in and build without our input), and then the state comes in and, at the extreme, can put our city into receivership to tell us where we will build housing and what density it will be.They could even put halts on requests for private owners to revise their property pending the consideration of whether or not housing can be put there. It is imperative we make a feasible Housing Element and keep things under our control."

LOS ALTOS HOUSING ELEMENT

"Michael, we also lose state funding...oh he's dealing with this"
"All cities adopt housing elements. We want to be a city that has one"
"Are you familiar with the situation at 40 Main?"
"Schools are not full
"our schools are not full"
"when you create demand for schools, schools happen. same goes for transit."
"The schools come at great cost to our community"
"Why aren't apartments family oriented? Lots of families live in apartments"
"Agree merchants benefit it we add housing downtown"
"I agree with Julie! Our privilege has allowed many of us to characterize family life unreasonably elite. I admit sometimes I even have to check myself on this. The merchants (existing and future) in South los altos would be thrilled with more customers. Safeway/Andronicos is barely hanging on.
Fremont/Grant would be a nice site for a 4- or 6 plex. The conifers along the periphery would make it invisible to adjacent neighbors.
I do not think that the Fremont/Grant site is perfect, but at this stage in the housing crisis, I don't think we have the luxury of finding perfect. There is a bus route that goes right past that corner, and it would be easy to have an entrance on Fremont and an exit on Grant. A vacant lot with a few townhomes houses people
I like thinking about organic growth in ADUs and sprinkling a 4 or 6-plex where we can. It's more work to plan the sites throughout the city but also more welcoming than placing it all at El Camino
The presentation shows something like 30 to 40 units per acre so that 0.5 acre site would likely have 15 to 20 units as I read the documents.
Agree with Julie as well. A 4 or 6-plex is much more palatable to areas with family homes than a bulky apartment building
Most of the El Camino residential units are condos, not rentals. Only Colonnade is rentals and is owned by Stanford.
I also like taking 1-acre lots in the R1 area (upzone to R2) and creating cute little 2/1 bungalow courts like in the old days. These are great for starter families. I'd rather have a bungalow court next to me than a 2 story mcmansion (no disrespect to my neighbors where I live!).
Ooh sounds nice. I'll move in Jeanine. Would be nice to have places to downsize for this largely over 60 crowd

LOS ALTOS HOUSING ELEMENT

Great suggestion by Jeanine Valadez, creative and very appealing
The orchard site is historical and has limitations because it was donated to city (or sold?) with limitations that it must remain an orchard.
I love walking through the Dos Pueblos neighborhood. Small lots, gorgeous cute new and old small homes, great community.
the orchard at the civic center has an historic designation
The proposal it so build 30 to 40 units per acre not low density like "2/1 bungalow courts like in the old days"
Great suggestion, Jeanine. Could be great for older folks who are downsizing (count me in when I'm 75!)
we should protect the orchard; I believe in locational history. I have a vestigial appie in my backyard.
Generally, I hope the new housing re-uses parking lots, instead cutting down trees. The corner at Grant/Fremont seems to be a nice piece of land for trees to make the area green
Agree with dongzheng on making best use of parking lots and NOT giving up greenspace wherever we can avoid it.
Support upzoning to allow mixed use everywhere.
Absolutely upzone OA to mixed use.
Absolutely support the upzoning of parcels in the 'administrative' area (the purple area) which you just mentioned.
Yes, OA should allow residential
In fact those offices on Altos Oaks used to be housing in the old days.
Check out Midpen housing at 2510 Soquel Ave. in Santa Cruz. It is very low profile but has a good number of units.
I'd like to see an emphasis of getting the affordable as a priority

LOS ALTOS HOUSING ELEMENT

City Council Meeting

Format: Zoom Virtual Meeting | March 22, 2022, 7:00 pm

The purpose of the City Council's March 22, 2022 Housing Element Update agenda item was to provide a brief overview of the Housing Element Update process, describe the sites inventory analysis methodology and preliminary findings, and to receive direction from the City Council regarding potential zoning modification options to address an anticipated shortfall in Regional Housing Needs Allocation (RHNA) capacity.

The City Council Meeting was held via Zoom at 7:00 pm and was facilitated by City staff and the consultant team (Lisa Wise Consulting, Inc.). The meeting agenda, staff report, and PowerPoint presentation were made available online prior to the meeting. Approximately 40 members of the public attended the meeting. The presentation for this agenda item is outlined below:

1. Housing Element Overview
2. Sites Inventory Analysis
3. Community Feedback
4. Next Steps

ATTENDANCE

Meeting participants: approximately 40 attendees

City Staff

- Gabriel Engeland – *City Manager*
- Jon Maginot – *Assistant City Manager*
- Laura Simpson – *Interim Planning Director*

Consultant Team

- **Lisa Wise Consulting, Inc.** – David Bergman, Jennifer Murillo, Stefano Richichi

MEETING SUMMARY

Laura Simpson opened the meeting and introduced the team. Jennifer Murillo from Lisa Wise Consulting, Inc. gave a presentation that included a brief overview of the Housing Element and process, but focused primarily on approach, methodology, and assumptions for the sites inventory analysis. Jennifer then described various policy considerations for preliminary zoning modification options. The following questions were posed in the presentation:

1. Allow higher density in the Commercial Thoroughfare (CT) District?
2. Allow residential on certain Public and Community Facilities (PCF)-Zoned Parcels?
3. Allow residential in the Office Administrative (OA) District?
4. Establish a minimum density and allow 3 stories (or 100% residential uses) in the Commercial Retail Sales (CRS) District?
5. Remove the density cap and allow 3 stories (or 100% residential uses) in the Loyola Corners Specific Plan?

LOS ALTOS HOUSING ELEMENT

Preliminary sites maps were presented, noting that community feedback has been and continues to be received and will inform revisions to the preliminary sites maps.

Following the presentation, City Councilmembers asked questions and requested additional information regarding the methodology used for identification of preliminary sites. No further direction was provided.

Comments from members of the public are summarized below:

- If density isn't modified in the R-1 districts, changes will have to made in other zoning districts.
- Being identified as a preliminary site does not mean that an existing building on the property will be torn down or that the existing use will be removed.
- Requests for additional information and a detailed list of preliminary sites.
- Concern that Rancho Shopping Center, Lucky's, State Street Market, City parking spaces, Packard Foundation garden, and St. Nicholas's parking lot are not going to redevelop as housing.
- The OA District has narrow lots and shouldn't be rezoned to allow residential.
- Concern about allowing residential in the OA District and insufficient parking.
- The outreach strategy should include banners, sandwich boards, etc.
- Support for the need to upzone. The Housing Element should be a plan to build more housing, not just a plan to please HCD. We're not telling businesses to go away; office and retail can coexist with housing.
- Some zoning modifications should be implemented. This could be through wholesale changes to zoning or overlays to promote redevelopment of certain properties.
- Concern about limited access and safety/evacuation issues regarding the 2100 Woods Lane site.

LOS ALTOS HOUSING ELEMENT

Planning Commission Meeting

Format: Zoom Virtual Meeting | July 7, 2022, 7:00 pm

The purpose of the Planning Commission's July 7, 2022, Housing Element Update agenda item was to present the Public Review Draft Housing Element Update and provide an opportunity for Planning Commission discussion and public comments.

The Planning Commission Meeting was held via Zoom at 7:00 pm and was facilitated by City staff and the consultant team (Lisa Wise Consulting, Inc.). The meeting agenda and staff report were made available online prior to the meeting, and the PowerPoint presentation was made available online the following day. Approximately 30 members of the public attended the meeting. The presentation for this agenda item is outlined below:

1. Housing Element Overview and Outreach
2. Sites Inventory
3. Goals, Policies, and Programs
4. Process & Next Steps
5. Questions and Comments

ATTENDANCE

Meeting participants: approximately 40 attendees

City Staff

- Nick Zornes – *Development Services Director*
- Jolie Houston – *City Attorney*

Consultant Team

- **Lisa Wise Consulting, Inc.** – David Bergman, Stefano Richichi
- **Plan to Place** – Rachael Sharkland

MEETING SUMMARY

Chair Shelley Doran opened the meeting and Director Nick Zornes introduced the team and goals of the meeting. David Bergman and Stefano Richichi from Lisa Wise Consulting, Inc. gave a presentation that included a brief overview of the Housing Element, but focused primarily on community outreach, the methodology and results of the sites inventory analysis (including a discussion of the sites inventory maps), and the various goals and programs proposed in the draft Housing Element. The team emphasized that community feedback has been and continues to be solicited and received and will continue to inform the Housing Element Update.

Following the presentation, Planning Commissioners asked questions regarding the rezoning process in relation to the site inventory analysis, the proposed sites inventory buffer, the potential impact to commercial areas, the role of SB 9, next steps in the process, and whether property owner consent is needed for inclusion of a property as an identified site. A Planning Commissioner expressed support for a downtown parking garage in the CRS District.

LOS ALTOS HOUSING ELEMENT

Comments from members of the public are summarized below:

- Support for the proposed draft Housing Element.
- Belief that the Housing Element fulfills the City's RHNA obligation.
- Concern about allowing residential use in the OA District, citing narrow configuration of lots, potential height increases, and insufficient parking.
- Concern on the impact of new residential developments to existing residents and commercial centers.
- Support for townhomes.
- Support for Programs 1.B and 1-H, to allow more housing along El Camino Real and to develop housing on City-owned parking lots in Downtown, respectively.
- Suggestion for the OA District to include a housing overlay to more strictly regulate development standards.
- Concern that the maps incorrectly show the Village Court area identified to be rezoned, and a request to specifically analyze Rilma Lane.
- Support for further analysis to find parking solutions downtown.
- Requests for additional information on how the sites were chosen.
- Requests for the outreach strategy to engage a greater number of residents.
- Support for inclusion of additional church parking lots in the sites inventory.
- Requests that community outreach further include low-income workers and support these community members, such as by increasing forms of public transportation.

LOS ALTOS HOUSING ELEMENT

City Council Meeting

Format: Zoom Virtual Meeting | July 12, 2022 at 7:00 pm

The purpose of the City Council's July 12, 2022 Housing Element Update agenda item was to discuss the Public Review Draft Housing Element Update, provide an opportunity for City Council and public comments, and obtain City Council direction to submit the Draft Housing Element Update to the California Department of Housing and Community Development (HCD) following the completion of the 30-day public comment period and 10 business days to consider and incorporate public comments.

The City Council Meeting was held via Zoom at 7:00 pm and was facilitated by City staff and the consultant team (Lisa Wise Consulting, Inc.). The meeting agenda and staff report were made available online prior to the meeting, and the PowerPoint presentation was made available online the following day. Approximately 35 members of the public attended the meeting. The presentation for this agenda item is outlined below:

1. Housing Element Overview and Outreach
2. Sites Inventory
3. Goals, Policies, and Programs
4. Process & Next Steps
5. Questions and Comments

ATTENDANCE

Meeting participants: approximately 50 attendees

City Staff

- Nick Zornes – *Development Services Director*
- Gabriel Engeland – *City Manager*
- Jolie Houston – *City Attorney*

Consultant Team

- **Lisa Wise Consulting, Inc.** – David Bergman, Jennifer Murillo, Stefano Richichi

MEETING SUMMARY

Director Nick Zornes introduced Jennifer Murillo, David Bergman, and Stefano Richichi from Lisa Wise Consulting, Inc. (LWC) to present the Housing Element draft update. LWC gave a presentation that included a brief overview of the Housing Element, but focused primarily on community outreach, the methodology and results of the sites inventory analysis (including a discussion of the sites inventory maps), and the various goals and programs proposed in the Draft Housing Element.

LOS ALTOS HOUSING ELEMENT

Following the presentation, the public provided comments and City Councilmembers presented their questions and comments.

Comments from members of the public are summarized below:

- Modify Program 3.A (Downtown parking plan and update parking requirements) to require a secure bike room and bike valet for new multi-family developments.
- Support for the proposed Draft Housing Element.
- Opposition to Planning Commission being delegated authority to approve housing projects since the Planning Commission is not elected.
- Support for Planning Commission authority to approve housing projects based on expertise; otherwise Planning Commission's authority is undercut and application processing delays result.
- Support for low-income housing to be distributed throughout the city.
- Proposal that height be limited to 30 feet in the OA District.
- Proposal for low-income housing at vacant lots near to public transportation.
- Support for affordable housing development because it will add income and ethnic diversity to the city.
- Support for the proposed Draft Housing Element, and understanding that HCD's certification is required for a legally compliant Housing Element.
- Comment that the City should do more to address underutilized homes; opposition to short-term rentals.
- Support for strict regulation of housing to promote orderly development; comment that this has made Los Altos is a high resource area.
- Concern that the Draft Housing Element does not address the needs of the community or safeguard the existing quality of life.
- Both opposition to and support for the City's current story pole requirement.
- Disappointment in the grocery stores being included as sites.

Comments from the City Councilmembers are summarized below:

- Although there is more work to be done, the Draft Housing Element is excellent and tailored to the needs of the community.
- The Design Review Commission is a constraint.
- The Housing Element should mention housing consultants generally (i.e., not Alta Housing specifically).
- Reporting on page C-24 does not accurately reflect net new units built; this should be corrected.
- Other technical errors in the Draft Housing Element should be corrected.

LOS ALTOS HOUSING ELEMENT

The City Council voted unanimously (5-0) to make factual corrections and minor edits to the Draft Housing Element and submit the revised Draft Housing Element to HCD.

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Appendix F: Affirmatively Furthering Fair Housing (AFFH)

Contents

Section F.1 Introduction

Assembly Bill 686, signed in 2018, establishes a statewide framework to affirmatively further fair housing (AFFH) with the goal of achieving better economic and health outcomes for all Californians through equitable housing policies. AB 686 defined "affirmatively furthering fair housing" to mean "taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity" for persons of color, persons with disabilities, and other protected classes. AB 686 requires cities and counties to take deliberate actions to foster inclusive communities, advance fair and equal housing choice, and address racial and economic disparities through local policies and programs. Housing elements are now required to address the following five components:

- **Inclusive and Equitable Outreach:** A summary of fair housing outreach and capacity that includes all economic segments of the community.
- **Assessment of Fair Housing:** An assessment of fair housing issues, including integration and segregation patterns, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs for all identified populations.
- **Analysis of Sites Inventory:** An evaluation of whether the Housing Element's sites inventory improves or exacerbates conditions for fair housing.
- **Identification of Contributing Factors:** The identification and prioritization of contributing factors related to fair housing issue.
- **Priorities, Goals, and Actions to AFFH:** The identification of fair housing goals and actions that directly address the contributing factors outlined above. The housing element should include metrics and milestones for evaluating progress and fair housing results.

This section documents four of the five components of the AFFH components. The summary of AFFH-related outreach is included in Housing Element Section I.E (Summary of Public Participation).

F.1.1 Notes on Figures and Analysis

This Appendix contains geospatial data downloaded from HCD's AFFH Data and Mapping Resources Hub. Additional analysis is sourced from the Census American Community Survey and HCD's pre-certified data, where appropriate.

Section F.2 Assessment of Fair Housing

F.2.1 History of Fair Housing Issues

Los Altos occupies land that was inhabited by the indigenous Ohlone people. According to the City of Los Altos Historic Context statement[1], evidence of their presence on the land has been confirmed by the discovery of human and cultural remains within the City Limits. This population began to be displaced from the territory that includes Los Altos with the establishment of La Purisima Conception Rancho and Rancho San Antonio during the period of Spanish and Mexican occupation. The Los Altos region began to attract significant Euro-American settlement after California's entry into the United Sates in 1850. This population growth was accelerated by the arrival of the railroad into the area in 1864. The region remained primarily agricultural with large land holdings owned by Euro-American landowners. The first urban lots were subdivided in 1906 by the Altos Land Company on what is currently referred to as the Downtown triangle. The remainder of the area of Los Altos was largely agricultural. The large agricultural holdings were generally owned by Euro-American families who would employ ethnic Japanese and Chinese persons as domestic labor.[2]

Census provides insight into the racial and ethnic composition of the Los Altos area in the early 20th century. The census did not record any Black or African Americans in Los Altos until 1920 when three individuals were recorded as being present. The largest non-white population in the area were ethnic Japanese. By 1920 this population comprised 22 percent of the foreign-born population in Los Altos. Much of this population was engaged in agricultural production on leased land due to explicitly racist land ownership laws, ethnic Japanese farmers were not able to own land outright.[3] Discrimination against ethnic Asians was a feature of the land tenure system that effected Los Altos' development. The Chinese exclusion act of 1882, which was not repealed until 1943, formalized discrimination against ethnic Chinse persons and limited their ability to own land in Los Altos; and the internment of Japanese Americans during the Second World War removed many ethnic Japanese families from Los Altos.[4]

The practice of formal exclusion based on race and ethnicity effected the ability of a non-white population to own property in Los Altos until these legal exclusions were invalidated by the federal Fair Housing Act (also known as Title VIII of the Civil Rights Act of 1968). At the State level, the California Fair Employment and Housing Act also provided legal remedies to address housing discrimination on the basis of race and ethnicity. Despite these legal protections, the legacy of

[1] City of Los Altos, Historic Resources Inventory, *Section II Los Altos: Historic Context* April 2011
[2] Ibid p.19
[3] Ibid p. 20
[4] Los Altos Historical Society *Finding Asian America in the Museum* April 15, 2021

racialized control of land in Los Altos can be observed in contemporary patterns of residential composition within Los Altos and the greater region.

F.2.2 Fair Housing Outreach and Enforcement

Fair housing complaints can be an indicator of housing discrimination in contemporary Los Altos. Fair housing issues can arise through discrimination against an individual based on disability, race, national origin, familial status, disability, religion, or sex when renting or selling a dwelling unit.

The U.S. Department of Housing and Urban Development's (HUD) Office of Fair Housing and Equal Opportunity (FHEO) is the federal agency responsible for eliminating housing discrimination, promote economic opportunity, and achieving diverse, inclusive communities. FHEO services and activities include investigating fair housing complaints, conducting compliance reviews, ensuring civil rights in HUD programs, and managing fair housing grants.

The Office of Supportive Housing provides fair housing services to urban and unincorporated areas of Santa Clara County. They provide information and services on tenants' rights, fair housing, and local tenant protections. The non-profit organization Project Sentinel provides fair housing services to residents of Santa Clara County that include assisting individuals with housing discrimination complaints. From 2004 to 2021, there were nine fair housing cases in Los Altos. These cases related to protected categories as follows: familial status (five cases, 56 percent), disability (two cases, 22 percent), and race (two cases, 22 percent). All cases were counseled and closed; no cases are currently pending in Los Altos.[5]

Comments during the Housing Element Update process identified a need for providing more information about available services to residents, particularly seniors. Housing Element programs are included to promote awareness of available resources, information, and services related to fair housing and affordable housing generally.

The City does not have any pending lawsuits, enforcement actions, judgements, settlements, or findings related to fair housing and civil rights. The City does not currently have any local fair housing laws or programs to specifically address fair housing issues.

The city complies with State and federal housing laws as follows:

- **Fair Housing Act; Title VI of the Civil Rights Act of 1964** – the City complies by ensuring its actions related to housing are not discriminatory through City protocols, decision-making procedures, and adhering to non-discrimination requirements of federal funding programs.

[5] Elizabeth Sanchez, Supervising Fair Housing Coordinator, Project Sentinel, May 2022.

- **Rehabilitation Act of 1973** – see Fair Housing Act; also, the City complies through its accessibility protocols, administered and enforced by the City's ADA/504 Coordinator and Building Official.
- **American Disabilities Act** – the City complies with the ADA through building permit review and issuance and as described in Appendix C (Housing Constraints, Section C.2.2, Housing for Persons with Disabilities).
- **California Fair Employment and Housing Act (FEHA) and FEHA Regulations** – the City complies with FEHA and its regulations through established City protocols for hiring and decision making, mandatory trainings for City staff, and legal counsel and advisement.
- **Government Code Section 65008** – the City ensures that the City's actions are not discriminatory through training programs conducted by the City's Human Resources Department. Programs are included in this Housing Element to facilitate housing for all households, including protected classes (e.g., programs regarding residential care facilities, reasonable accommodation, and emergency shelters).
- **Government Code Section 8899.50** – Appendix F of this Housing Element documents compliance with Affirmatively Furthering Fair Housing requirements.
- **Government Code Section 11135 et. seq.** – the City complies with anti-discrimination requirements through the City's Human Resources programs and the City's procurement protocols.
- **Density Bonus Law (Government Code Section 65915)** – the City must update its density bonus provisions in compliance with the Density Bonus Law as described in Appendix C (Housing Constraints) and Program 3.E.
- **Housing Accountability Act (Government Code Section 65589.5)** – the City has documented compliance with the HAA as described in Appendix C (Housing Constraints).
- **No-Net-Loss Law (Government Code Section 65863)** – the City has documented compliance with sufficient capacity for RHNA and will ensure compliance with no-net-loss via programs (Program 1.J).
- **Least Cost Zoning Law (Government Code Section 65913.1)** – the City includes programs in this Housing Element to ensure that sufficient land is zoned with appropriate standards to accommodate its RHNA.
- **Excessive subdivision standards (Government Code Section 65913.2)** – the City's subdivision standards are typical or not excessive in compliance with the Government Code (see Appendix C, Section C.2.5).
- **Limits on growth control (Government Code Section 65302.8)** – the City complies as it has no growth control measures.

- **Housing Element Law (Government Code Section 65583)** – this Housing Element documents compliance with Housing Element Law.

F.2.3 Integration and Segregation

This section analyzes integration and segregation, including patterns and trends, related to people with protected characteristics.

Race and Ethnicity

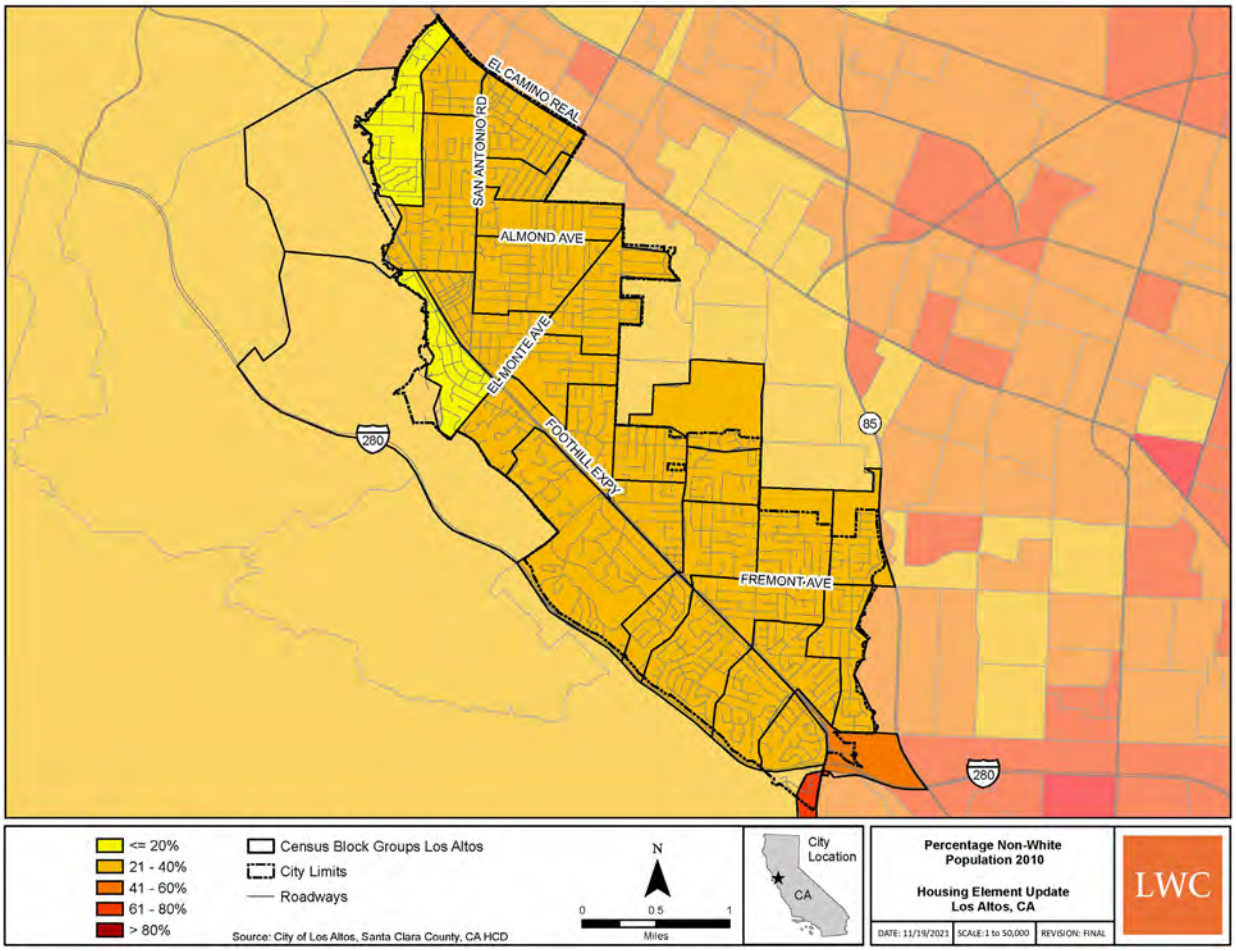
According to the American Community Survey (ACS), Los Altos had a lower proportion of racial and ethnic groups than Santa Clara County in 2019. Approximately 38.4 percent of the Los Altos population belonged to a racial minority group compared to 55.5 percent of the county population at that time. The largest minority group was Asian in both the city and county at 31.4 percent and 36.5 percent, respectively. Residents identifying as Hispanic or Latino was 4.4 percent in the city and 25.5 percent in the county.

Figure F-1 provides historical non-white population percentages by block group based on 2010 ACS data. At this time, the northern portion of the city had the lowest non-white percentages with less than 20 percent in two northern block groups. Most of the city had non-white percentages in the 21 to 40 percent range. In 2010, two block groups in the southern portion of the city had non-white percentages above 40 percent.

Figure F-2 shows the non-white population percentage by census block group for 2018. Most block groups in the city had a non-white population in the range of 21 to 40 percent at that time. Ten block groups had non-white population percentages in the next highest category with most of them located in the southern portion of the city.

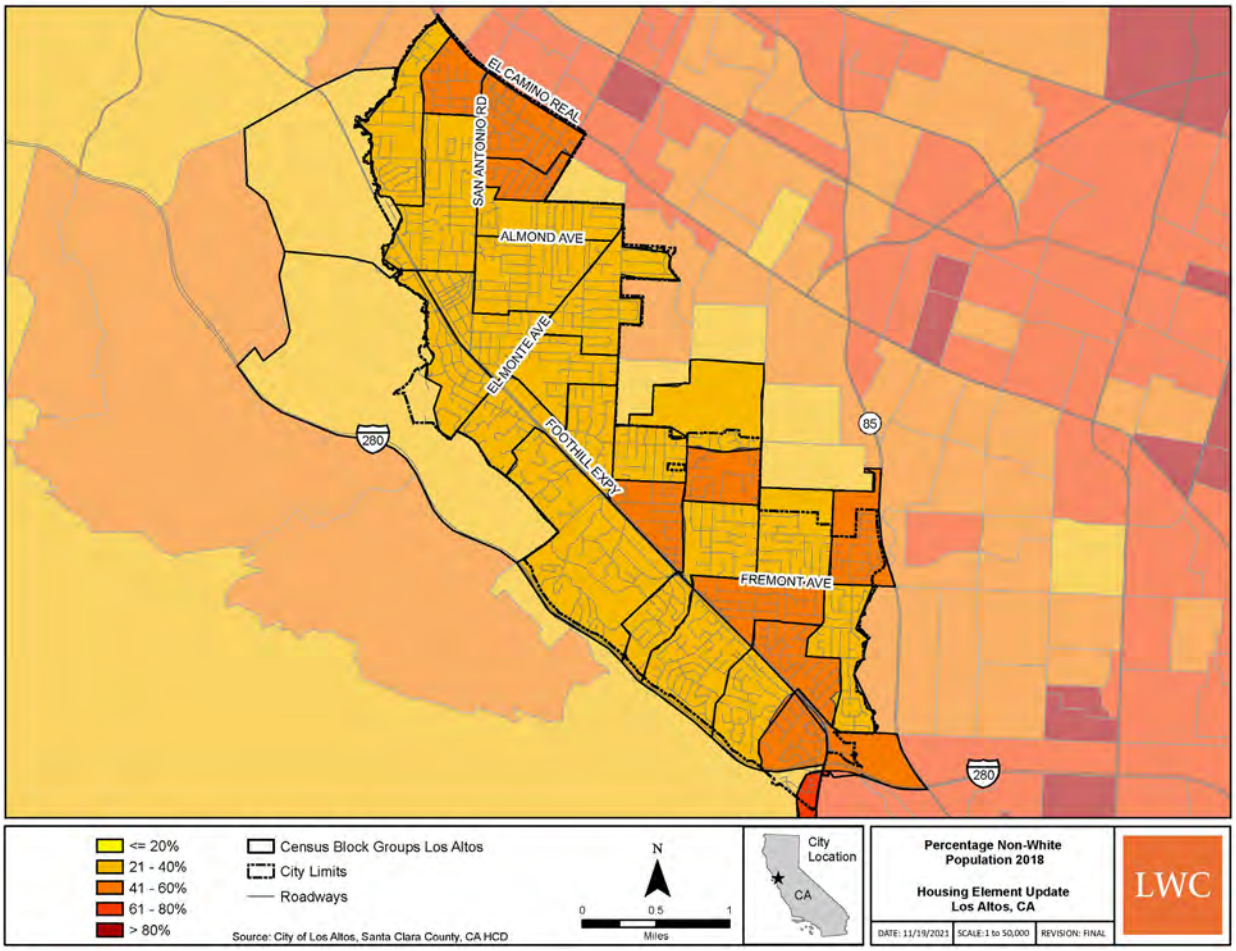
The city had higher percentages of non-white population overall in 2018 as compared to 2010 according to ACS data. The 2018 ACS data showed an increase in non-white population percentage in most block groups in the city compared to 2010 data. The southern portion of the city bordered by Interstate 280 contained the highest non-white percentages in both periods. Non-white population percentages are generally higher outside of the city to the north, east, and south.

Figure F-1: Non-White Population (2010)



Source: HCD AFFH Spatial Data

Figure F-2: Non-White Population (2018)



Source: HCD AFFH Spatial Data

Disability

People are considered to have a disability if they have one or more of the following: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.

Figure F-3 presents the ACS 2010 to 2014 data for percentage of population with a disability and Figure F-4 shows the ACS 2015 to 2019 data for percentage of population with a disability.

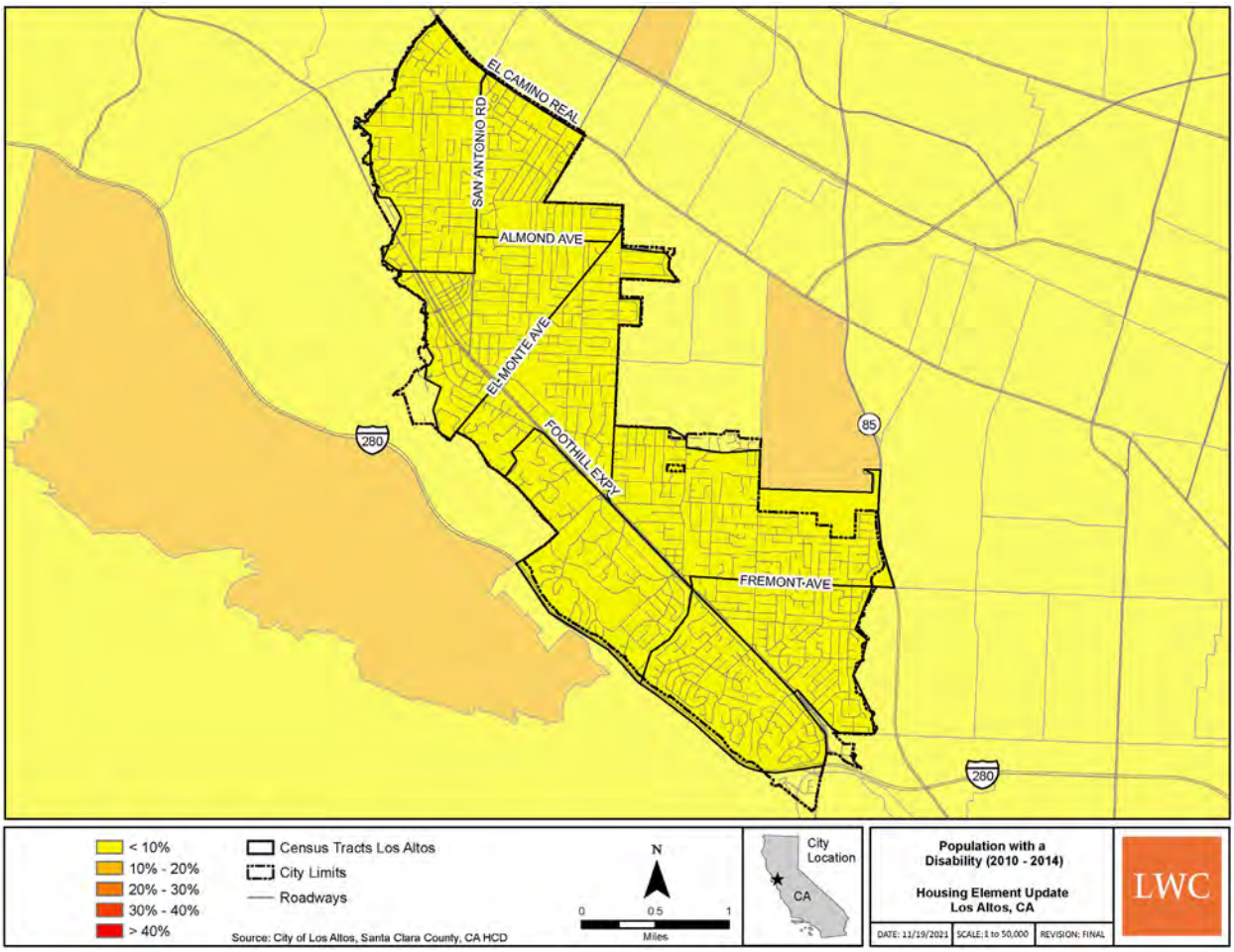
According to 2015 to 2019 ACS data, approximately 5.7 percent of Los Altos residents have a disability, compared to 8.0 percent countywide (Table F-1). All census tracts in Los Altos consisted of less than 10 percent of residents experiencing disability during both five-year time periods except for the southernmost tract that extends beyond City limits. Surrounding areas exhibit similar disability levels in the 2019 data with most adjacent census tracts in the same quintile range as the city. Two tracts adjacent to the north and southwest of the city have disability population estimates in the next highest range of 10 to 20 percent (Figure F-4).

Although Los Altos has a lower proportion of population with a disability compared to the county, comments during the Housing Element update process reflected the desire to prioritize housing that serves young families, low-income households, seniors, and those with disabilities.

Table F-1: Percentage of Population with a Disability (2019)

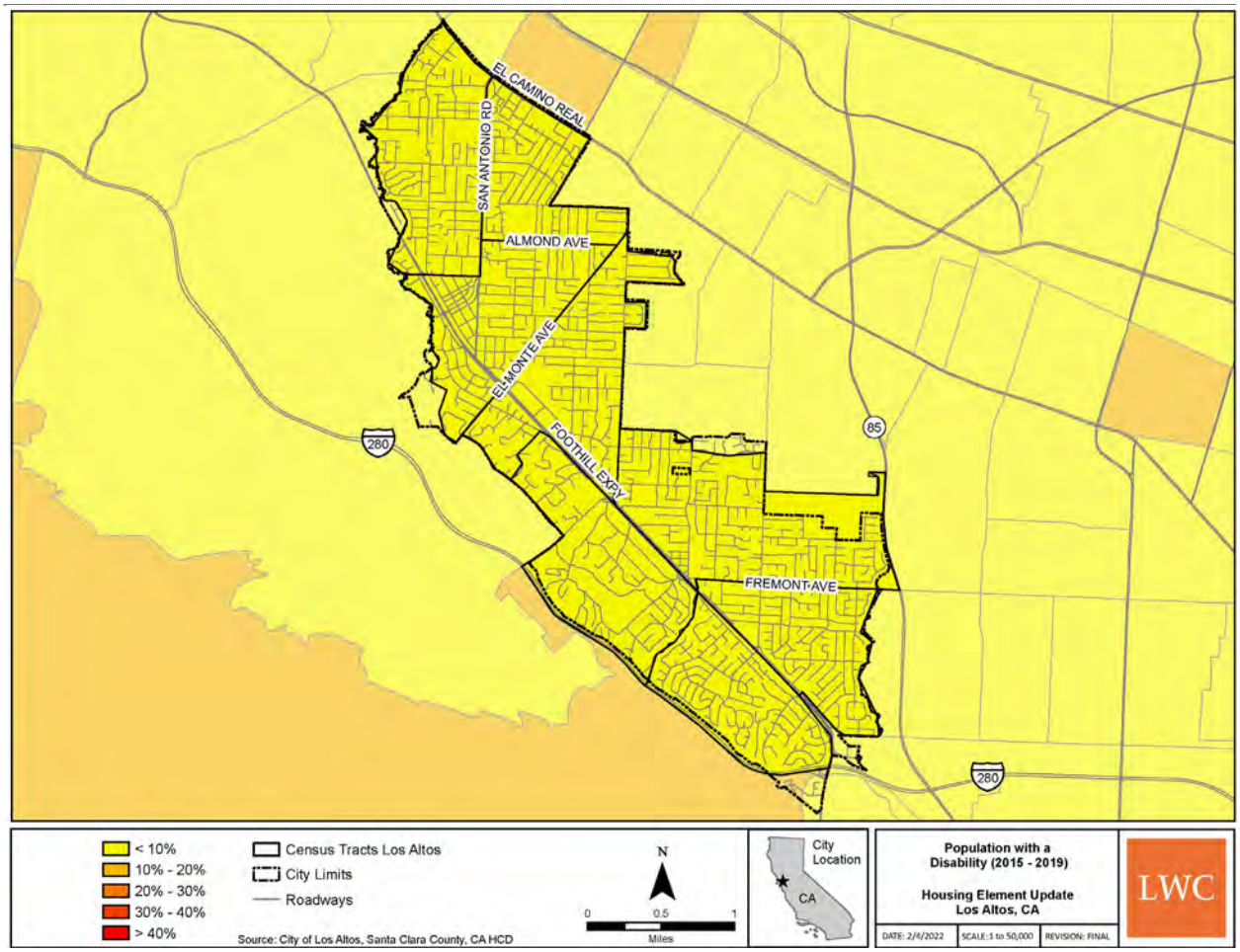
Los Altos		Santa Clara County
Number	**Percentage**	**Percentage**
1,739	5.7%	8.0%
Source: ACS 2019 5-Year Estimates, Table S1810		

Figure F-3: Percent of Population with a Disability (2010 - 2014)



Source: HCD AFFH Spatial Data

Figure F-4: Percent of Population with a Disability (2015 - 2019)



Source: HCD AFFH Spatial Data

In Los Altos, there are differences in disability status by race and ethnicity. White individuals are far more likely to have disabilities than Black individuals, with the incidence of disabilities among the larger Asian and Hispanic populations in between. It is likely that the very small number of Black residents and disparities in age (which is highly correlated with disability status) between White, Asian, and Hispanic residents explains much of the disparity. The median age of Hispanic residents of Los Altos is 36.6, while the median age for White residents of Los Altos is 50.1.

Table F-2: Disability Status by Race and Ethnicity (2019)

Race or Ethnicity	Total Population	Number with a Disability	% with a Disability
White Alone, Not Hispanic or Latino	17,543	1,284	7.3%
Black or African American Alone	129	0	0.0%
Asian Alone	9,562	342	3.6%
Hispanic or Latino (of any race)	1,341	60	4.5%
Source: Lawyer's Committee, Baird + Driskell Community Planning; ACS 2019 5-Year Estimates			

Input during the Housing Element process included that housing stock should accommodate the ageing population and prioritize people with disabilities, as well as young families and low-income households.

Familial Status

Familial status protection covers households in which one or more minor children live with: a parent, a person who has legal custody (including guardianship) of a minor child or children, or the designee of a parent or legal custodian, with the written permission of the parent or legal custodian. Examples of familial status discrimination include refusal to rent to families with children, eviction of families once a child joins, and confinement of families to specific floors of a building.

According to 2019 ACS data, 39.4 percent of all households in Los Altos have one or more children under the age of 18, which is about a two percent increase from the 2010 estimate (37.3 percent). The city's share of all households with children is higher than that of the county overall at 36.3 percent and the Bay Area region at 32 percent. It is also higher than the surrounding neighboring jurisdictions of Palo Alto (34.0 percent), Mountain View (27.4 percent), and Sunnyvale (33.9 percent). The rate for married couple households with their own children in the city is 34.8 percent compared to 27.0 percent in the county and 22.3 percent in the Bay Area according to ACS 2019 data (Table F-3).

Figure F-5 shows the percentages of children in married couple households in Los Altos by quintile. The percentage of children living in married couple households is uniformly high across the city, exceeding 80 percent in all tracts. Most census tracts adjacent to these areas also have high levels at over 80 percent. As noted in Section F.2.2, most fair housing complaints in Los Altos have been related to familial status. Furthermore, comments during the Housing Element process identified that the availability of housing for young families is a critical issue.

Single-parent households are also a fair housing protected class. Los Altos has 2.2 percent of households consisting of single-parent households according to the ACS data. Female-headed households are more likely to experience greater housing affordability challenges due to typically lower household incomes compared to two-parent households. ACS data indicates that 1.9

percent of households in Los Altos are single female-headed households with children compared to 3.3 percent in the county and 3.7 percent across the Bay Area region (Table F-4).

ACS five-year data for 2015 to 2019 is presented by quintile for the percentages of children in single female-headed households in Los Altos is shown in Figure F-6. This map shows that all census tracts within the city have percentages of children in single female-headed households below 20 percent. Every adjacent tract to the city contains similar levels of these types of households, with the exception of one tract to the north of the city. This tract contains percentages of children in single female-headed households in the next highest quartile at approximately 24.8 percent.

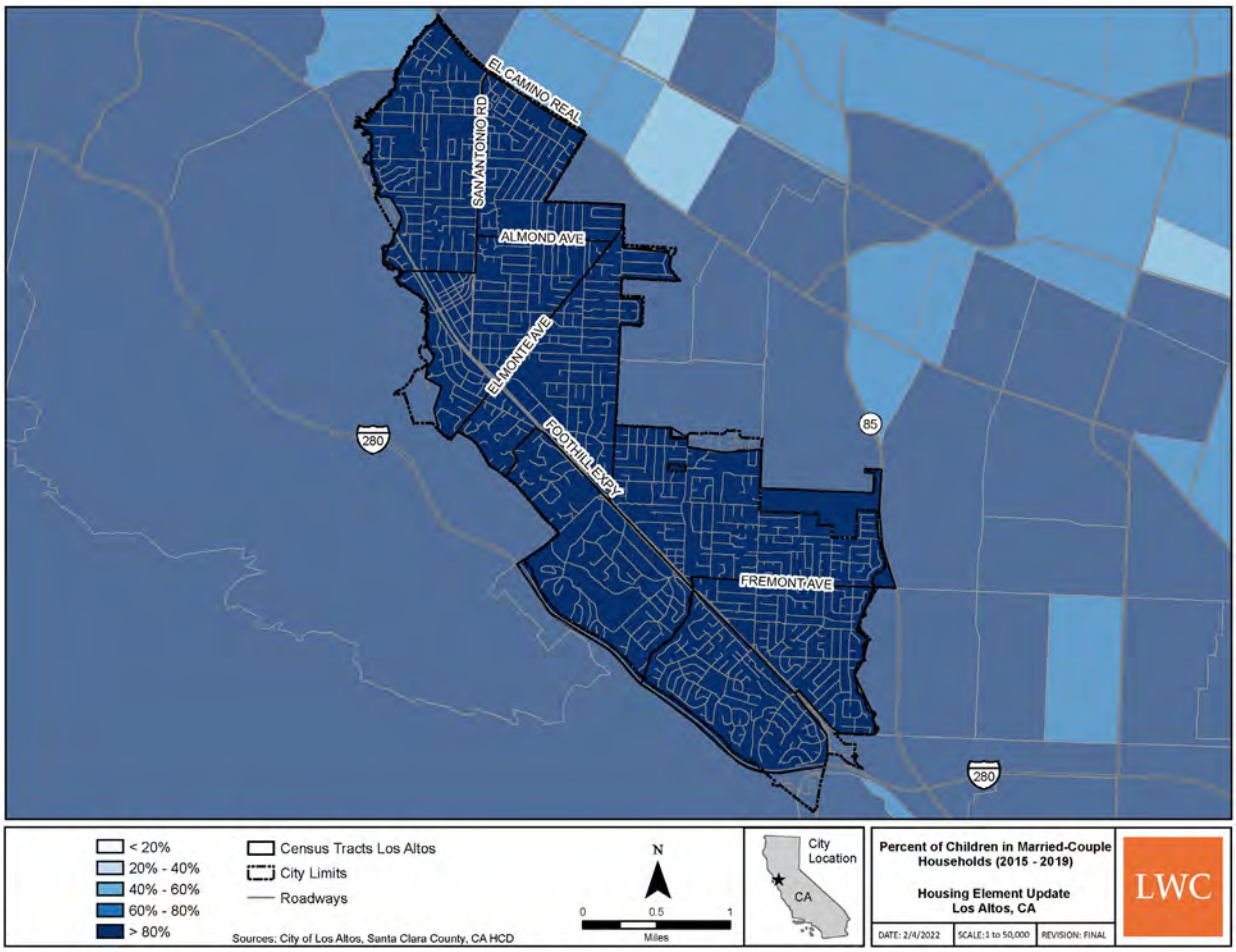
Table F-3: Percentage of Married-Couple Households with Children (2019)

Los Altos	Santa Clara County	Bay Area
34.8%	27.0%	22.3%
Source: ACS 2019 5-Year Estimates, Table DP02		

Table F-4: Percentage of Female-Headed Households with Children, No Spouse/Partner Present (2019)

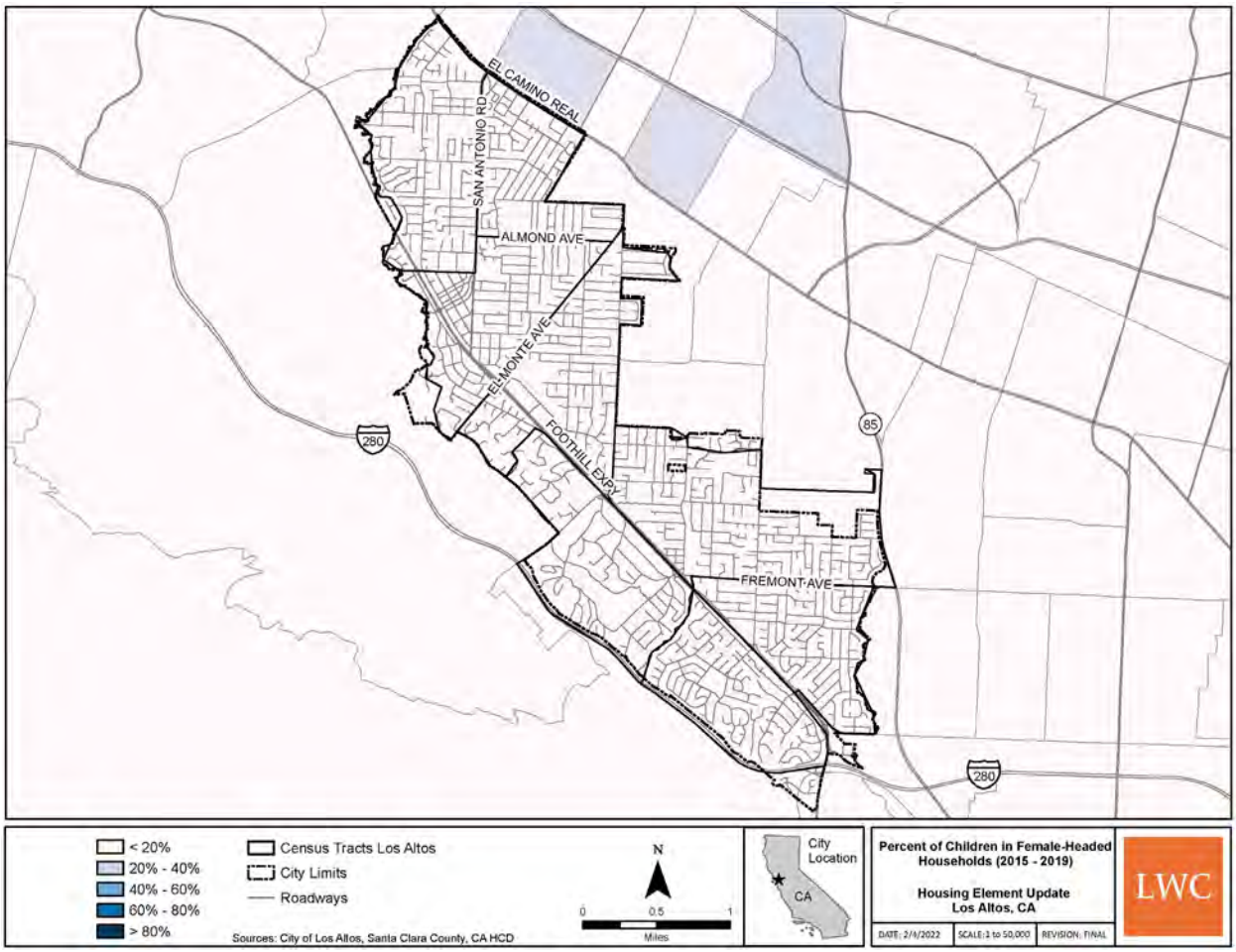
Los Altos	Santa Clara County	Bay Area
1.9%	3.3%	3.7%
Source: ACS 2019 5-Year Estimates, Table DP02		

Figure F-5: Children in Married-Couple Households (2015 - 2019)



Source: HCD AFFH Spatial Data

Figure F-6: Children in Female-Headed Households with No Partner Present (2015-2019)



Source: HCD AFFH Spatial Data

Income

According to the 2015 to 2019 ACS, the median household income in Los Altos was $235,278, which was more than Santa Clara County at $124,055 during the same period (Table F-5).

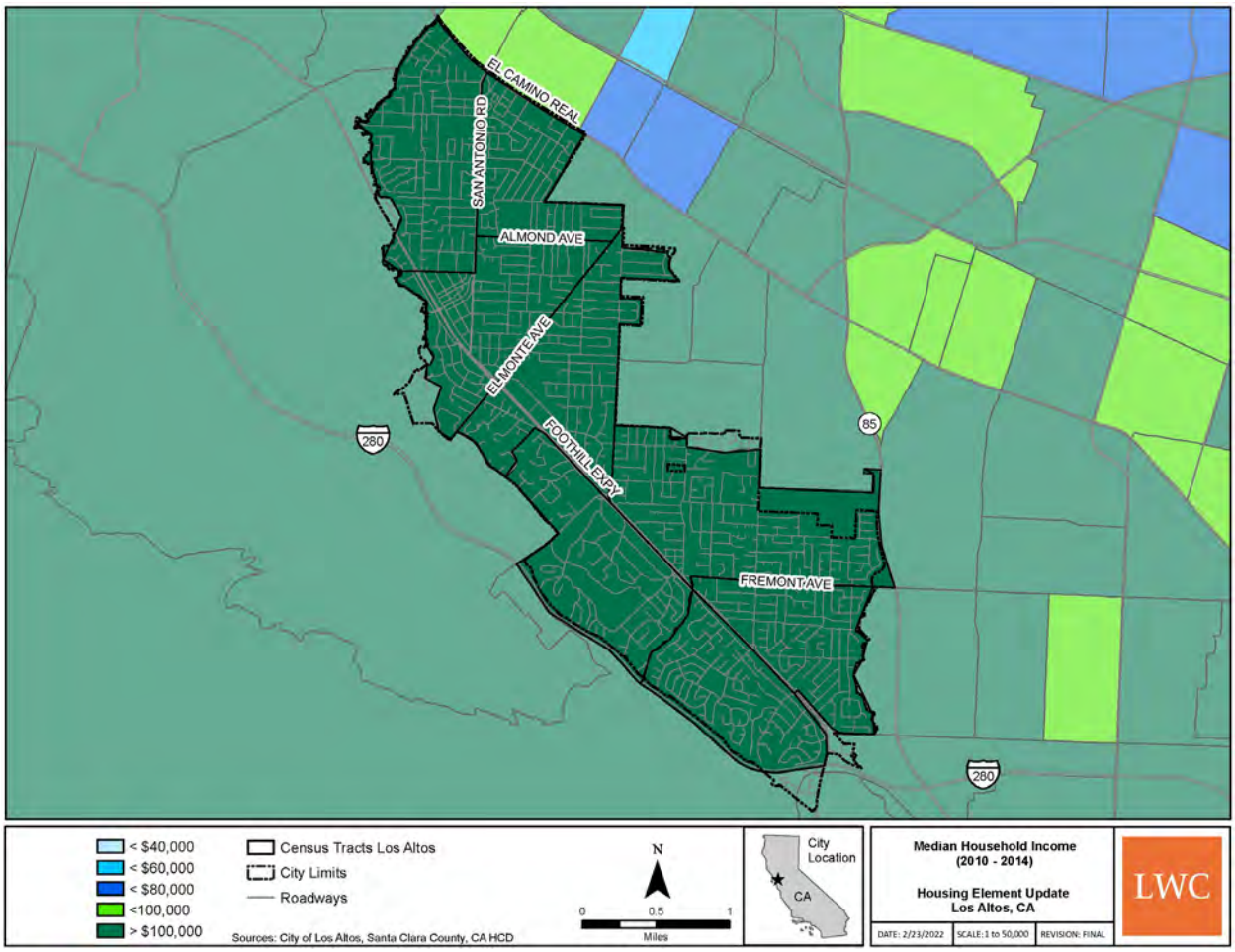
Figure F-7 displays the distribution of median household income by census tract in Los Altos for 2010 to 2014. Household income was approximately uniform across the city during that time period at $100,000 or above. Most tracts adjacent to the city exhibited similar incomes at that time.

Figure F-8 presents median household income by block group for 2015 to 2019. Household incomes in the city remained at similar levels compared to 2010 to 2014 data. Several block groups did not have household income data for that period, so tract level data was used instead as indicated in Figure F-8. Household income was lower in about half of the surrounding block groups outside city in the 2015 to 2019 ACS data compared to the previous period.

Table F-5: Median Household Income (2019)

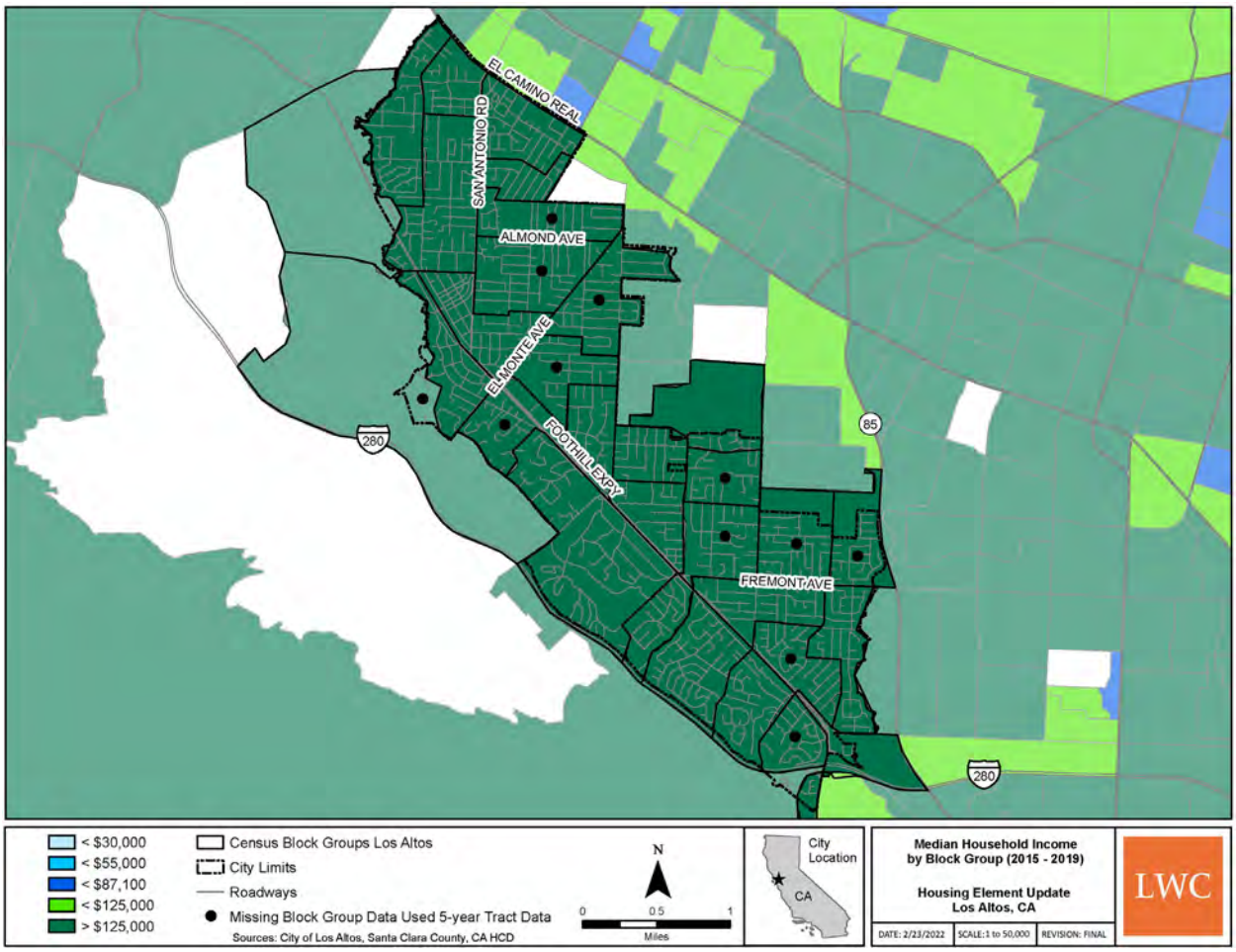
Los Altos	Santa Clara County
$235,278	$124,055
Source: ACS 2019 5-Year Estimates, Table S1901	

Figure F-7: Median Household Income (2010 - 2014)



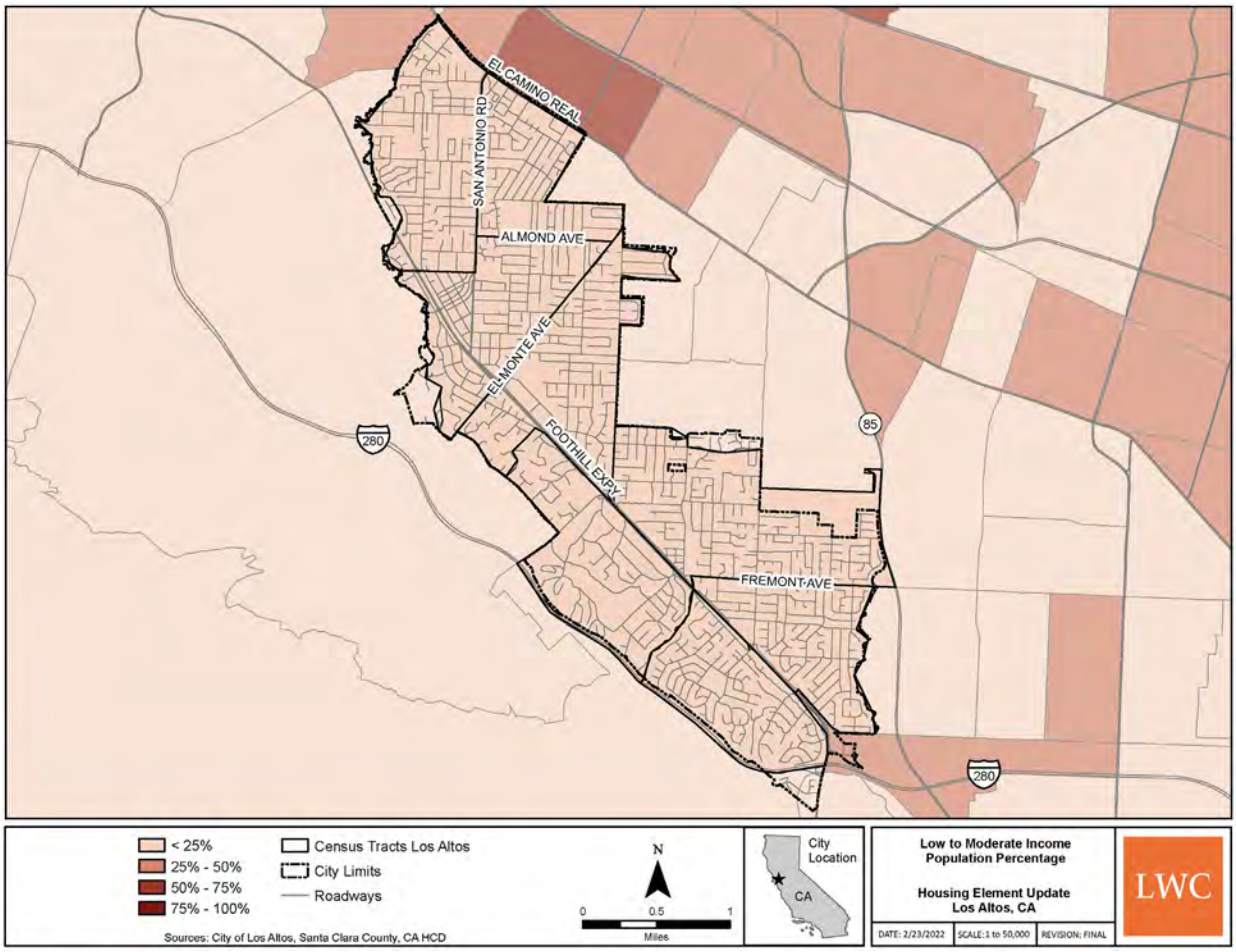
Source: HCD AFFH Spatial Data

Figure F-8: Median Household Income (2015 - 2019)



Source: HCD AFFH Spatial Data

Figure F-9: Low to Moderate Income Population (2015 - 2019)



Source: HCD AFFH Spatial Data

Figure F-9 presents the distribution of LMI households in the city by quartile. The amount of LMI households is low across the city at less than 25 percent. Census tracts adjacent to the city to the north have much higher levels of LMI populations than the city. A tract to the southeast of the city contains a higher LMI population percentage. This follows the observed regional pattern of LMI household percentages generally increasing to the north.

Income can also be disaggregated by race and ethnicity to further understand local patterns of segregation and integration. The citywide poverty rate was 2.8 percent according to 2015 to 2019 ACS data, compared to 7.5% countywide. The rate by race/ethnic group in Los Altos is shown in Table F-6. Residents who identify as two or more races experience poverty at a higher rate than other racial or ethnic groups in the city at about 7.8 percent. The poverty rate for this group is notable because of the number of individuals and that they represented about 5.5 percent of the total population according to the 2019 ACS data. Black and American Indian residents also experience elevated poverty rates relative to their population share (also see Appendix A, Housing Needs Assessment, Section A.3.4, Residents Living Below the Poverty Level).

Table F-6: Persons in Poverty by Race/Ethnicity (2019)

	Number of Persons	Poverty Rate by Race/Ethnicity	% Of Total Population
Below poverty level estimate	856	2.8%	-
White alone	484	2.6%	61.6%
Black or African American alone	7	5.4%	0.5%
American Indian and Alaska Native alone	2	6.5%	0.1%
Asian alone	232	2.4%	31.4%
Native Hawaiian/Other Pacific Islander alone	0	-	0.0%
Some other race alone	2	0.7%	0.9%
Two or more races	129	7.8%	5.5%
Hispanic or Latino origin (of any race)	30	2.2%	4.4%
Source: ACS 2019 5-Year Estimates, Table S1701			

Segregation Report

The AFFH Segregation Report for Los Altos has been prepared by the University of California Merced Urban Policy Lab in cooperation with the Association of Bay Area Governments and the Metropolitan Transportation Commission. The key findings from the report include the observations that both neighborhood racial segregation and income segregation in Los Altos declined since 2010. Another key finding states that "segregation between lower-income residents and residents who are not lower-income has decreased between 2010 and 2015". These findings are consistent with figures provided in this section, and the report is attached to this appendix.

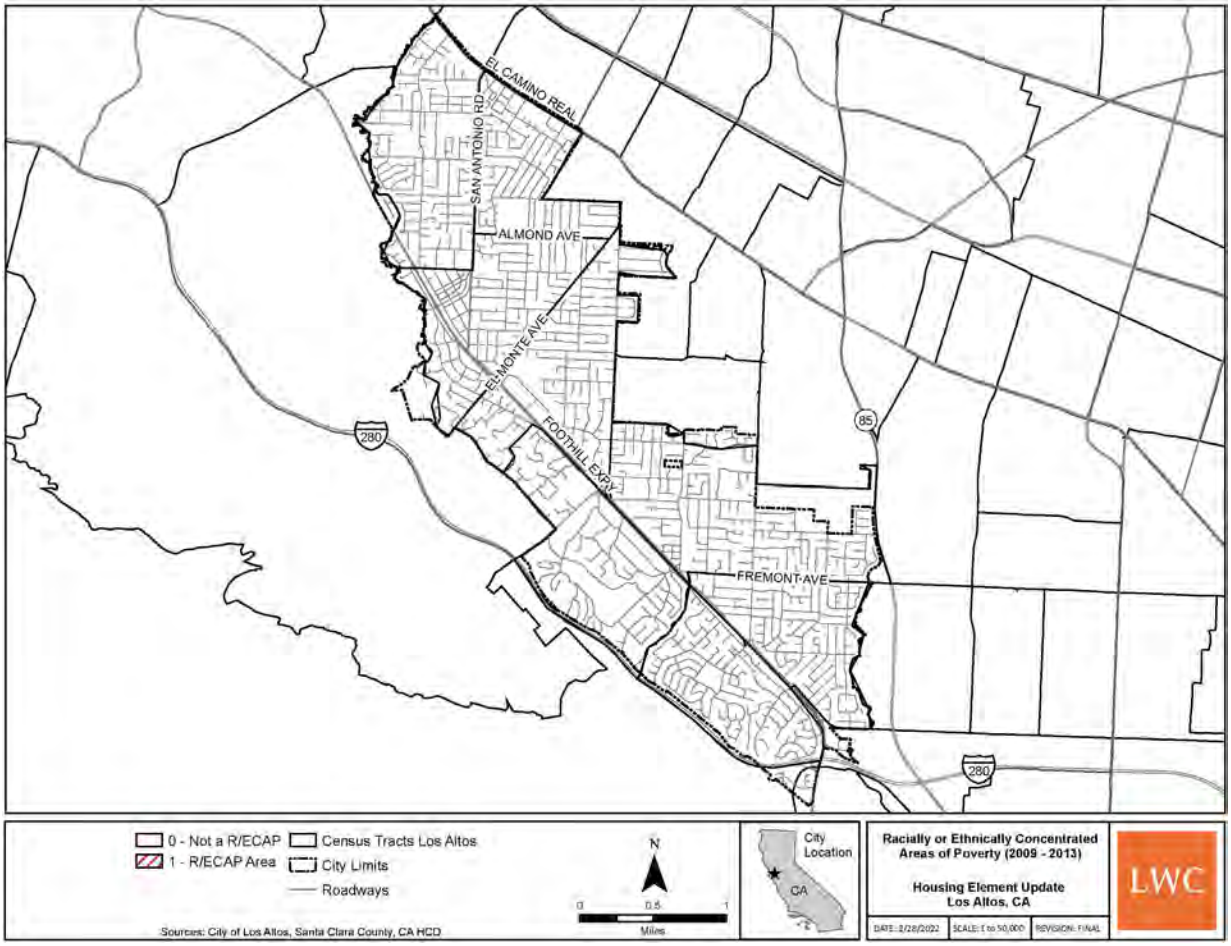
F.2.4 Racially or Ethnically Concentrated Areas of Poverty

Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) are areas that exhibit both high racial/ethnic concentrations and high poverty rates. HUD defines R/ECAPs as census tracts with a majority non-white population (50 percent or more) and a poverty rate that exceeds 40 percent or is three times the average poverty rate for the county, whichever is lower.

R/ECAPs may indicate the presence of disadvantaged households facing housing insecurity and need. They identify areas whose residents may have faced historical discrimination and who continue to experience economic hardship, furthering entrenched inequities in these communities. According to Figure F-10, there are no R/ECAPs in Los Altos or in the surrounding area.

Figure F-10: Racially/Ethnically Concentrated Areas of Poverty (2009-2013)



Source: HCD AFFH Spatial Data

Racially or Ethnically Concentrated Areas of Affluence (RCAAs)

Racially or Ethnically Concentrated Areas of Affluence (RCAAs) are neighborhoods in which there are both high concentrations of non-Hispanic White households and high household income rates. Based on research from the University of Minnesota Humphrey School of Public Affairs, RCAAs are defined as census tracts where 80 percent or more of the population is white, and the median household income is $125,000 or greater (which is slightly more than double the national median household income in 2016).

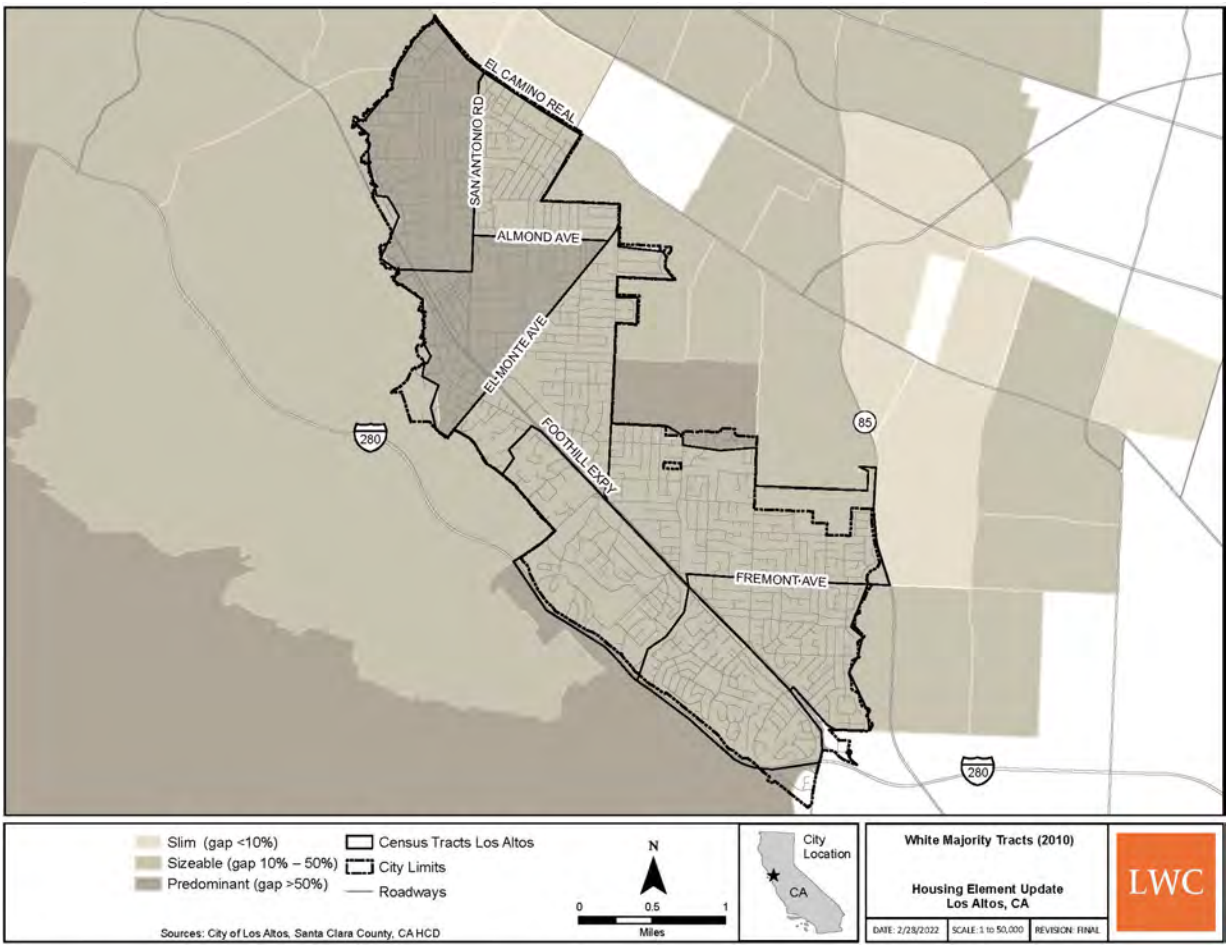
However, HCD adjusted the RCAA methodology to track more closely with California's higher levels of diversity by setting the white population threshold to 50 percent. According to 2010 data available from HCD and provided in Figure F-11, Los Altos had two white-majority census tracts in the Predominant category at about 52 percent each, with the remaining areas between 10 and 50 percent categorized as Sizeable white-majority gap. Those two white-majority tracts have household incomes greater than $125,000 and are therefore RCAAs by the HCD criteria. One of

these RCAA tracts is situated between El Monte Avenue and Almond Avenue and the other RCAA tract is located in the northwestern portion of the city to the west of San Antonio Road.

Since release of the draft Housing Element in June 2022, HCD released new RCAA data that better reflects California's relative diversity and regional conditions and is derived from ACS 2015 - 2019 data. The new data is shown in Figure F-12 for Santa Clara County and indicates that all of Los Altos is a RCAA except for a small portion in the south of the city (e.g., Foothill Crossing Shopping Center).

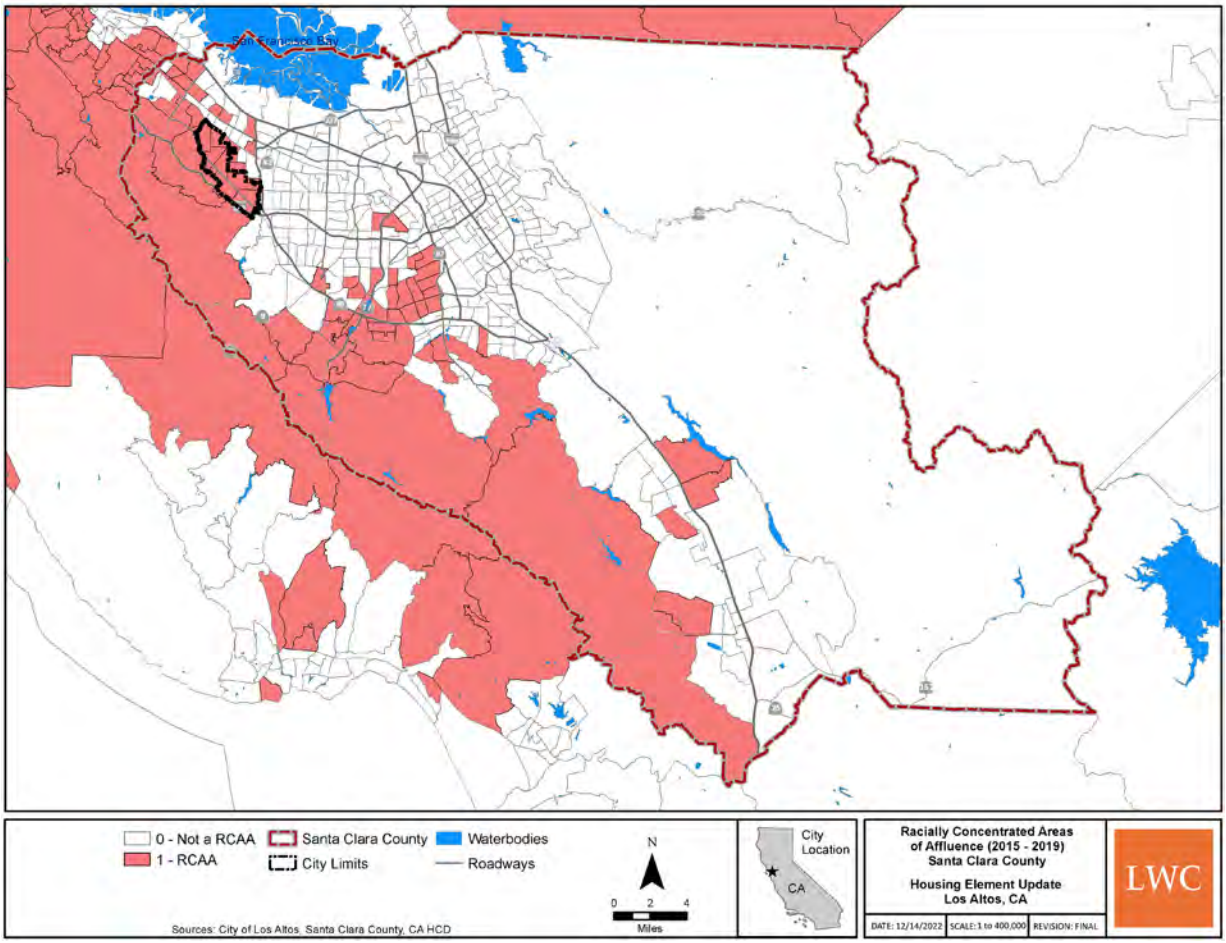
RCAAs within Santa Clara County are mostly concentrated in the western region of the county from the northwest portion to the southwest portion. Los Altos is situated within this regional grouping of RCAAs with Los Altos Hills and unincorporated areas to the west being all RCAAs. Areas to the north, which include Palo Alto and northern portions of the county, are mostly RCAAs. Neighboring areas to the east including Mountain View contain some RCAAs, while the cities of Sunnyvale and Cupertino to the east and southeast do not contain any RCAAs. This regional pattern indicates that the concentration of RCAAs decreases from west to east in the vicinity of Los Altos and across the county and suggests that Los Altos is less inclusive compared to the region.

Figure F-11: White Majority Tracts (2010)



Source: HCD AFFH Spatial Data

Figure F-12: Santa Clara County RCAAs (2015-2019)



Source: HCD AFFH Spatial Data

F.2.5 Access to Opportunity

One important component of fair housing is a neighborhood's access to opportunity, which correlates relative place-based characteristics of an area, such as education, employment, safety, and the environment, with critical life outcomes, such as health, wealth, and life expectancy. Ensuring access to opportunity means both investing in existing low-income and underserved communities, as well as supporting residents' mobility and access to 'high resource' neighborhoods.

In February 2017, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened the California Fair Housing Task Force to provide research and evidence-based policy recommendations to further HCD's fair housing goals of (1) avoiding further segregation and concentration of poverty and (2)

encouraging access to opportunity through land use policy and affordable housing, program design, and implementation.

HCD and TCAC prepared opportunity maps to identify census tracts with the highest and lowest resources. High resource areas are areas with high index scores for a variety of opportunity indicators. Examples of indicators of high resources areas include high employment rates, low poverty rates, proximity to jobs, high educational proficiency, and limited exposure to environmental health hazards**.** High resources tracts are areas that offer low-income residents the best chance of a high quality of life, whether through economic advancement, high educational attainment, or clean environmental health. Census tracts in the city that are categorized as moderate resource areas have access to many of the same resources as the high resource areas but may have fewer job opportunities, lower performing schools, lower median home values, or other factors that lower their indexes across the various economic, educational, and environmental indicators.

Low resources areas are characterized as having fewer opportunities to employment and education, or a lower index for other economic, environmental, and educational indicators. These areas have greater quality of life needs and should be prioritized for future investment to improve opportunities for current and future residents.

The opportunity maps inform TCAC, which oversees the Low-Income Housing Tax Credit (LIHTC) Program, to distribute funding more equitably for affordable housing in areas with the highest opportunity. The analysis evaluates total access to opportunity (e.g., high, moderate, low), but also individually assesses opportunity access across more specific indicators, such as education, transportation, economic development, and environment.

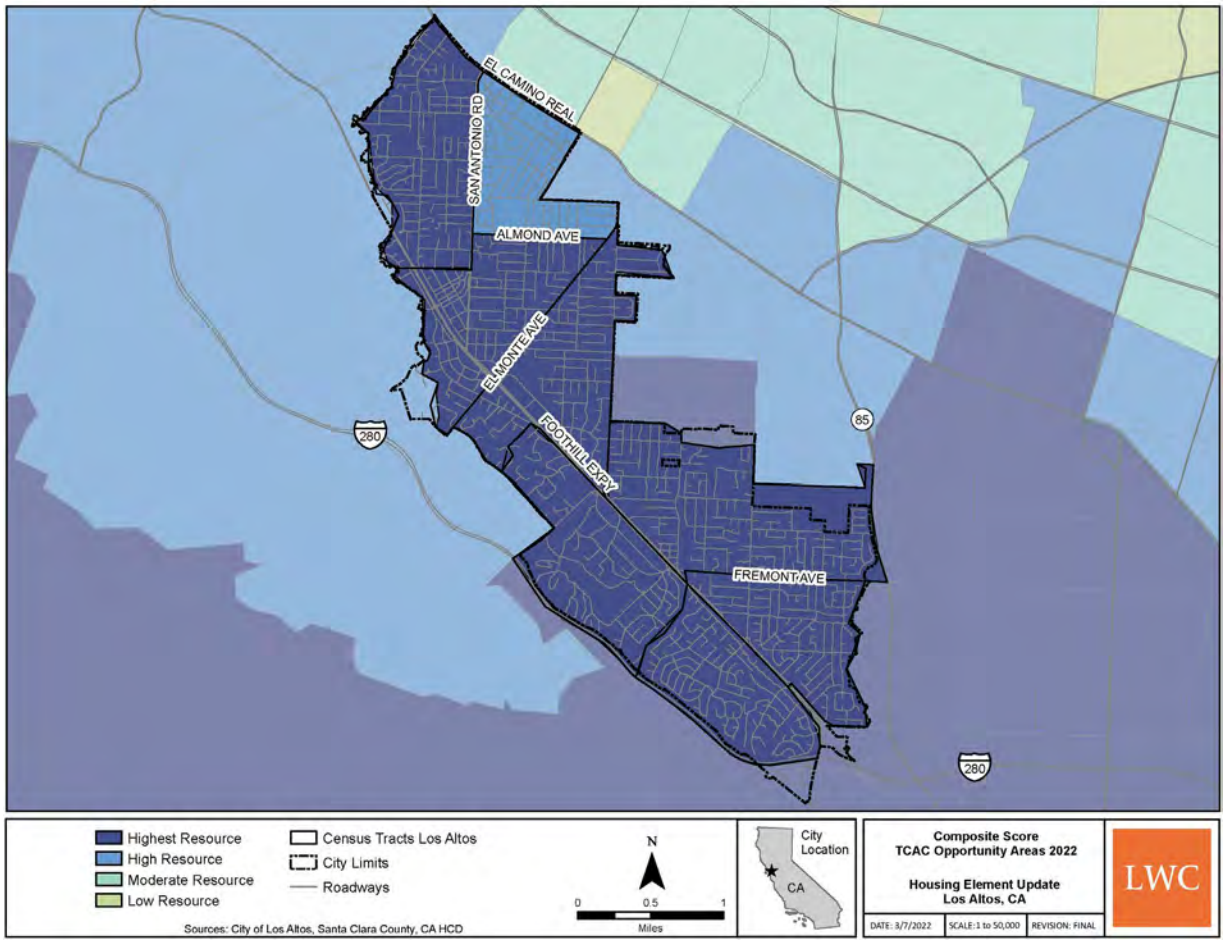
TCAC Opportunity Areas – Composite Score

The 2022 TCAC Opportunity Areas Composite Score provides an aggregate index of three domains: economic, education, and environmental. Census tracts with higher composite scores indicate higher resource areas overall. As shown in Figure F-13, most tracts in Los Altos are in the highest resource category. The northeastern tract, bordered by El Camino Real, San Antonio Road, and Almond Avenue, is a high resource area. This tract scores relatively lower than other areas of Los Altos due to less positive education outcomes and more exposure to environmental hazards for residents in those areas as evidenced by lower education and environmental scores. See below discussions on individual categories that comprise the composite score, including education and environmental conditions. These two characteristics result in a relatively lower Composite Score for this tract.

Areas outside of the city to the north have lower composite scores which reflects the regional trend of generally lower scores in the north and eastern portions of the county. Lower composite scores outside of the city to the north along El Camino Real are mostly the result of much lower environmental and educational ratings with a low economic rating further reducing the composite score to low resource in one tract. Two factors likely contributing to the lower environmental

scores in this area are higher traffic volumes and higher concentrations of commercial and industrial land use.

Figure F-13: TCAC Opportunity Areas 2022 - Composite Score



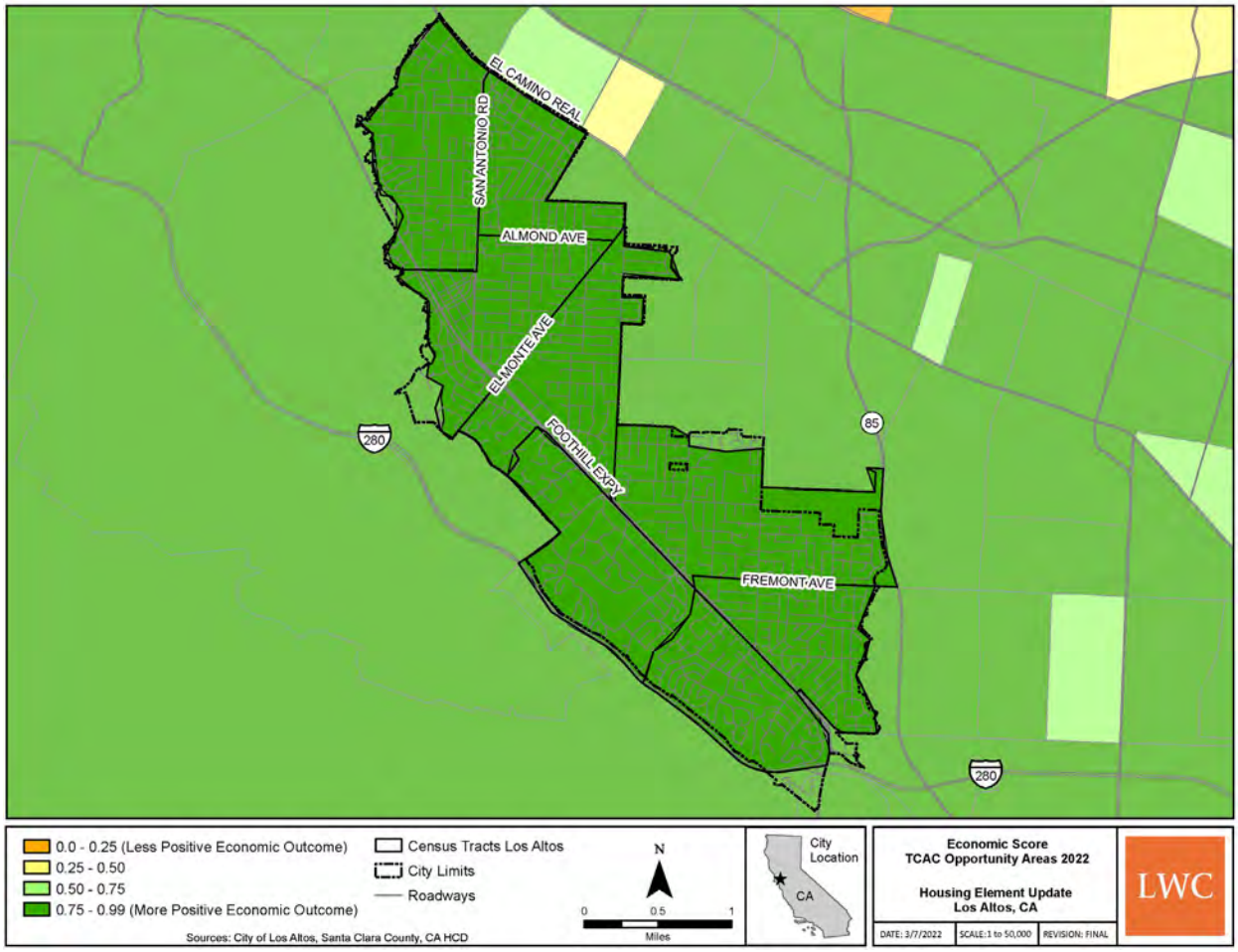
Source: HCD AFFH Spatial Data

Economic Score

The 2022 TCAC Opportunity Areas Economic Score for a census tract is based on poverty, adult education, employment, job proximity, and median home value indicators. The score is broken up by quartiles, with the highest quartile indicating more positive economic outcomes and the lowest score indicating least positive outcomes. The city's census tracts have the highest economic scores of 0.75 to 0.99 as shown in Figure F-14. The high economic scores result from overall high employment and adult education levels (bachelor's degree or above) as well as very low poverty rates. Most of the surrounding areas also have the highest economic scores. Two tracts to the northeast (across El Camino Real in Mountain View) have lower economic scores than Los Altos in the second and third quartile ranges. As noted in the previous section, these areas have higher concentrations of commercial land use and have some apartment developments. However,

surrounding census tracts are otherwise in the same highest economic score range as Los Altos (see below Figure F-14).

Figure F-14: TCAC Opportunity Areas 2022 - Economic Score



Source: HCD AFFH Spatial Data

Education Score

The 2022 TCAC Opportunity Areas Education Score for a census tract is based on math and reading proficiency, high school graduation rate, and student poverty rate indicators. The score is broken up by quartiles, with the highest quartile indicating more positive education outcomes and the lowest quartile signifying less positive outcomes.

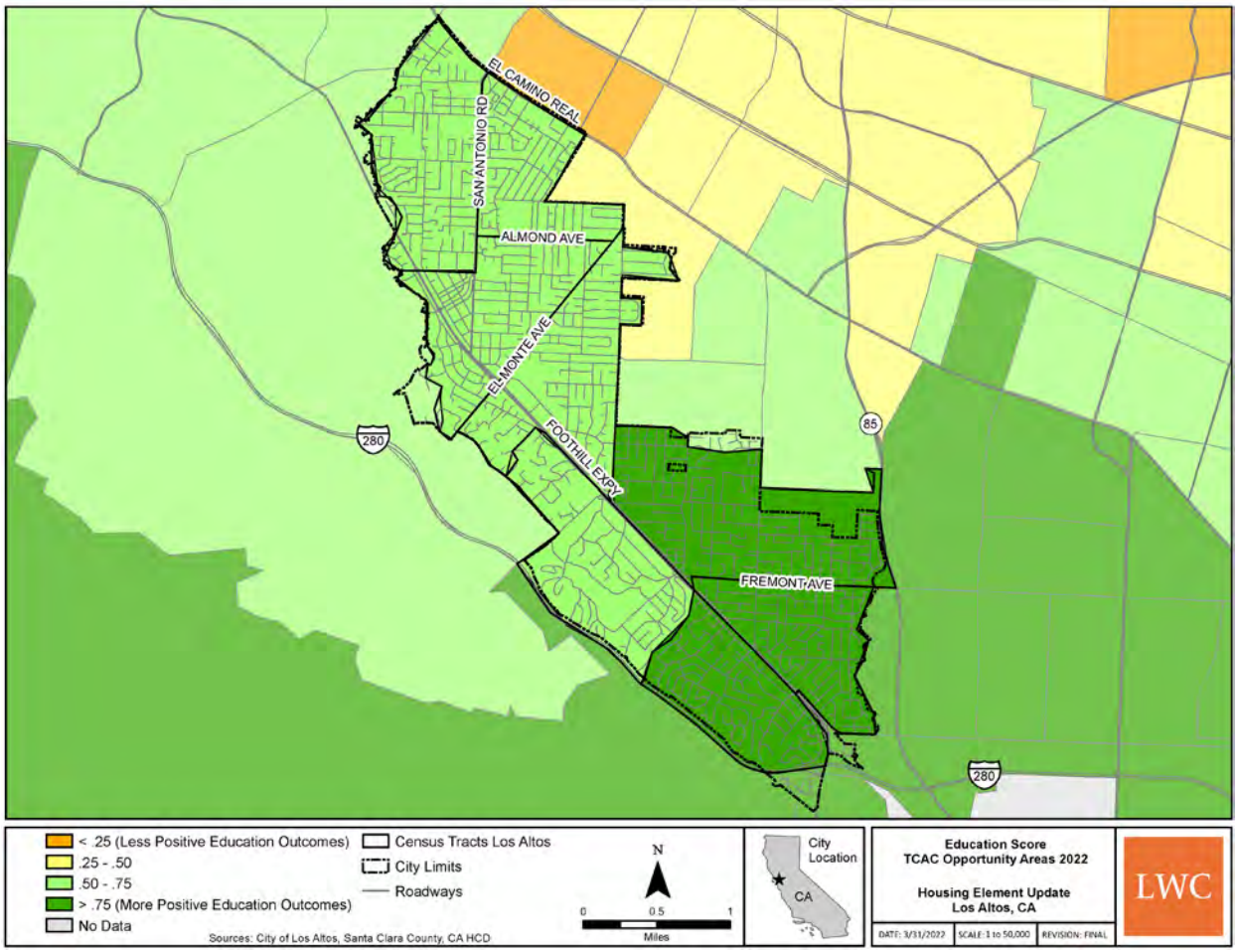
As shown in Figure F-15, most census tracts in the city have a good education score between 0.50 and 0.75. Three tracts in the south have scores greater than 0.75. These scores suggest that the city generally has positive educational outcomes for students.

Los Altos contains seven school enrollment zones in total with some of their boundaries partially overlapping the city. Six of the seven zones are within the 0.50 and 0.75 education score range.

Only one Los Altos school, Oak Avenue School, located north of Fremont Avenue, is within the highest education score area for the city. The two other high education score tracts are outside of Los Altos school districts.

Lower education scores are observed to the northeast in Mountain View. These areas also have higher levels of LMI households so the lower education scores may be the result of higher student poverty rates and reflects elementary schools with higher concentrations of Hispanic or Latino students.[6] Cities to the southwest including Sunnyvale and Cupertino have high education scores similar to those of Los Altos, and likewise, Los Altos Hills to the west has a similar education score to Los Altos.

Figure F-15: TCAC Opportunity Areas 2022 - Education Score



Source: HCD AFFH Spatial Data

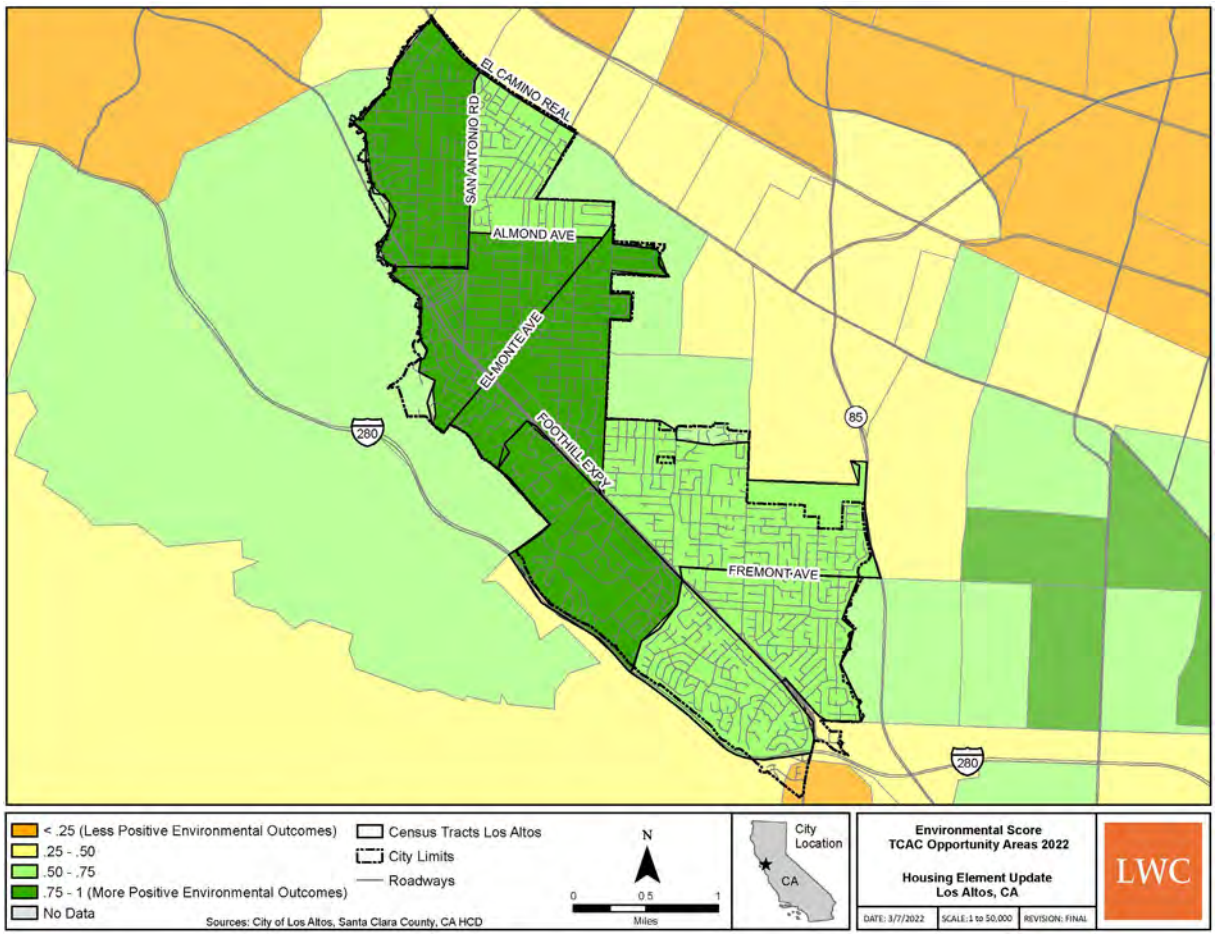
[6] City of Mountain View, Public Review Draft 2023-2031 Housing Element, May 6, 2022.

Environmental Score

Environmental scores for census tracts presented in Figure F-16 are based on 2022. TCAC Opportunity Areas Environmental Scores that reflect environmental risk. The scores are divided into quartiles with higher scores representing more positive environmental outcomes and lower scores indicating least positive environmental outcomes for residents living there.

The city contains two ranges of high environmental scores indicating that residents have generally positive environmental conditions. As shown in Figure F-16, the highest environmental scores are mostly in the western portions of the city. These tracts also score higher than the surrounding areas. Environmental scores decrease to the north and east across Santa Clara County due in part to higher levels of traffic and air pollution within transportation corridors in more concentrated areas.

Figure F-16: TCAC Opportunity Areas 2021 - Environmental Score



Source: HCD AFFH Spatial Data

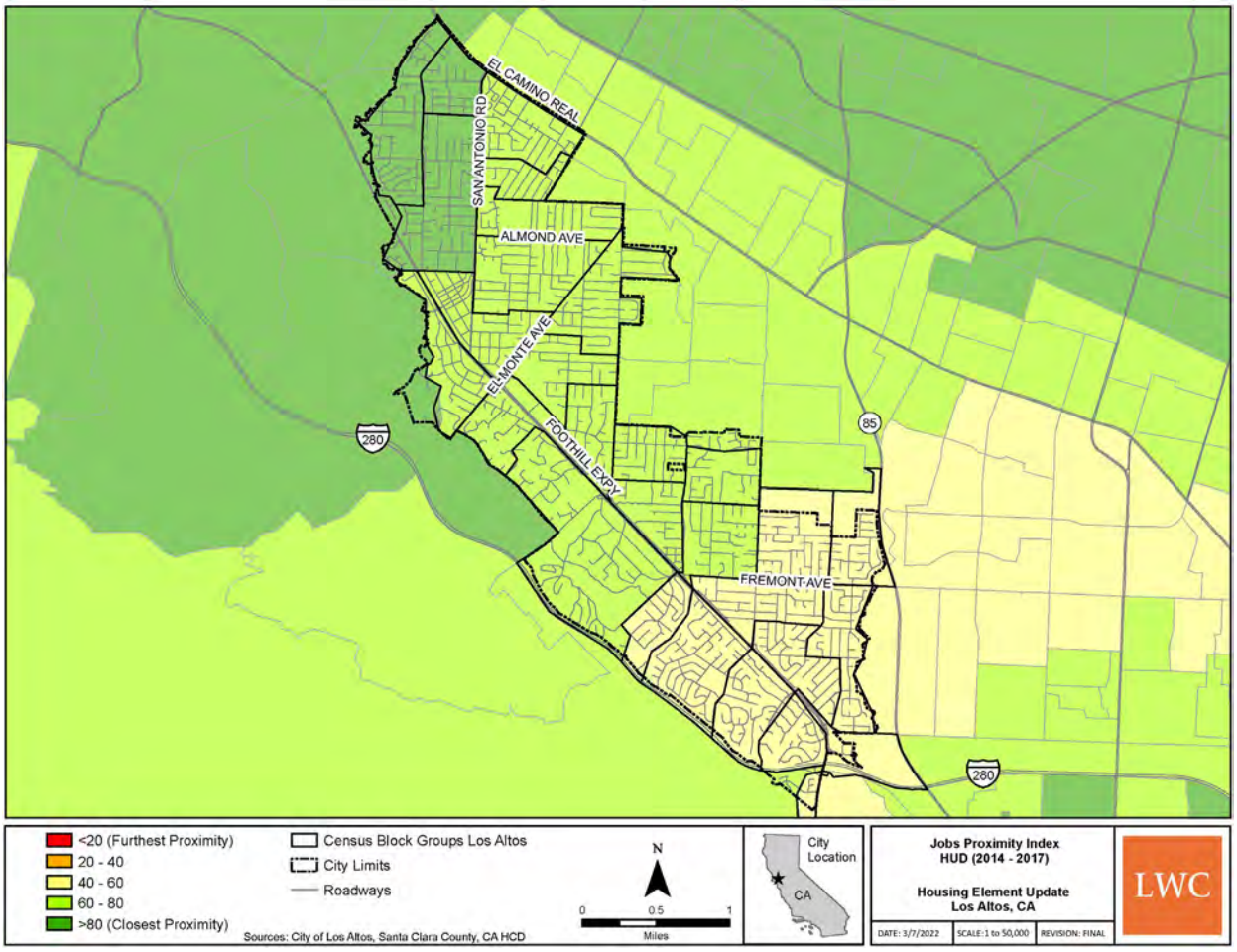
Jobs Proximity Index

HUD's Jobs Proximity Index for a census tract measures the area's distance from employment. This index can be used as a proxy to indicate relative transportation needs in a community. The score is broken up by quintiles, with the highest quintile representing areas closest to job centers. The Jobs Proximity Index score is relatively high across Los Altos with most of the city in the 60 to 80 quintile range as shown in Figure F-17. Scores are highest in the north and lowest in the south. Scores are generally similar in adjacent tracts to the east and west outside of the city while they are lower to the north and south.

Approximately 769 people are both employed and live in Los Altos, which is 6.4 percent of employed Los Altos residents according to 2019 employment data[7]. The largest proportion of employed Los Altos residents work in the City of San Jose (19.5 percent), followed by the City of Mountain View (7.7 percent), the City of Sunnyvale (6.9 percent), and the City of Los Altos (6.4 percent).

[7] Longitudinal Employer-Household Dynamics (LEHD), OnTheMap, 2019.

Figure F-17: Jobs Proximity Index (HUD, 2014-2017)



Source: HCD AFFH Spatial Data

Disparities in Access to Opportunity for Persons with Disabilities

People with disabilities often experience challenges with accessibility, discrimination, and housing choice that make it difficult to find suitable housing to meet their needs. According to the Needs Assessment (Appendix A, Figure A-23), the most common types of disabilities in Los Altos in 2018 were ambulatory disabilities followed by hearing and independent living disabilities.

The California Department of Developmental Services (DDS) currently provides community-based services to approximately 350,000 persons with developmental disabilities and their families through a statewide system of regional centers, developmental centers, and community-based facilities. The San Andreas Regional Center serves individuals and families in Monterey, San Benito, Santa Clara, and Santa Cruz counties. DDS provides data on developmental disabilities by age and type of residence. According to DDS and as shown in the Needs Assessment (Appendix A, Table A-7), there are about 95 residents with a development disability in Los Altos, with most of them (93) able to live in a home with their parent or guardian.

During the Housing Element process, a service provider for the San Andreas Regional Center described the heightened need for accessible units coupled with coordinated supportive services and access to public transit for people with developmental disabilities, who are more likely than the general population to have an accompanying physical disability.

There are a variety of housing types appropriate for people with disabilities, such as licensed and unlicensed single-family homes, group homes, and transitional and supportive housing. The design of housing-accessibility modifications, proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving this need group. The Housing Constraints Appendix (Appendix C) discusses how the City permits various housing types, including the allowance for reasonable accommodations.

Additionally, the Santa Clara County Social Services Agency operates the In-Home Supportive Services (IHSS) program for low-income seniors or people with disabilities. This program provides support for individuals such as meal preparation, laundry, house cleaning, and personal care to enable them to live at home.

Disparities in Access to Transportation Opportunities

The HUD Low Transportation Cost Index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region. These estimates originate from the Location Affordability Index (LAI). Transportation costs are modeled for census tracts as a percent of income for renters in these households. Index values are inverted, and percentile ranked nationally, with values ranging from 0 to 100. Higher index values indicate lower transportation costs in that neighborhood. Transportation costs may be low within a tract for a range of reasons, including greater access to public transportation and the density of homes, services, and jobs in that area.

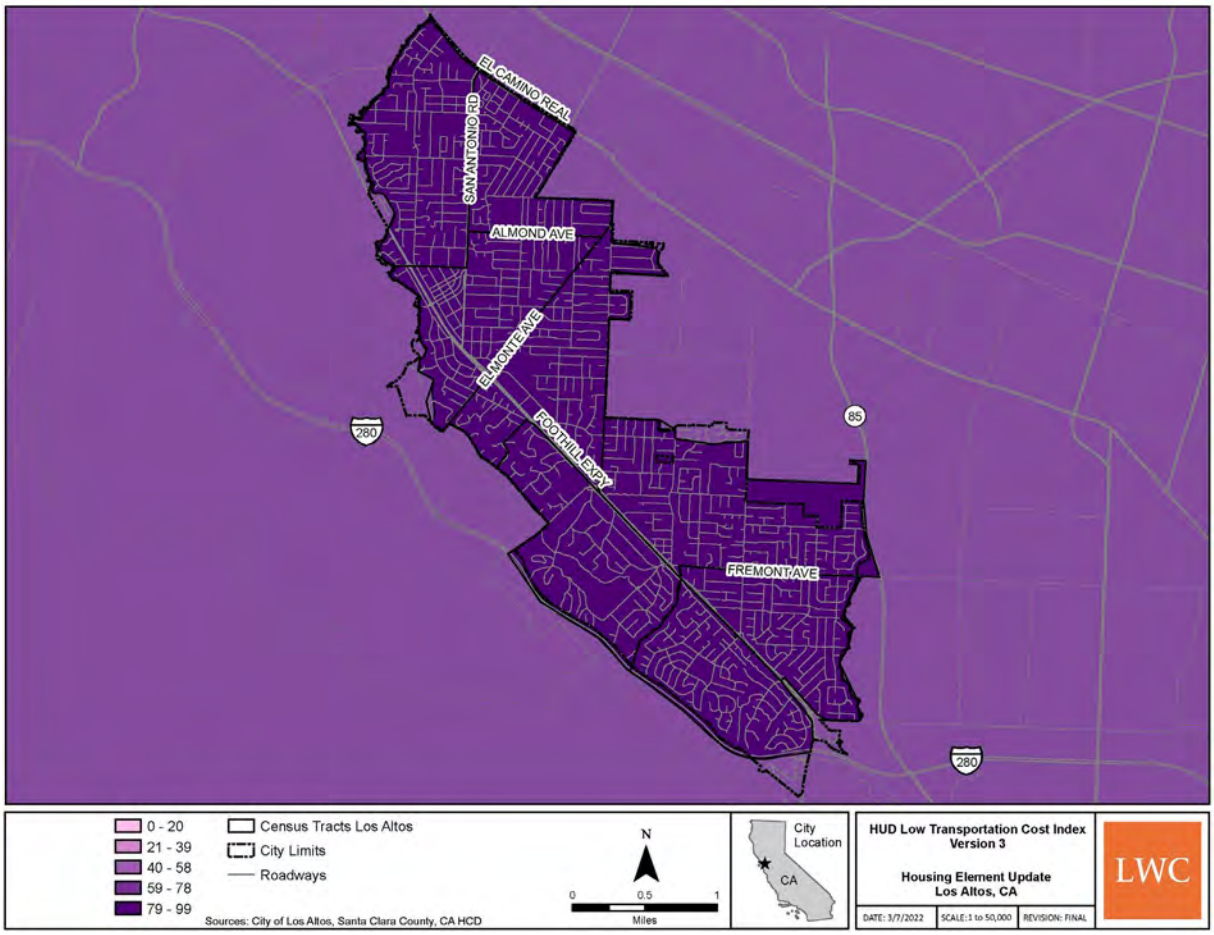
Figure F-18 displays the Transportation Cost Index ranges in Los Altos. The index values are at or above 89 across the city indicating that Los Altos has lower transportation costs than that percentage of the nation. Transportation costs are therefore estimated to be low for a 3-person single-parent family with income at 50 percent of the median income. Transportation costs for renters in the city and access to transportation opportunities are relatively even and closely match adjacent areas outside of the city.

Residents of Los Altos have access to various transit modes. The city contains part of the Santa Clara County bike path network, and some roads have bike lanes for cyclists. According to the Valley Transportation Authority, bus routes within Los Altos include service along San Antonio Road, El Monte Road, and El Camino Real. Bus routes connect Los Altos to the larger Santa Clara Valley Transportation Authority network and CalTrain. As suggested by the uniformity of transportation costs throughout Los Altos shown in Figure F-18 below, issues surrounding access to transportation do not appear to disproportionately impact protected groups or classes. However,

the Community Services Agency of Mountain View and Los Altos noted the importance of walkability and transit for seniors and encouraged the integration of housing into existing commercial areas where shopping, services, and amenities area available. The housing sites inventory reflects integration of housing into commercial areas, including Downtown Los Altos and along key transit corridors such as Foothill Expressway, San Antonio Road, and El Camino Real.

Additionally, comments during the Housing Element process included focusing housing, particularly affordable housing, in areas with transit options and that are walkable with access to services. Several comments requested that additional transportation services for seniors should be addressed. Under Program 4.J the City will implement it's Complete Streets Masterplan and facilitate safe alternative modes of transportation, such as through capital improvement projects and funding of community service organizations to offer rides.

Figure F-18: HUD Low Transportation Cost Index



Source: HUD Spatial Data

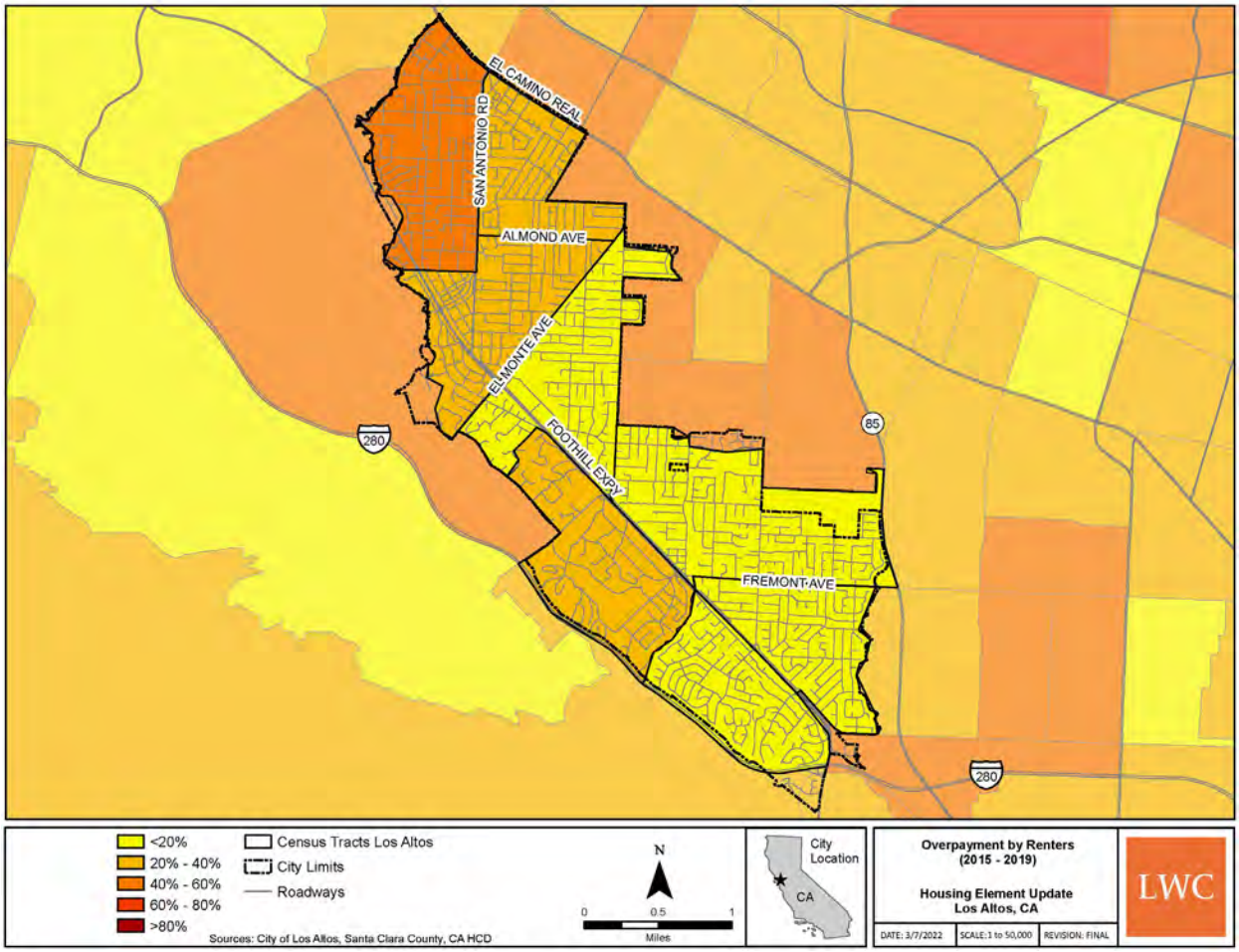
F.2.6 Disproportionate Housing Needs

Overpayment

HUD defines overpayment, or “housing cost burden”, as households paying 30 percent or more of their gross income on housing expenses, including rent or mortgage payments and utilities. Housing cost burden is considered a housing need because households that overpay for housing costs may have difficulty affording other necessary expenses, such as childcare, transportation, and medical costs.

Renters are typically more likely to overpay for housing costs than homeowners. The percentage of renter households exhibiting cost burden varies across the city from less than 20 percent to between 40 and 60 percent (Figure F-19). The highest renter overpayment percentage is in the northwestern area of the city that ranks relatively high on both the Location Affordability Index and the Jobs Proximity Index, which indicates that rental costs are elevated closer to job centers and around half of renter households find it difficult to afford those costs.

Figure F-19: Overpayment by Renters (2015 - 2019)

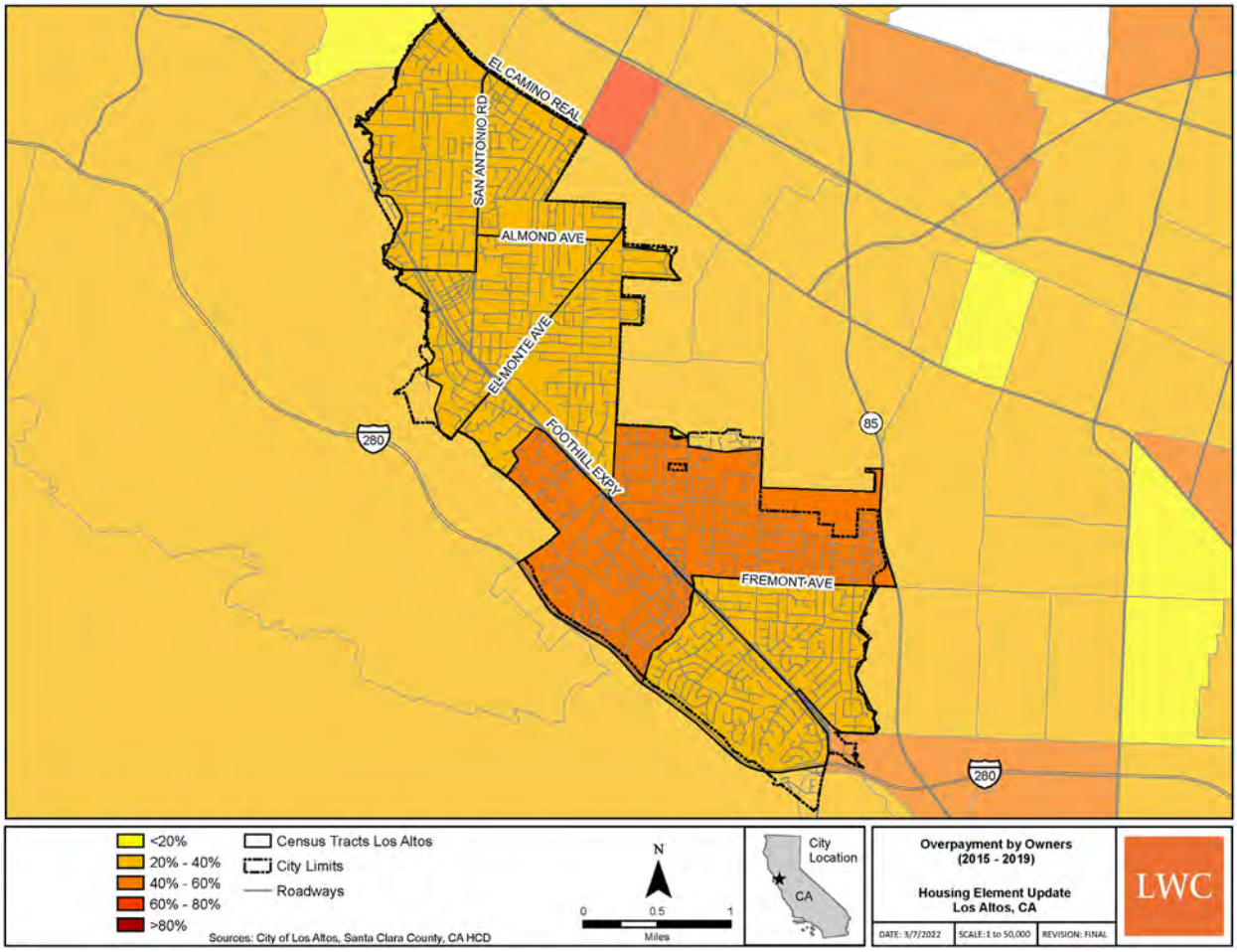


Source: HCD AFFH Spatial Data

Homeowners generally experience a lower rate of cost burden than renters. Figure F-20 shows the percentages of homeowners experiencing overpayment for the 2015 to 2019 time period. Percentages of homeowners with overpayment range from approximately 20 percent to 60 percent across the city, the same ranges as renters experiencing overpayment. The area with the highest percentages of homeowner overpayment are high resource areas with high education scores. Homeowner overpayment areas also score relatively high on the Location Affordability Index which indicates that some homeowners experience difficulty affording their combined living costs for housing and transportation.

Although Los Altos has a lower proportion of cost-burdened households compared to the county and the Bay Area (Housing Needs Assessment, Appendix A, Section A.5.3), housing affordability of housing was a key issue raised throughout the Housing Element update process. Housing in Los Altos is unaffordable to many households, including critical workers (e.g., teachers, firefighters, service industries, etc.), and not just lower income households. This was also reflected in responses to the community feedback form/questionnaire distributed to businesses and workers, where limited availability of affordable units, lack of resources to find affordable housing, and long waitlists were identified as barriers.

Figure F-20: Overpayment by Owners (2015 - 2019)



Source: HCD AFFH Spatial Data

Overcrowding

Overcrowding is defined by the Census as a unit in which more than one person occupies a room (excluding bathrooms and kitchens) while severe overcrowding occurs when more than 1.5 people occupy a room. Overcrowded households are an indicator of housing needs, as lower income families or individuals may choose to live together in smaller spaces to save money on housing costs.

In addition to the strain on residents' mental and physical health, overcrowding can also lead to more rapid deterioration of the property due to increased usage. Overall 0.6 percent of households in Los Altos experienced overcrowding and 0.1 percent experienced severe overcrowding according to ACS 2019 five-year data. The city's overcrowding rates are lower than Santa Clara County overcrowding and severe overcrowding rates of 5.2 and 4.7 percent, respectively (Table F-7). Overcrowding is more prevalent in renter households (see Housing Needs Assessment, Appendix A, Section A.3.2).

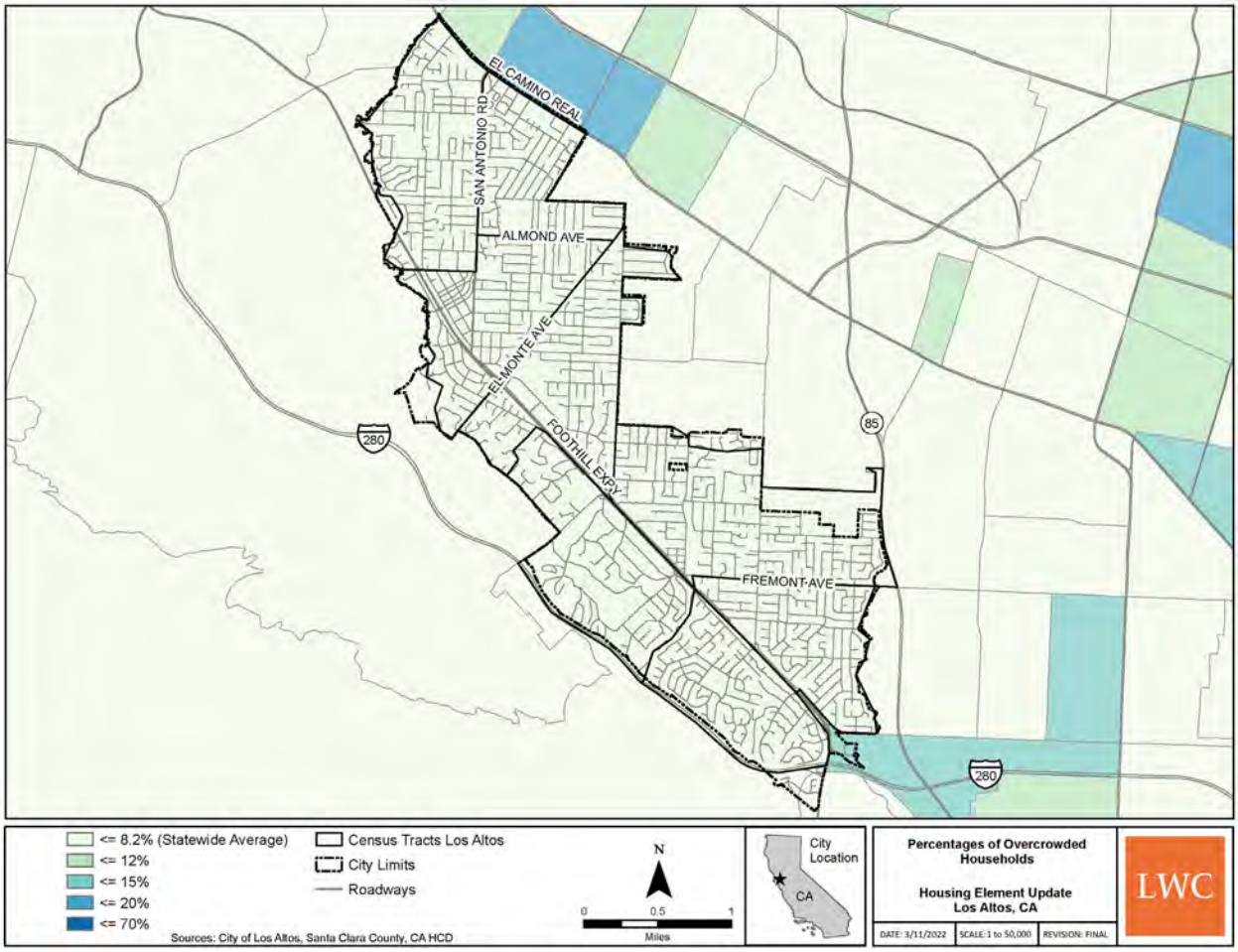
Table F-7: Overcrowding and Severe Overcrowding Rates

	Los Altos		Santa Clara County
Occupants Per Room	**Units**	**Percentage**	**Percentage**
1.01 to 1.5	68	0.6%	5.2%
1.51 or more	13	0.1%	2.9%
Source: ACS 2019 5-Year Estimates, Table DP04			

Estimated percentages of overcrowded households in Los Altos by census tract are shown in Figure F-21. The highest overcrowding percentage is about 2.5 percent and is found in the southernmost tract located south of Foothill Expressway. Half of the tracts contain overcrowding rates of zero percent. Overcrowding levels in adjacent areas are mostly similar to the city but are higher in some areas to the north and south.

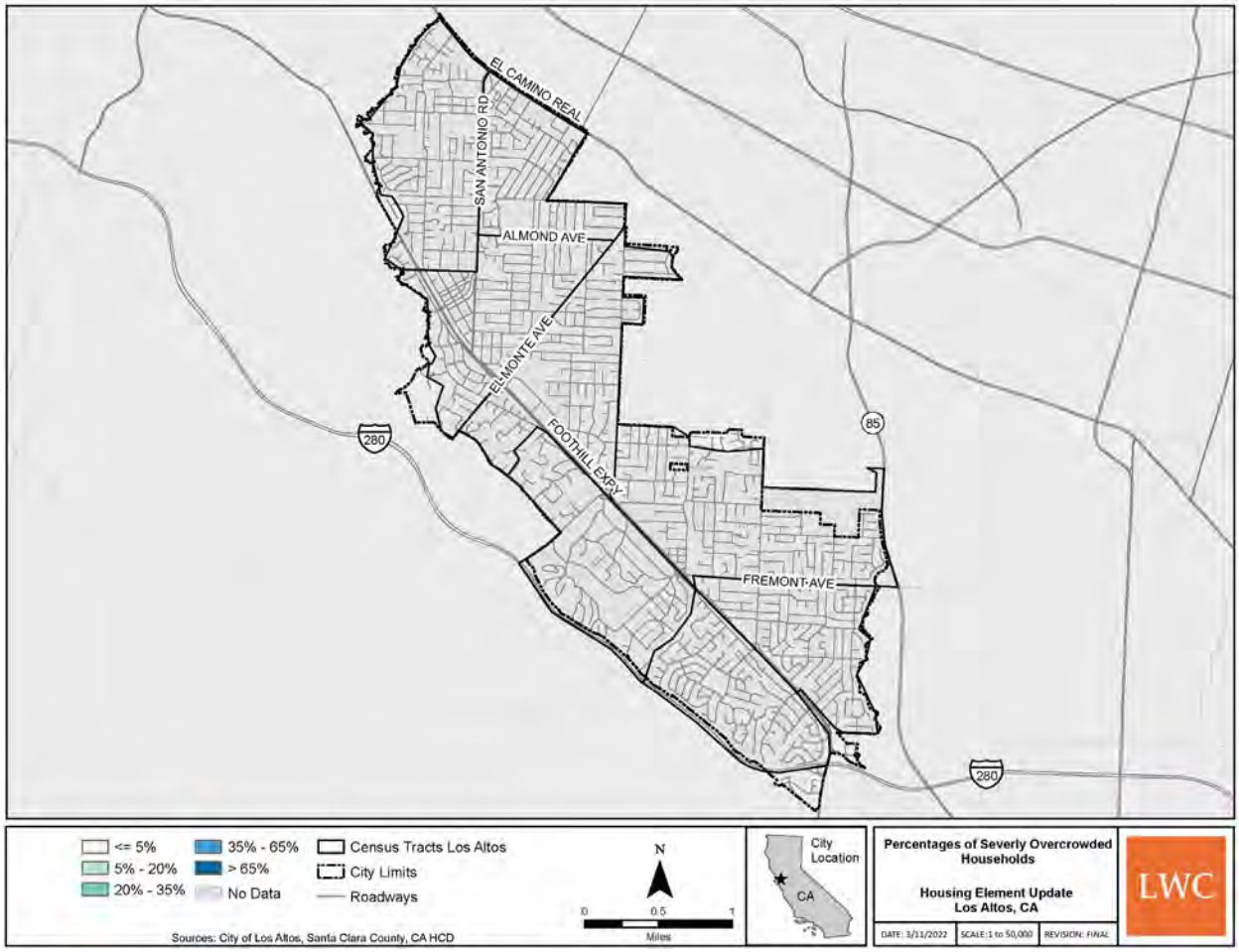
The statewide spatial data for severe overcrowding did not contain any values in the vicinity of Los Altos as shown in Figure F-22.

Figure F-21: Overcrowded Households HUD, CHAS, ACS (2020)



Source: HCD AFFH Spatial Data

Figure F-22: Severely Overcrowded Households HUD, CHAS, ACS (2020)



Source: HCD AFFH Spatial Data

In Los Altos, rates of overcrowding are highest for Hispanic households, followed by Asian households. As with disability status, age likely plays some role in explaining racial and ethnic disparities in overcrowding. Relatively younger adults, around the age of the median-age Hispanic households, are more likely to have minor children in their households, which, in turn, increases the likelihood of overcrowding. Conversely, older adults closer to the median-age of White households, are more likely to reside in one- or two-person households.

Table F-8: Occupants per Room for Households by Race and Ethnicity

Race or Ethnicity	Total Households	% in Overcrowded Units*
White Alone, Not Hispanic or Latino	6.,903	0.3%
Black or African American Alone	40	0.0%
Asian Alone	3,111	1.4%
Hispanic or Latino (of any race)	334	2.4%

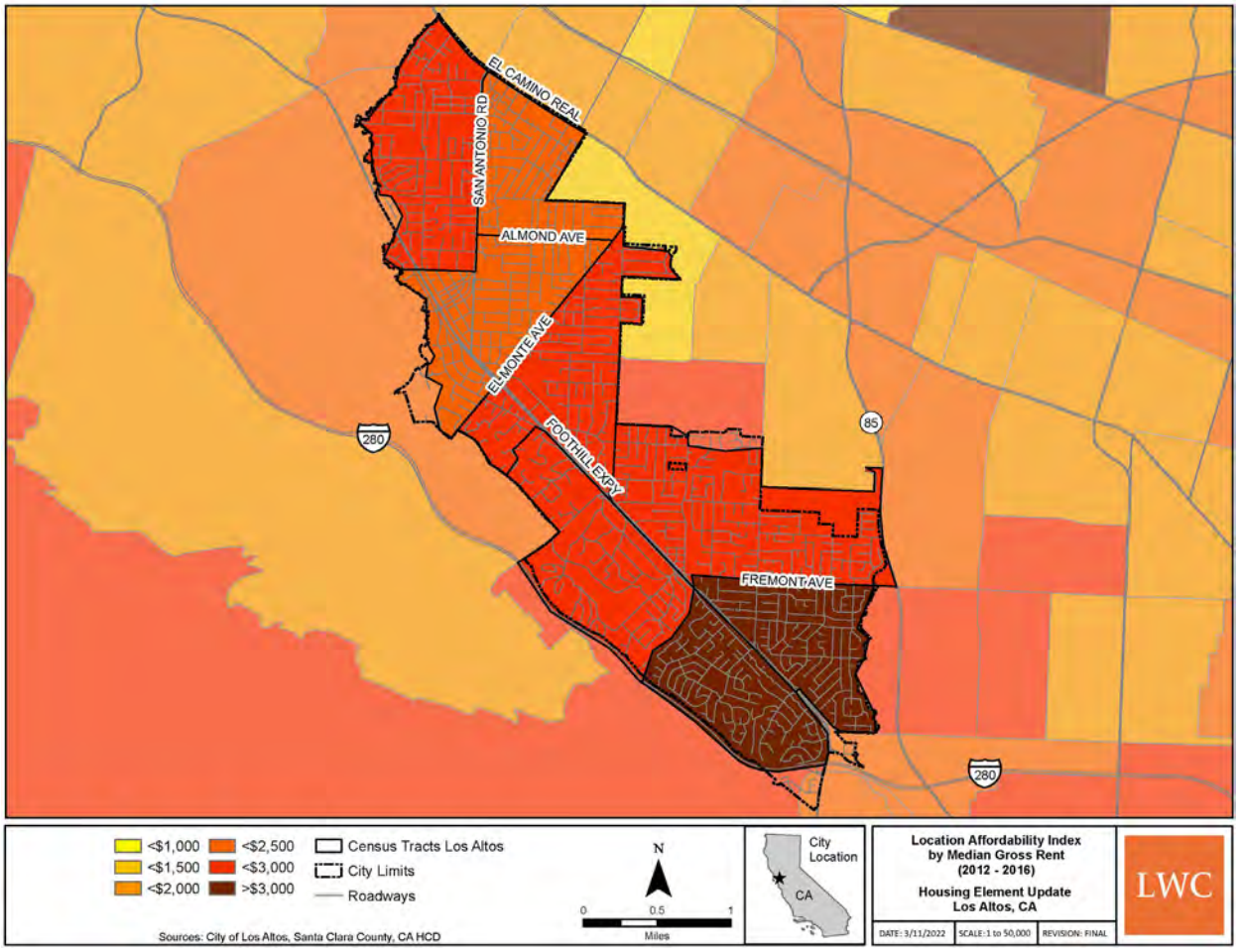
* Overcrowded units defined as 1.01 or more occupants per room.

Source: Lawyer's Committee, Baird + Driskell Community Planning; ACS 2019 5-Year Estimates

Location Affordability Index

Figure F-23 shows HUD's Location Affordability Index for 2012 to 2016 in Los Altos. This index estimates household housing and transportation cost on a neighborhood-scale. As shown in this figure, the index in half of the tracts have values up to $3,000 per month. The city contains higher index values (greater than $3,000) in two census tracts in the southern portion of the city, south of Fremont Avenue. These tracts score highest for this index but are not the highest areas for overpayment, however. Adjacent tracts generally have lower Location Affordability Index scores than the city.

Figure F-23: Location Affordability Index HUD (2012 – 2016)



Source: HCD AFFH Spatial Data

Substandard Housing

Incomplete plumbing or kitchen facilities can be used as a proxy to indicate substandard housing conditions. Los Altos and Santa Clara County have very similar substandard housing rates as summarized in Table F-9. According to the 2015 to 2019 ACS, 0.2 percent of Los Altos households lacked complete plumbing installations, which is slightly lower than Santa Clara County overall at 0.3 percent. The estimate of Los Altos households without complete kitchen facilities is 0.8 percent while the county estimate is at 0.9 percent. Substandard housing, which exist at very low percentages in Los Altos and the region, is not concentrated in any one area within the city.

Table F-9: Substandard Housing Rates

	Los Altos		Santa Clara County
Substandard Housing	**Units**	**Percentage**	**Percentage**
Lacking complete plumbing facilities	18	0.2%	0.3%
Lacking complete kitchen facilities	85	0.8%	0.9%
Source: ACS 2019 5-Year Estimates, Table DP04			

The age of housing stock can also be an indicator of substandard housing. As homes get older, there is a greater need for maintenance and repair. If not properly addressed, an aging housing stock can result in poorer living standards, incur more expensive repair costs and, under certain conditions, lower overall property values. See Housing Needs Assessment (Appendix A, Section A.4.4) for additional information on housing stock age and condition.

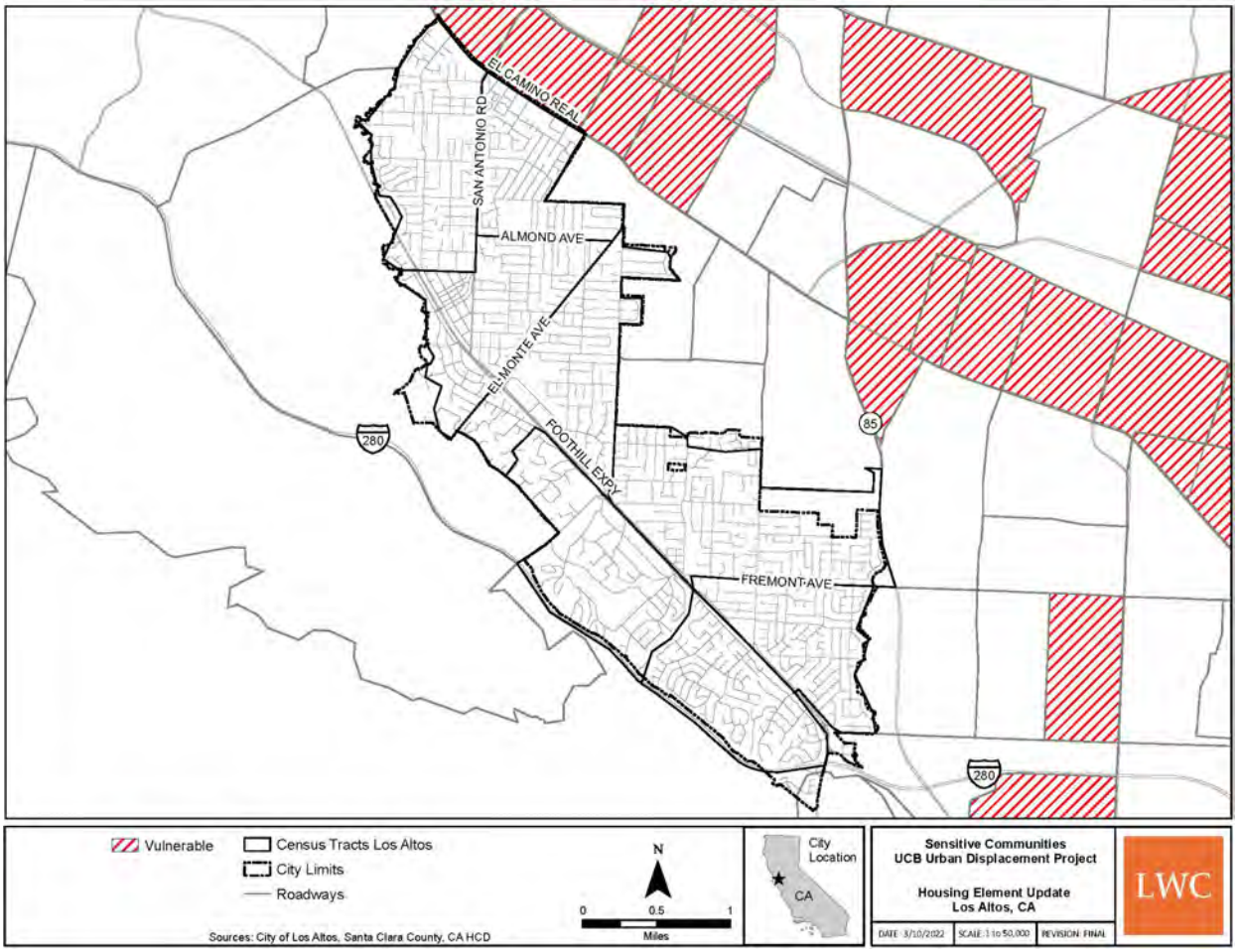
Displacement Risk

The University of California Berkeley's Urban Displacement Project (UDP) uses data-driven research to produce maps identifying sensitive communities that are at-risk of displacement. UDP defines sensitive communities as currently having "populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost". Vulnerability was determined based on the following characteristics:

- The share of very low-income residents is above 20 percent;
  AND
- The tract meets two of the following criteria:
  - Share of renters is above 40 percent
  - Share of people of color is above 50 percent
  - Share of very low-income households that are severely rent burdened households is above the county median
  - Percent change in rent is above county median rent increase
  - Rent gap, which is the difference between tract median rent and median rent for surrounding areas

UDP has not identified any vulnerable communities at-risk of displacement within the city (Figure F-24). Furthermore, the environmental analysis for this Housing Element does not identify any risk of displacement to groups with protected characteristics on account of any natural disasters. Although several faults are located near Los Altos, no part of Los Altos is located within an identified earthquake fault zone.

Figure F-24: Vulnerable Communities



Source: HCD AFFH Spatial Data

Homelessness

Information on homelessness and resources for persons experiencing homelessness in Los Altos is described in the Housing Needs Assessment (Appendix A, Section A.3.4, People Experiencing Homelessness).

Between 2017 and 2019, Los Altos saw its homeless population increase over tenfold, from six to 76 people. This is higher than the rate of increase in the county, 31 percent, during the same period (7,394 to 9,706 people experiencing homelessness). Los Altos' homeless population is less than one percent of the county's homeless population. While White residents represent the largest proportion of Santa Clara County residents experiencing homelessness, making up just under 44 percent of the homeless population, Black or African American and American Indian or Alaska Native residents are overrepresented – accounting for 18.8 and 8.1 percent of the homeless population while only making up 2.5 and 0.5 percent of the overall population of the county respectively.

Los Altos is part of the Santa Clara County Continuum of Care (CoC) in the Office of Supportive Housing, which is a regional planning body funded by HUD that coordinates housing and services funding across its partner jurisdictions.

F.2.7 Other Relevant Factors

Rates of Homeownership by Race and Ethnicity

The home ownership rate is about 81 percent in Los Altos compared to about 56 percent for Santa Clara County. The 2019 ACS data for percentages of occupied housing units by race is presented in Table F-10.

Not all racial and ethnic groups in Los Altos have a similar likelihood of owning a home. The rates of home ownership are lower than renting for Blacks, American Indians, residents of two or more races, and Latinos according to the ACS data. The ownership rate is similar to renting for other ethnic groups. Racial and ethnic groups that have much lower rates of homeownership are more at risk of being displaced due to rising rental prices.

Table F-10: Housing Tenure by Race/Ethnicity in Los Altos (2019)

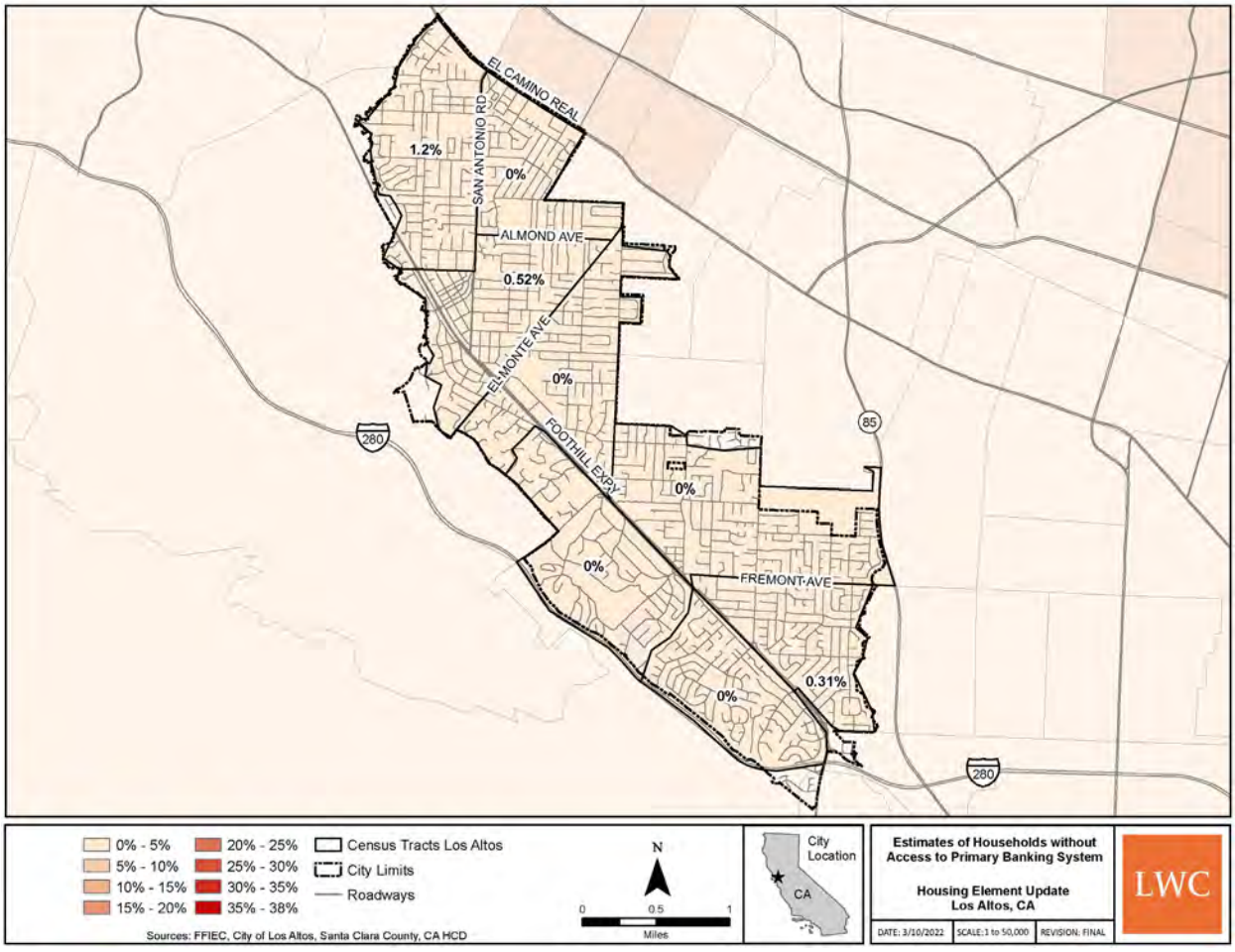
Los Altos	Renter Occupied Units		Owner Occupied Units		Total Occupied Units
	Number	% of Total	Number	% of Total	
White alone, not Latino	1,254	62.0%	5,649	65.5%	7,166
Black or African American alone	31	1.5%	9	0.1%	40
American Indian and Alaska Native alone	7	0.3%	0	0.0%	7
Asian alone	496	24.5%	2,615	30.3%	3,111
Native Hawaiian/Other Pacific Islander alone	0	0.0%	0	0.0%	0
Some other race alone	10	0.5%	61	0.7%	71
Two or more races	103	5.1%	154	1.8%	257
Hispanic or Latino origin	149	7.4%	185	2.1%	334
TOTAL	**2,050**	**19%**	**8,673**	**79%**	**10,986**
Source: ACS 2019 5-Year Estimates, Table S2502					

One obstacle to home ownership is lack of access to the first tier of the financial system to obtain banking services and loans. The Federal Financial Institutions Examination Council's (FFIEC) provides the Community Reinvestment Act (CRA) July 2021 census tract spatial data known as CRAMap 2021 (www.ffiec.gov/cra/). Included in the CRAMap 2021 spatial data is the Unbanked index (developed by RPM Consulting) which provides an estimate of households lacking access

to the primary banking system. This index estimates the likelihood of a household will lack both a savings and checking account with a bank, thrift, or credit union.

Figure F-25 presents estimates for the percentages of households that lack access to banking and credit from the CRAMap 2021 Unbanked index. Identifying areas with relatively higher levels of residents without access to the primary banking system can facilitate the process of providing them first-tier financial services. This may aid lower income residents in avoiding a dependency on second-tier services, particularly predatory lenders. Estimates for the percentages of households without access to primary banking and credit is very low across the city.

Figure F-25: Percentage of Households without Access to Banking or Credit



Source: FFIEC CRAMap 2021 Spatial Data

F.2.8 Summary of Fair Housing Issues

Access to opportunity in Los Altos is approximately evenly distributed across the city as evidenced by the relatively consistent TCAC scores citywide. However, the northwest area of the city, including Downtown, meets the criteria to be considered a Racially or Ethnically Concentrated Areas of Affluence (RCAA), evidence that some non-white residents may experience different

economic conditions than white residents. Black, American Indians, and residents of two or more races are more like to experience poverty and are less likely to own their home than other racial groups.

A citywide fair housing issue is overpayment by renters and homeowners, although homeowners are more cost burdened than renters. Almost 23 percent of renters (457 households) are cost burdened, compared to 28 percent of homeowners (2,416 households). The city also contains high to very high Location Affordability Index rates.

The primary fair housing issue in Los Altos is disproportionate housing needs because it is likely to affect the most residents and protected classes. The contributing factor to this primary issue is land use and zoning laws either limiting where multi-family housing can be built or procedures resulting in a protracted entitlement effort. This contributing factor is evident due to the high levels of overpayment by homeowners and renters within both higher and lower income households. The data indicates that higher and lower income households, encompassing various household sizes and characteristics, may choose more affordable housing if available.

The second fair housing issue is also disproportionate housing needs due to the contributing factor of a lack available affordable units in a range of sizes. A combination of very high Location Affordability Index rates and high levels of overpayment indicate the need for more affordable housing, which could be provided through smaller unit sizes and a mix of housing types. The number of cost-burdened households indicates that many residents are struggling to afford housing costs which can lead to increased homelessness rates for at-risk populations.

The third fair housing issue is segregation and integration because of community opposition to building more affordable housing in the city. This is evident in the development review process, which requires multiple review bodies and meetings (often with City Council approval) and cumbersome requirements (e.g., installation of story poles). Public comments expressed that the City's review process, ranging from accessory dwelling units to large projects, is a challenge to building housing in Los Altos.

The fourth fair housing issue is also segregation and integration due to the contributing factor of limited options for affordable housing, as clearly demonstrated by public comments throughout the Housing Element process. Comments identified that the availability of affordable housing is a critical issue, and housing affordable to low and moderate-income households, families, essential workers, and seniors is needed. New residential development throughout Los Altos would provide housing in high and highest resources areas, as well as in Racially or Ethnically Concentrated Areas of Affluence (RCAA). The RCAAs in Los Altos include Downtown, San Antonio Road, and the west portion of El Camino Real, where various housing sites are located.

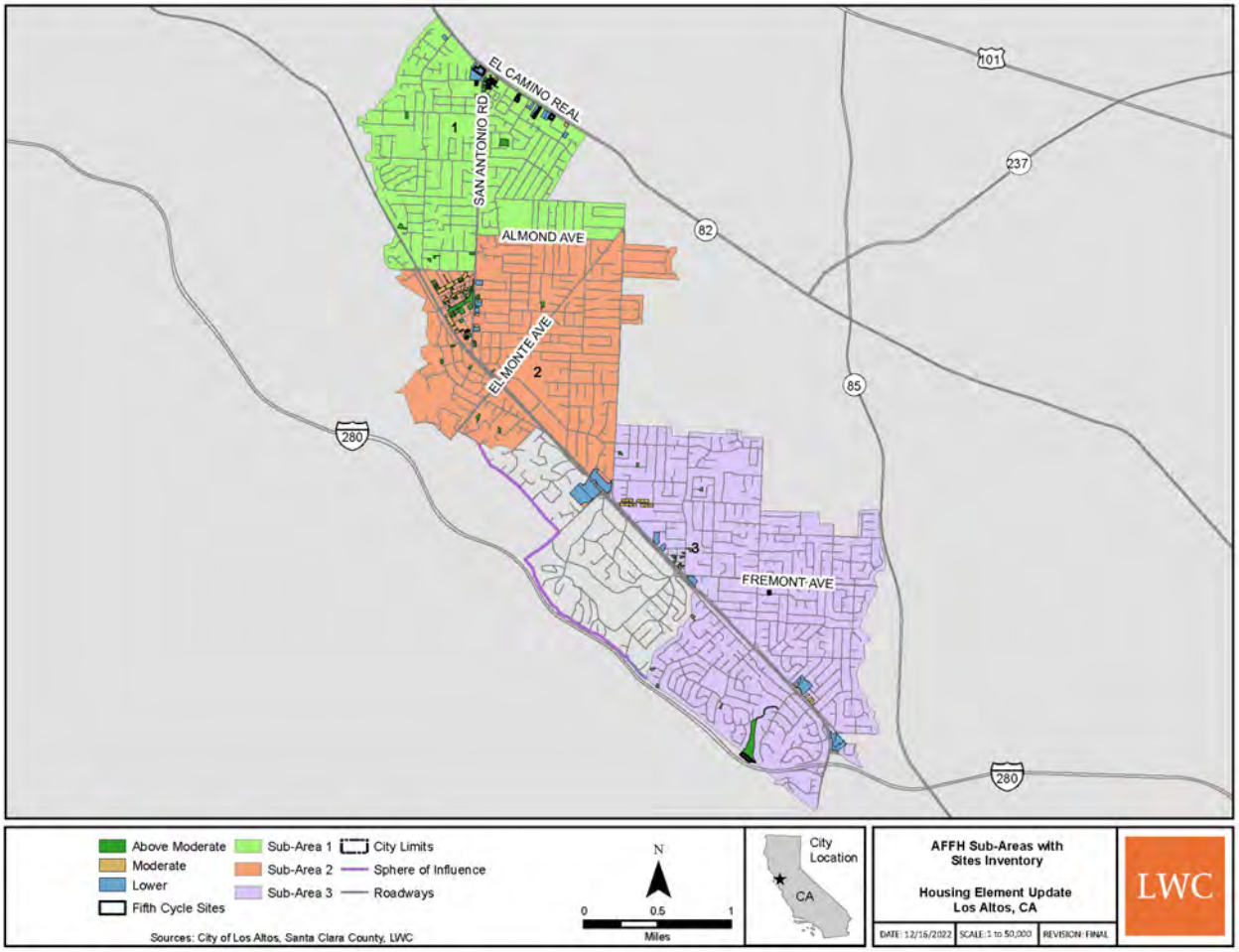
Section F.3 Sites Inventory

AB 686 requires a jurisdiction's site inventory to be consistent with its duty to affirmatively further fair housing. This section evaluates the city's site inventory locations against various measures in the Assessment of Fair Housing that includes income level, racially and ethnically concentrated areas of poverty, access to opportunity, and environmental risk to determine any socio-economic patterns or implications.

F.3.1 Sub-Area Analysis

This section describes the three sub-areas of Los Altos that were analyzed to compare conditions across the city. The Los Altos Sub-Areas include Sub-Area 1 in the north, Sub-Area 2 located centrally, and Sub-Area 3 in the south. The sub-area geographies reflect areas that share similar qualities such as income levels, race and ethnicity, and concentrated areas of poverty, although some characteristics are quite similar across Los Altos. The sub-area boundaries are also based on census tract boundaries that approximate the City's boundaries. The goal of the sub-area analysis is to ensure that the City's housing policies do not contribute to existing fair housing challenges.

Figure F-26: Los Altos Sub-Areas



As shown in Table F-11, demographics characteristics and other conditions are mostly similar across Los Altos. All three sub-areas score as Highest Resource TCAC areas and are predominantly White. The percentage of Non-White for Sub-Areas 1, 2, and 3, are 37.6 percent, 35.3 percent, and 41.8 percent respectively. However, there are some moderate differences among the sub-areas. Sub-Area 2 has a notably lower share of renters that are cost-burdened compared to the other sub-areas, and Sub-Area 3 has a slightly higher share of homeowners that cost-burdened relative to the other sub-areas. The percentage of renter households that are overpaying is 20.2 percent in Sub-Area 2 compared to 32.1 percent in Sub-Area 1 and 35.2 percent in Sub-Area 3. The percentage of homeowners overpaying in Sub-Area 3 is 39.3 percent compared to around 33 percent in Sub-Areas 1 and 2. Sub-Area 3 also has a greater share of households that are overcrowded at 3.8 percent compared to 0.8 percent in Sub-Area 1 and 0.7 percent in Sub-Area 2. As such, the distribution of housing sites does not perpetuate segregation or isolate the RHNA, and programs would promote lower and moderate-income housing throughout Los Altos, such as through the inclusionary zoning, accessory dwelling units, SB 9 implementation, and other programs that facilitate the development of below market rate housing.

Table F-11: Sub-Area Analysis Summary

APN	Census Tracts	Total Households	Affordable Level	Total Units	TCAC	% Non-White	% Low-Moderate Income Households	R/ECAP	RCAA	% Married Households with Children	% Children Female Headed Households	% People Who are Disabled	% Overcrowded	% Overpayment Renter	% Overpayment Owner
Sub-Area 1	**6085510400, 6085510500**	**3,410**	**Above Moderate/ Moderate/ Lower**	**576**	**High/Highest Resource**	**37.6%**	**15.5%**	**0**	**1**	**92.2%**	**5.7%**	**5.1%**	**0.8%**	**32.1%**	**33.0%**
17001023	6085510400	1,328	Above Moderate	4	High Resource	43.9%	14.6%	0	1	91.4%	5.9%	1.5%	2.1%	21.8%	32.6%
17001025			Above Moderate	7											
17001026			Above Moderate	3											
17001027			Above Moderate	6											
17001029			Above Moderate	1											
17001030			Above Moderate	2											
17001032			Above Moderate	5											
17001035			Above Moderate	2											
17001036			Above Moderate	2											
17001042			Above Moderate	3											
17001043			Above Moderate	5											
17001045			Above Moderate	2											
17001047			Moderate	8											
17001049			Above Moderate	3											
17001051			Above Moderate	6											
17001064			Above Moderate	3											
17001086			Above Moderate	6											
17001088			Moderate	8											
17003083			Above Moderate	8											
17003073			Lower	42											
17004065			Moderate	13											
17012042			Above Moderate	5											
17064119			Lower	38											
17064120			Lower	31											
17003077			Lower	28											
17004050			Lower	25											
17003084			Lower	22											
17002023			Lower	22											
17001055			Lower	11											
17004045			Lower	11											
16716022	6085510500	2,082	Moderate	10	Highest Resource	33.2%	16.1%	0	1	92.8%	5.6%	8.0%	0.0%	43.0%	33.3%
16720050			Above Moderate	1											
16735076			Above Moderate	1											
16736008			Above Moderate	1											
16736068			Above Moderate	1											
16737034			Above Moderate	1											
16716018			Above Moderate	8											
16712047			Lower	67											
16712045			Lower	23											
16710094			Lower	20											
16712042			Lower	111											

Sub-Area 2	**6085510200, 6085510300, 6085511702**	**4,339**	**Above Moderate/ Moderate/ Lower**	**553**	**Highest Resource**	**35.3%**	**14.1%**	**0**	**1**	**88.8%**	**7.6%**	**5.4%**	**0.7%**	**20.2%**	**33.4%**
18956014			Lower	82											
33602008	6085510200	1,529	Above Moderate	1	Highest Resource	36.0%	15.7%	0	1	90.6%	6.3%	7.2%	0.5%	6.9%	27.5%
33603030			Above Moderate	1											
16738002			Above Moderate	28											
16738028			Moderate	8											
16738029			Moderate	8											
16739007			Moderate	16											
16739032			Moderate	15											
16739057			Moderate	8											
16739069			Moderate	8											
16741003			Moderate	14											
16738008			Moderate	4											
16738010			Above Moderate	2											
16738011			Above Moderate	2											
16738012			Above Moderate	1											
16738013			Above Moderate	1											
16738020			Moderate	4											
16738021			Above Moderate	2											
16738024			Above Moderate	1											
16738025			Above Moderate	1											
16738038			Moderate	5											
16738057			Above Moderate	1											
16738065			Above Moderate	6											
16738049			Above Moderate	3											
16738050			Above Moderate	2											
16738051			Above Moderate	1											
16738052			Above Moderate	1											
16739040			Above Moderate	7											
16739041			Above Moderate	7											
16739042			Above Moderate	4											
16739043			Above Moderate	4											
16739044			Above Moderate	7											
16739045			Above Moderate	7											
16738053			Above Moderate	1											
16739011			Above Moderate	1											
16739012			Above Moderate	1											
16739060			Above Moderate	1											
16739064			Above Moderate	2											
16739074			Above Moderate	1											
16739075			Above Moderate	1											
16739076			Above Moderate	2											
16739084			Above Moderate	1											
16739085			Above Moderate	1											
16739089			Above Moderate	1											
16739091	6085510300	1,810	Above Moderate	1	Highest Resource	33.5%	16.4%	0	1	88.3%	10.9%	5.1%	1.4%	22.4%	33.9%
16739097			Above Moderate	2											

16739127			Above Moderate	7											
16739105			Above Moderate	1											
16740003			Above Moderate	2											
16740039			Above Moderate	15											
16740042			Above Moderate	2											
16740050			Above Moderate	7											
16740051			Above Moderate	7											
16740052			Above Moderate	7											
16740056			Above Moderate	11											
16740072			Above Moderate	15											
16740073			Above Moderate	2											
16740004			Above Moderate	1											
16741006			Above Moderate	4											
16741007			Moderate	11											
16741016			Above Moderate	5											
16741018			Above Moderate	5											
16741021			Above Moderate	3											
16741022			Above Moderate	3											
16741046			Above Moderate	5											
16741051			Above Moderate	5											
16741054			Above Moderate	2											
16741065			Moderate	4											
16741072			Above Moderate	4											
17028058			Above Moderate	1											
17038062			Above Moderate	3											
17039053			Above Moderate	3											
17039058			Above Moderate	5											
17040062			Moderate	8											
17040072			Moderate	5											
17041014			Moderate	6											
17041037			Above Moderate	4											
17041065			Above Moderate	4											
17041068			Above Moderate	5											
17514021			Above Moderate	1											
17516020			Above Moderate	1											
17516088			Above Moderate	1											
17041079			Lower	20											
17042028			Lower	18											
17040082			Lower	15											
17041086			Lower	12											
33609018	6085511702	1,000	Lower	20	Highest Resource	37.1%	8.6%	0	1	86.4%	4.8%	2.9%	0.0%	31.7%	41.1%
33609023			Lower	15											

Sub-Area 3	6085507805, 6085510001, 6085510002, 6085510100	5,037	Above Moderate/ Moderate/ Lower	519	Highest Resource	41.8%	13.2%	0	1	92.1%	5.9%	5.9%	3.8%	35.2%	39.3%
32601052	6085507805	501	Lower	57	Highest Resource	59.1%	29.3%	0	0	85.1%	10.7%	5.2%	12.3%	42.1%	43.5%
32601053			Lower	80											
18915106	6085510001	2,132	Lower	19	Highest Resource	40.3%	6.5%	0	1	96.4%	3.6%	5.8%	0.0%	0.0%	41.0%
18915026			Above Moderate	3											
18915038			Above Moderate	4											
18915041			Above Moderate	3											
18915042			Above Moderate	3											
18915059			Above Moderate	5											
18915063			Above Moderate	5											
18915088			Above Moderate	2											
18915090			Above Moderate	3											
18915103			Above Moderate	6											
18914081			Lower	37											
18916003			Moderate	8											
18916004			Moderate	7											
18916005			Moderate	6											
18916006			Moderate	6											
18916008			Moderate	6											
18916009			Moderate	7											
18916010			Moderate	8											
18916012			Moderate	7											
18916013			Moderate	7											
18916014			Moderate	7											
18916016			Moderate	7											
18916017			Moderate	6											
18916018			Moderate	7											
18918102			Above Moderate	1											
18919003			Above Moderate	1											
19341039			Above Moderate	1											
19344033			Above Moderate	1											
18915102			Moderate	7											
31816020	6085510002	1,290	Lower	14	Highest Resource	42.0%	10.5%	0	1	90.3%	6.2%	7.2%	0.0%	18.6%	31.4%
31816019			Lower	14											
31801036			Lower	43											
31816022			Lower	68											
31807008			Above Moderate	1											
31816008			Moderate	12											
31816009			Moderate	8											
31816011			Moderate	8											
31816015			Moderate	9											
34204078	6085510100	1,114	Above Moderate	1	Highest Resource	38.5%	4.8%	0	1	99.0%	1.0%	6.0%	2.5%	13.8%	39.5%
34204089			Above Moderate	10											
34205032			Above Moderate	1											
34209045			Above Moderate	1											
34210088			Above Moderate	1											
34224058			Above Moderate	1											

F.3.2 Potential Effects on Patterns of Segregation

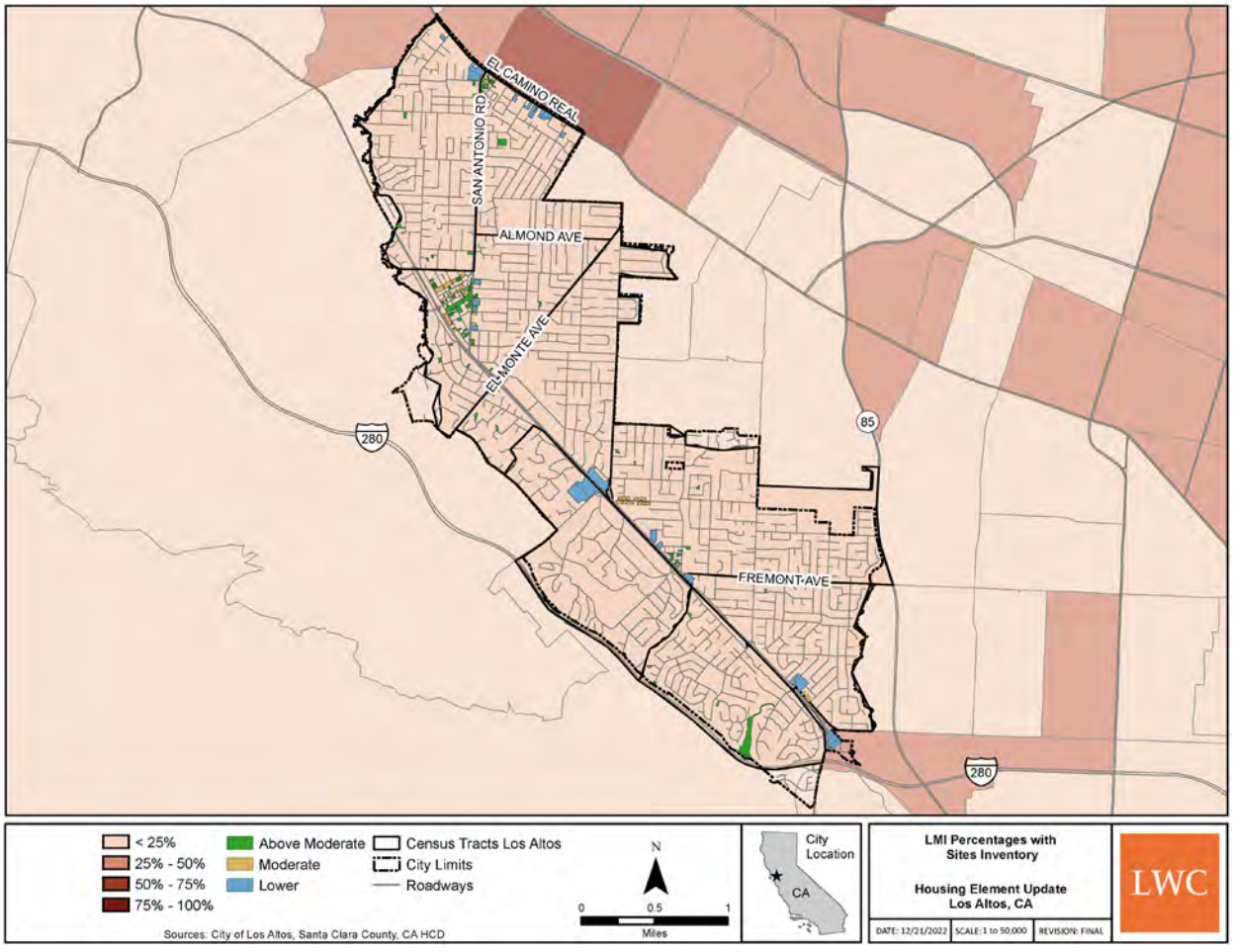
A comparison of a jurisdiction's site inventory against its LMI households and R/ECAP area can reveal if the city's accommodation of housing is exacerbating or ameliorating segregation and social inequity. Figure F-27 shows the locations of Los Altos' sites inventory relative to LMI concentrations, and Figure F-28 shows the distribution of sites area relative to the area of LMI concentrations.

The city contains two LMI percentage quartiles, less than 25 percent and 25 to 50 percent.

The city's lowest LMI percentage category of less than 25 percent covers almost all of the city. The amount city area within this area is 100 percent when rounded to the nearest whole percentage, and about 95 percent of the sites inventory area is in this category.

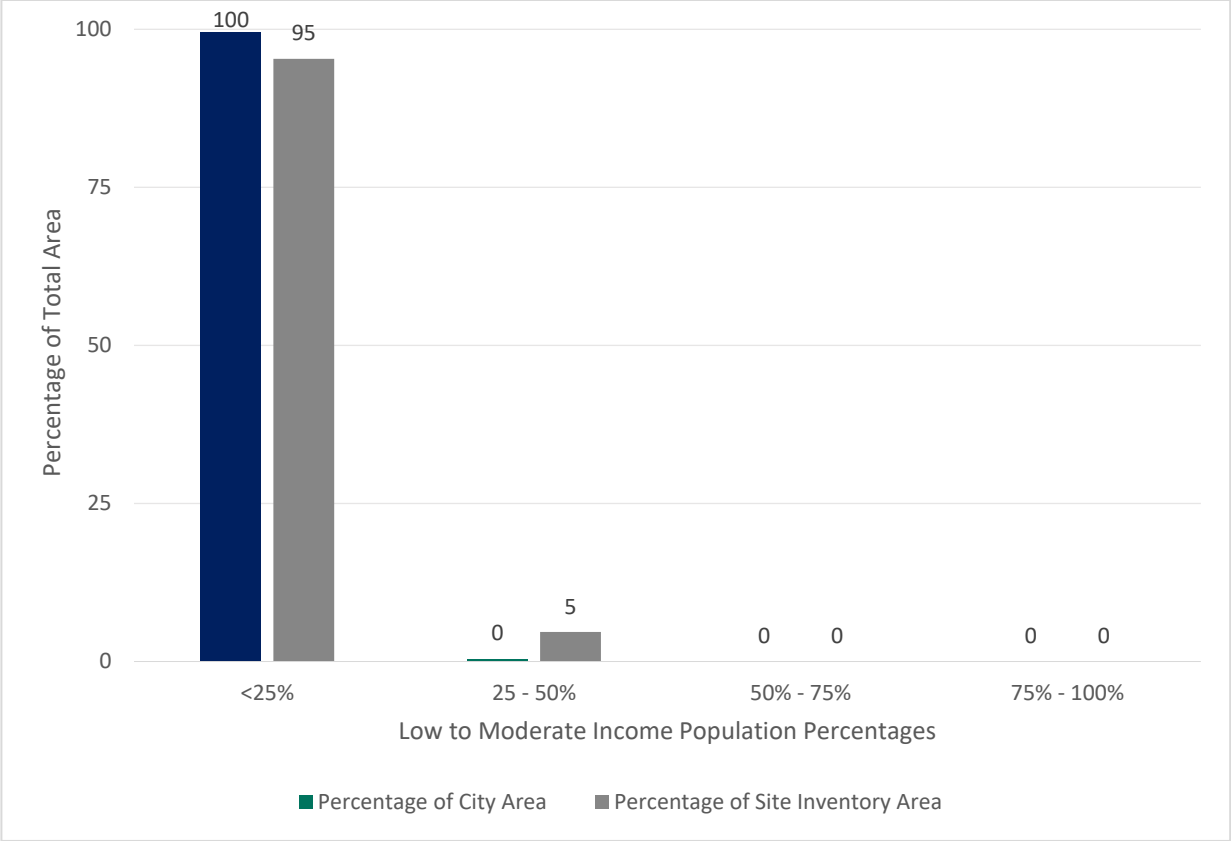
The other LMI category (25 to 50 percent) covers less than one percent of city area and is in the very southern portion of the city. This LMI category contains five percent of site inventory area.

Figure F-27: Site Inventory including Rezone Sites and LMI Households



Source: HCD AFFH Spatial Data and LWC

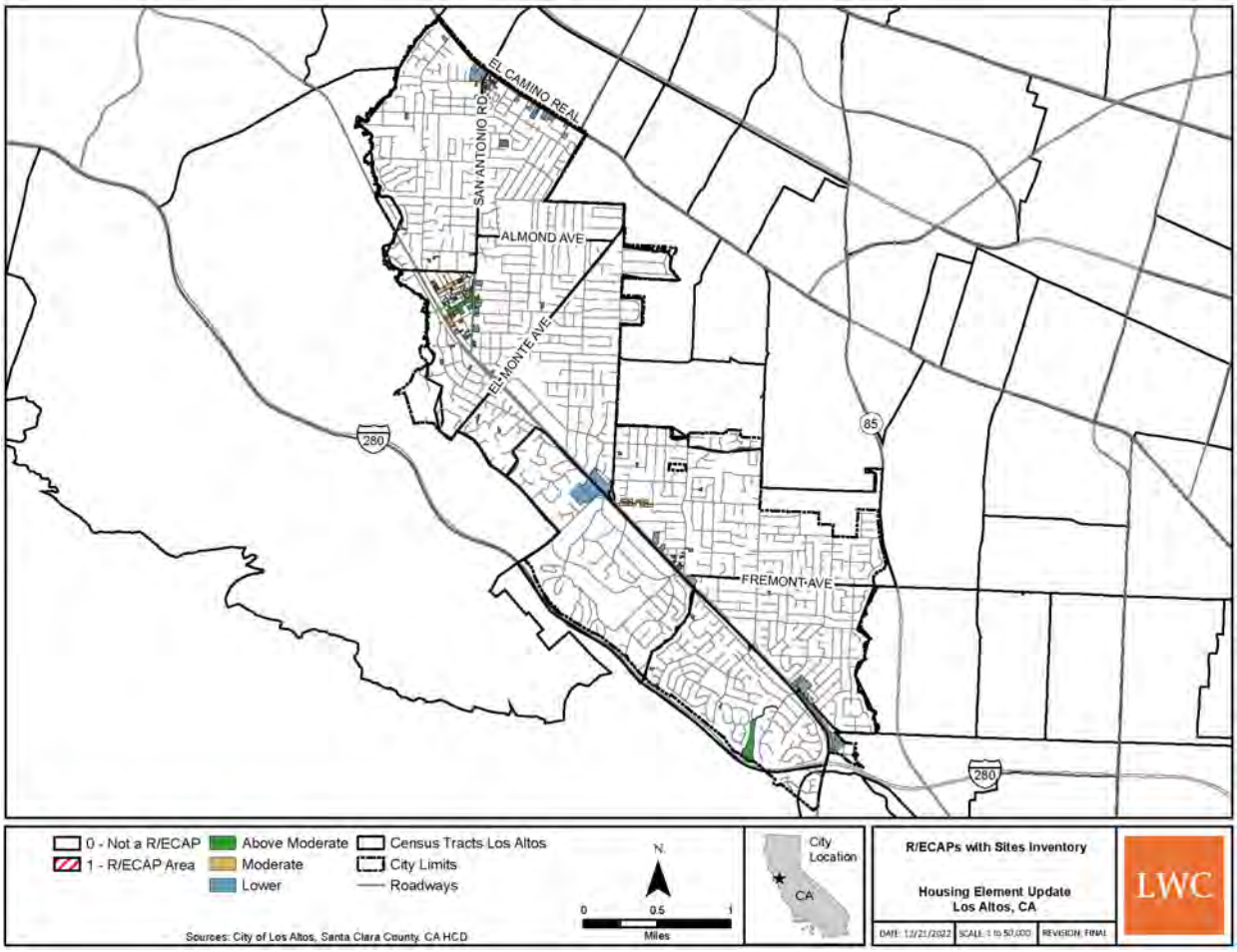
Figure F-28: Distribution of Site Inventory including Rezone Sites across LMI Population Percentages



Source: HCD AFFH Spatial Data and LWC

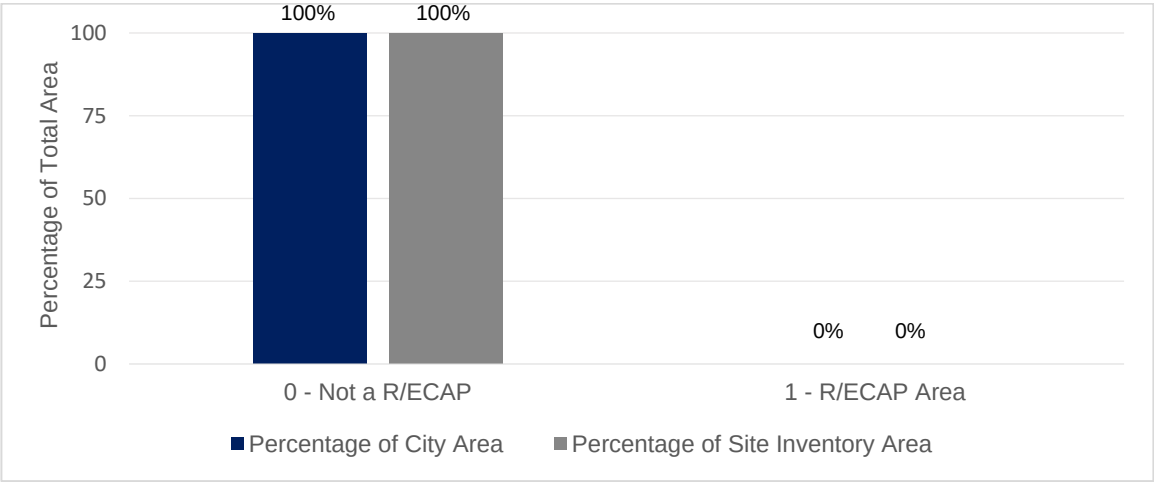
Figures F-29 and F-30 show the site inventory area associated with R/ECAPs. As previously noted, Los Altos does not have any R/ECAPs within its boundaries. The amount of city and site inventory areas not within a R/ECAP is therefore 100 percent.

Figure F-29: Site Inventory including Rezone Sites and R/ECAPs



Source: HCD AFFH Spatial Data and LWC

Figure F-30: Distribution of Site Inventory including Rezone Sites across R/ECAP

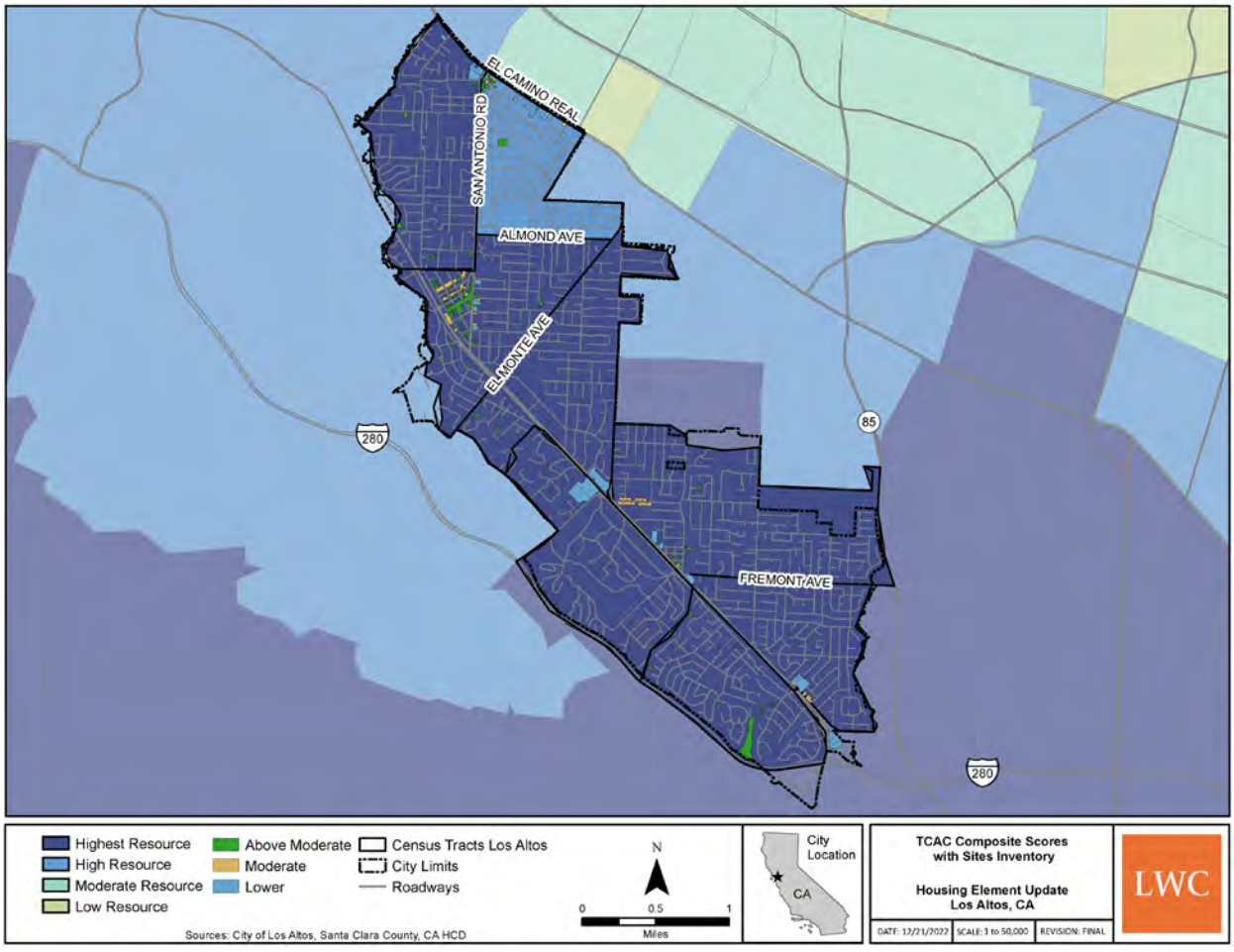


Source: HCD AFFH Spatial Data and LWC

F.3.3 Potential Effects on Access to Opportunity

Figure F-31 shows sites inventory locations across the city's TCAC Opportunity Areas. As mentioned earlier, the city is categorized as either highest or high resource areas based on the TCAC Composite Score. These areas have been scored based on very good access to high quality schools, economic opportunities, and low environmental risk.

Figure F-31: Site Inventory including Rezone Sites and TCAC Composite Scores

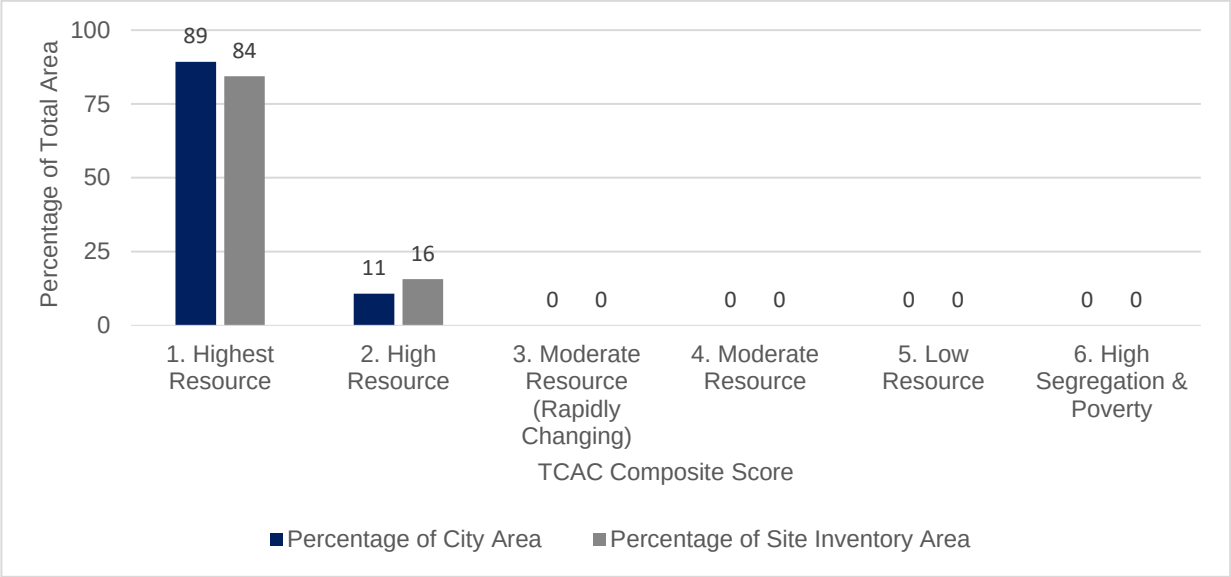


Source: HCD AFFH Spatial Data and LWC

Figure F-32 shows the distribution of Los Altos sites across the TCAC Opportunity Area Composite Score categories. The city is comprised of two categories: highest resource (89 percent of the city) and high resource (11 percent of the city). The sites inventory area distribution is aligned with the city's Opportunity Areas. In this respect, the sites inventory is considered to

mitigate fair housing concerns regarding access to opportunity because housing development potential in the city is equitably located in high resource neighborhoods overall.

Figure F-32: Distribution of Site Inventory including Rezone Sites across TCAC Opportunity Areas

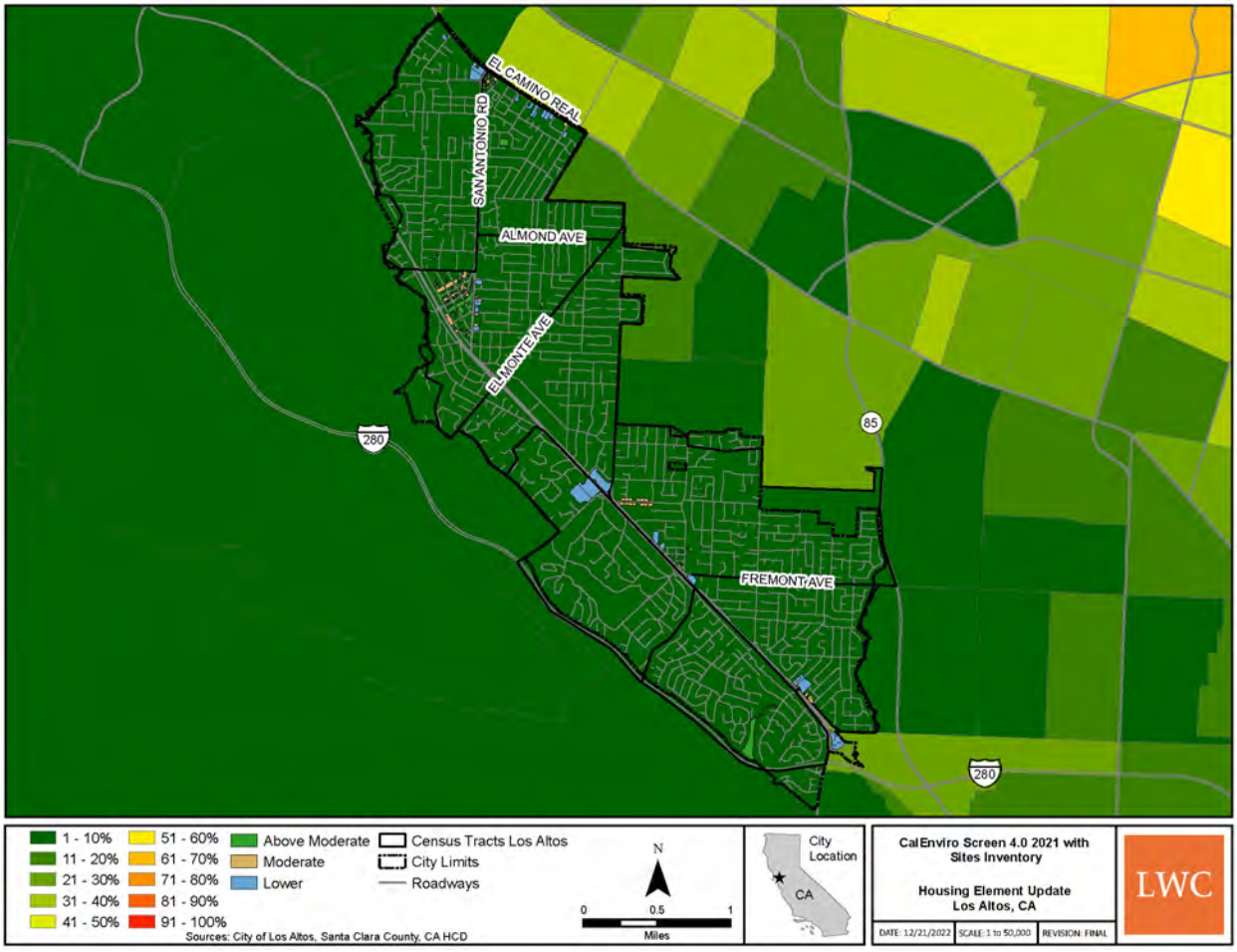


Source: HCD AFFH Spatial Data and LWC

Figure F-33 shows the sites inventory across the city's CalEnviroScreen scores. The city contains two CalEnviroScreen scores ranging from the lowest one to 10 percent (first decile, lowest risk) and 21 to 30 percent (third decile, lower risk).

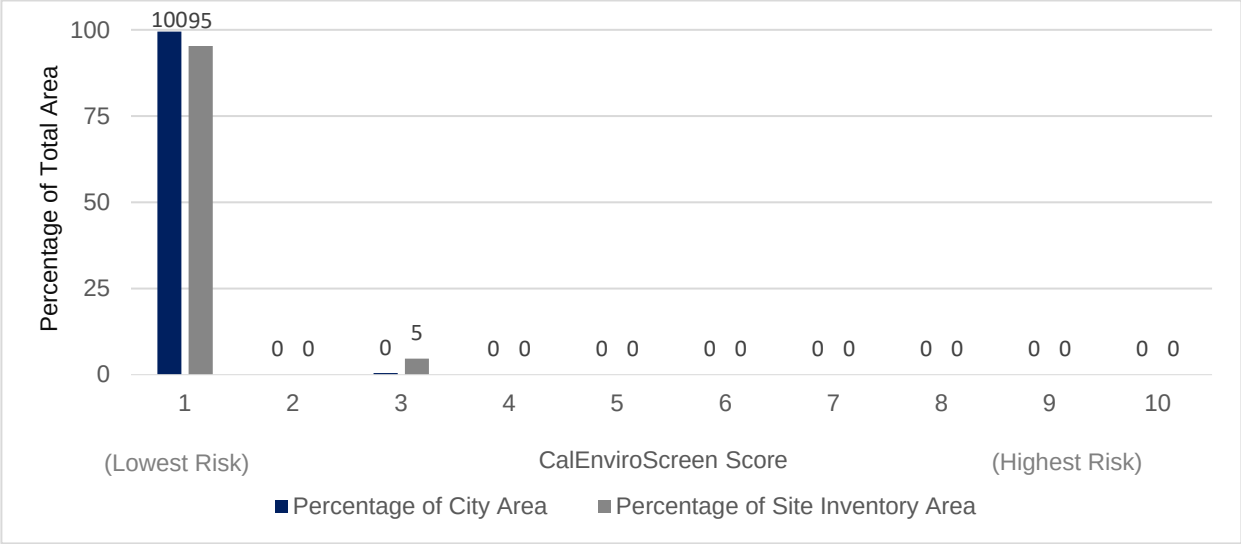
Figure F-34 shows the distribution of sites across the range of CalEnviroScreen scores presented as deciles in Los Altos. The city contains two decile scores: 1 and 3. The highest environmental risk to residents (score three) accounts for less than one percent of city area and makes up five percent of the sites inventory area.

Figure F-33: Site Inventory including Rezone Sites and CalEnviroScreen Scores



Source: HCD AFFH Spatial Data and LWC

Figure F-34: Distribution of Site Inventory including Rezone Sites across CalEnviroScreen Scores



Source: HCD AFFH Spatial Data and LWC

Note: CalEnviroScreen Score 3 represents less than 1% of total area within the city; therefore, is rounded to 0.

Section F.4 Contributing Factors and Meaningful Actions

Table F-12 lists the most prevalent fair housing issues and their corresponding contributing factors for the City of Los Altos, as prioritized through the findings from the City's outreach efforts and the above assessment, as outlined in Section F.2.8.

Table F-12: Contributing Factors

Priority	Contributing Factor	Fair Housing Issue
1	Land use and zoning laws	Disproportionate Housing Needs
2	Availability of affordable units in a range of sizes	Disproportionate Housing Needs
3	Community opposition	Segregation and Integration
4	Location and type of affordable housing	Segregation and Integration

Table F-13 consists of proposed housing programs the City will pursue to specifically overcome identified patterns and trends from the above assessment and proactively affirmatively further fair housing in Los Altos. The programs are detailed metrics and milestones in Section IV of the Housing Element.

Table F-13: Meaningful Actions

Contributing Factor	AFFH Strategy	Housing Implementation Programs
Land use and zoning laws	New housing choices and affordability in areas of opportunity	1.A: Rezone for RHNA shortfall 1.C: Allow housing in the Office Administrative (OA) District 1.E: Update the Loyola Corners Specific Plan
Availability of affordable units in a range of sizes	New housing choices and affordability in areas of opportunity	1.B: Facilitate higher density housing in the Commercial Thoroughfare (CT) District 1.H Facilitate housing on City-owned sites 2.D: Encourage and streamline Accessory Dwelling Units (ADUs) 6.A: Assist residents with housing discrimination and landlord-tenant complaints
Community opposition	New housing choices and affordability in areas of opportunity	2.A: Continue to implement and enhance inclusionary housing requirements 3.F: Reduce Conditional Use Permit requirement for residential mixed-use and multi-family 3.H: Amend design review process and requirements 3.K: Standardize multimodal transportation requirements
Location and type of affordable housing	New housing choices and affordability in areas of opportunity	1.D: Allow housing on certain Public and Community Facility District sites and facilitate housing on religious institution properties 6.B: Maintain and expand an inventory of affordable housing funding sources 6.C: Target housing development in highest resource areas 6.F: Affirmatively market physically accessible units
	Protect existing residents from displacement	5.A: Monitor condominium conversions 6.E: Prepare and distribute anti-displacement information
	Housing mobility strategies	4.J: Facilitate alternate modes of transportation for residents 5.B: Continue to administer the City's affordable housing programs 6.D: Promote Housing Choice (Section 8) rental assistance program

Attachment: AFFH Segregation Report, Los Altos

AFFH SEGREGATION REPORT: LOS ALTOS

UC Merced Urban Policy Lab and ABAG/MTC Staff

Version of Record: March 06, 15:57:45

0.1 Table of content

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0.3 List of tables

1 INTRODUCTION

The requirement to Affirmatively Further Fair Housing (AFFH) is derived from The Fair Housing Act of 1968, which prohibited discrimination concerning the sale, rental, and financing of housing based on race, color, religion, national origin, or sex—and was later amended to include familial status and disability.[1] The 2015 U.S. Department of Housing and Urban Development (HUD) Rule to Affirmatively Further Fair Housing and California Assembly Bill 686 (2018) mandate that each jurisdiction takes meaningful action to address significant disparities in housing needs and access to opportunity.[2][3] AB 686 requires that jurisdictions incorporate AFFH into their Housing Elements, which includes inclusive community participation, an assessment of fair housing, a site inventory reflective of AFFH, and the development of goals, policies, and programs to meaningfully address local fair housing issues. ABAG and UC Merced have prepared this report to assist Bay Area jurisdictions with the Assessment of Fair Housing section of the Housing Element.

Assessment of Fair Housing Components

The Assessment of Fair Housing includes five components, which are discussed in detail on pages 22-43 of HCD's AFFH Guidance Memo:

A: Summary of fair housing enforcement and outreach capacity

B: Integration and segregation patterns, and trends related to people with protected characteristics

C: Racially or ethnically concentrated areas of poverty

D: Disparities in access to opportunity

E: Disproportionate housing needs, including displacement risk

1.1 Purpose of this Report

This report describes racial and income segregation in Bay Area jurisdictions. Local jurisdiction staff can use the information in this report to help fulfill a portion of the second component of the Assessment of Fair Housing, which requires analysis of integration and segregation patterns and trends related to people with protected characteristics and lower incomes. Jurisdictions will still need to perform a similar analysis for familial status and populations with disability.

This report provides segregation measures for both the local jurisdiction and the region using several indices. For segregation between neighborhoods within a city (intra-city segregation), this report includes isolation indices, dissimilarity indices, and Theil's-H index. The isolation index measures

[1] https://www.justice.gov/crt/fair-housing-act-2
[2] HCD AFFH Guidance Memo
[3] The 2015 HUD rule was reversed in 2020 and partially reinstated in 2021.

segregation for a single group, while the dissimilarity index measures segregation between two groups. The Theil's H-Index can be used to measure segregation between all racial or income groups across the city at once. HCD's AFFH guidelines require local jurisdictions to include isolation indices and dissimilarity indices in the Housing Element. Theil's H index is provided in addition to these required measures. For segregation between cities within the Bay Area (inter-city segregation), this report includes dissimilarity indices at the regional level as required by HCD's AFFH guidelines. HCD's AFFH guidelines also require jurisdictions to compare conditions at the local level to the rest of the region; and this report presents the difference in the racial and income composition of a jurisdiction relative to the region as a whole to satisfy the comparison requirement.

1.2 Defining Segregation

Segregation is the separation of different demographic groups into different geographic locations or communities, meaning that groups are unevenly distributed across geographic space. This report examines two spatial forms of segregation: neighborhood level segregation *within* a local jurisdiction and city level segregation *between* jurisdictions in the Bay Area.

Neighborhood level segregation (*within* a jurisdiction, or *intra-city*): Segregation of race and income groups can occur from neighborhood to neighborhood *within* a city. For example, if a local jurisdiction has a population that is 20% Latinx, but some neighborhoods are 80% Latinx while others have nearly no Latinx residents, that jurisdiction would have segregated neighborhoods.

City level segregation (*between* jurisdictions in a region, or *inter-city*): Race and income divides also occur *between* jurisdictions in a region. A region could be very diverse with equal numbers of white, Asian, Black, and Latinx residents, but the region could also be highly segregated with each city comprised solely of one racial group.

There are many factors that have contributed to the generation and maintenance of segregation. Historically, racial segregation stemmed from explicit discrimination against people of color, such as restrictive covenants, redlining, and discrimination in mortgage lending. This history includes many overtly discriminatory policies made by federal, state, and local governments (Rothstein 2017). Segregation patterns are also affected by policies that appear race-neutral, such as land use decisions and the regulation of housing development.

Segregation has resulted in vastly unequal access to public goods such as quality schools, neighborhood services and amenities, parks and playgrounds, clean air and water, and public safety (Trounstine 2015). This generational lack of access for many communities, particularly people of color and lower income residents, has often resulted in poor life outcomes, including lower educational attainment, higher morbidity rates, and higher mortality rates (Chetty and Hendren 2018, Ananat 2011, Burch 2014, Cutler and Glaeser 1997, Sampson 2012, Sharkey 2013).

1.3 Segregation Patterns in the Bay Area

Across the San Francisco Bay Area, white residents and above moderate-income residents are significantly more segregated from other racial and income groups (see Appendix 2). The highest levels of racial segregation occur between the Black and white populations. The analysis completed for this report indicates that the amount of racial segregation both *within* Bay Area cities and *across* jurisdictions in the region has decreased since the year 2000. This finding is consistent with recent research from the Othering and Belonging Institute at UC Berkeley, which concluded that "[a]lthough 7

of the 9 Bay Area counties were more segregated in 2020 than they were in either 1980 or 1990, racial residential segregation in the region appears to have peaked around the year 2000 and has generally declined since."[4] However, compared to cities in other parts of California, Bay Area jurisdictions have more neighborhood level segregation between residents from different racial groups. Additionally, there is also more racial segregation *between* Bay Area cities compared to other regions in the state.

1.4 Segregation and Land Use

It is difficult to address segregation patterns without an analysis of both historical and existing land use policies that impact segregation patterns. Land use regulations influence what kind of housing is built in a city or neighborhood (Lens and Monkkonen 2016, Pendall 2000). These land use regulations in turn impact demographics: they can be used to affect the number of houses in a community, the number of people who live in the community, the wealth of the people who live in the community, and where within the community they reside (Trounstine 2018). Given disparities in wealth by race and ethnicity, the ability to afford housing in different neighborhoods, as influenced by land use regulations, is highly differentiated across racial and ethnic groups (Bayer, McMillan, and Reuben 2004).[5] ABAG/MTC plans to issue a separate report detailing the existing land use policies that influence segregation patterns in the Bay Area.

[4] For more information, see https://belonging.berkeley.edu/most-segregated-cities-bay-area-2020.
[5] Using a household-weighted median of Bay Area county median household incomes, regional values were $61,050 for Black residents, $122,174 for Asian/Pacific Islander residents, $121,794 for white residents, and $76,306 for Latinx residents. For the source data, see U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B19013B, Table B19013D, B19013H, and B19013I.

Definition of Terms - Geographies

Neighborhood: In this report, "neighborhoods" are approximated by tracts.[6] Tracts are statistical geographic units defined by the U.S. Census Bureau for the purposes of disseminating data. In the Bay Area, tracts contain on average 4,500 residents. Nearly all Bay Area jurisdictions contain at least two census tracts, with larger jurisdictions containing dozens of tracts.

Jurisdiction: Jurisdiction is used to refer to the 109 cities, towns, and unincorporated county areas that are members of ABAG. Though not all ABAG jurisdictions are cities, this report also uses the term "city" interchangeably with "jurisdiction" in some places.

Region: The region is the nine-county San Francisco Bay Area, which is comprised of Alameda County, Contra Costa County, Marin County, Napa County, San Francisco County, San Mateo County, Santa Clara County, Solano County, and Sonoma County.

[6] Throughout this report, neighborhood level segregation measures are calculated using census tract data. However, the racial dot maps in Figure 1 and Figure 5 use data from census blocks, while the income group dot maps in Figure 8 and Figure 12 use data from census block groups. These maps use data derived from a smaller geographic scale to better show spatial differences in where different groups live. Census block groups are subdivisions of census tracts, and census blocks are subdivisions of block groups. In the Bay Area, block groups contain on average 1,500 people, while census blocks contain on average 95 people.

2 RACIAL SEGREGATION IN CITY OF LOS ALTOS

Definition of Terms - Racial/Ethnic Groups

The U.S. Census Bureau classifies racial groups (e.g. white or Black/African American) separately from Hispanic/Latino ethnicity.[7] This report combines U.S. Census Bureau definitions for race and ethnicity into the following racial groups:

White: Non-Hispanic white

Latinx: Hispanic or Latino of any race[8]

Black: Non-Hispanic Black/African American

Asian/Pacific Islander: Non-Hispanic Asian or Non-Hispanic Pacific Islander

People of Color: All who are not non-Hispanic white (including people who identify as "some other race" or "two or more races")[9]

2.1 Neighborhood Level Racial Segregation (*within* City of Los Altos)

Racial dot maps are useful for visualizing how multiple racial groups are distributed within a specific geography. The racial dot map of Los Altos in Figure 1 below offers a visual representation of the spatial distribution of racial groups within the jurisdiction. Generally, when the distribution of dots does not suggest patterns or clustering, segregation measures tend to be lower. Conversely, when clusters of certain groups are apparent on a racial dot map, segregation measures may be higher.

[7] More information about the Census Bureau's definitions of racial groups is available here: https://www.census.gov/topics/population/race/about.html.
[8] The term Hispanic has historically been used to describe people from numerous Central American, South American, and Caribbean countries. In recent years, the term Latino or Latinx has become preferred. This report generally uses Latinx to refer to this racial/ethnic group.
[9] Given the uncertainty in the data for population size estimates for racial and ethnic groups not included in the Latinx, Black, or Asian/Pacific Islander categories, this report only analyzes these racial groups in the aggregate People of Color category.

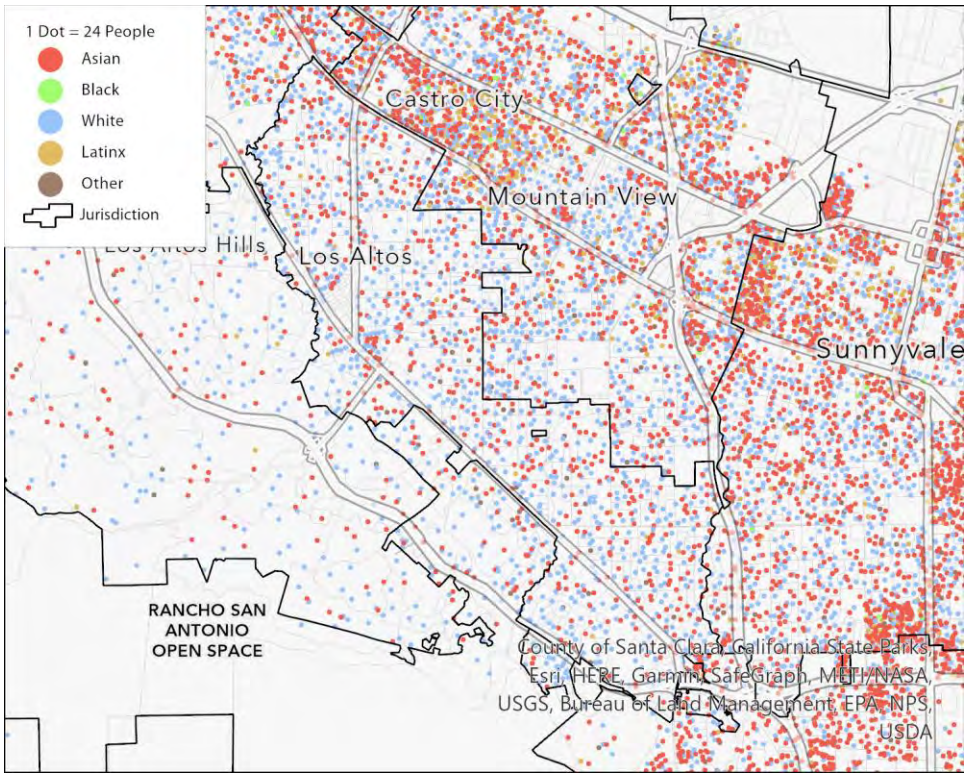

Figure 1: Racial Dot Map of Los Altos (2020)

Universe: Population. Source: U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.
Note: The plot shows the racial distribution at the census block level for City of Los Altos and vicinity. Dots in each census block are randomly placed and should not be construed as actual placement of people.

There are many ways to quantitatively measure segregation. Each measure captures a different aspect of the ways in which groups are divided within a community. One way to measure segregation is by using an isolation index:

- The isolation index compares each neighborhood's composition to the jurisdiction's demographics as a whole.
- This index ranges from 0 to 1. Higher values indicate that a particular group is more isolated from other groups.
- Isolation indices indicate the potential for contact between different groups. The index can be interpreted as the experience of the average member of that group. For example, if the isolation index is .65 for Latinx residents in a city, then the average Latinx resident in that city lives in a neighborhood that is 65% Latinx.

Within City of Los Altos the most isolated racial group is white residents. Los Altos's isolation index of 0.530 for white residents means that the average white resident lives in a neighborhood that is 53.0% white. Other racial groups are less isolated, meaning they may be more likely to encounter other racial groups in their neighborhoods. The isolation index values for all racial groups in Los Altos for the years 2000, 2010, and 2020 can be found in Table 1 below. Among all racial groups in this jurisdiction, the white population's isolation index has changed the most over time, becoming less segregated from other racial groups between 2000 and 2020.

The "Bay Area Average" column in this table provides the average isolation index value across Bay Area jurisdictions for different racial groups in 2020.[10] The data in this column can be used as a comparison to provide context for the levels of segregation experienced by racial groups in this jurisdiction. For example, Table 1 indicates the average isolation index value for white residents across all Bay Area jurisdictions is 0.491, meaning that in the average Bay Area jurisdiction a white resident lives in a neighborhood that is 49.1% white.

Table 1: Racial Isolation Index Values for Segregation within Los Altos

	Los Altos			Bay Area Average
Race	**2000**	**2010**	**2020**	**2020**
Asian/Pacific Islander	0.167	0.247	0.358	0.245
Black/African American	0.005	0.005	0.008	0.053
Latinx	0.034	0.042	0.053	0.251
White	0.784	0.682	0.530	0.491

Universe: Population.
Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Figure 2 below shows how racial isolation index values in Los Altos compare to values in other Bay Area jurisdictions. In this chart, each dot represents a Bay Area jurisdiction. For each racial group, the spread of dots represents the range of isolation index values among Bay Area jurisdictions. Additionally, the black line within each racial group notes the isolation index value for that group in City of Los Altos, and each dashed red line represents the Bay Area average for the isolation index for that group. Local staff can use this chart to contextualize how segregation levels for racial groups in their jurisdiction compare to other jurisdictions in the region.

[10] This average only includes the 104 jurisdictions that have more than one census tract, which is true for all comparisons of Bay Area jurisdictions' segregation measures in this report. The segregation measures in this report are calculated by comparing the demographics of a jurisdiction's census tracts to the jurisdiction's demographics, and such calculations cannot be made for the five jurisdictions with only one census tract (Brisbane, Calistoga, Portola Valley, Rio Vista, and Yountville).

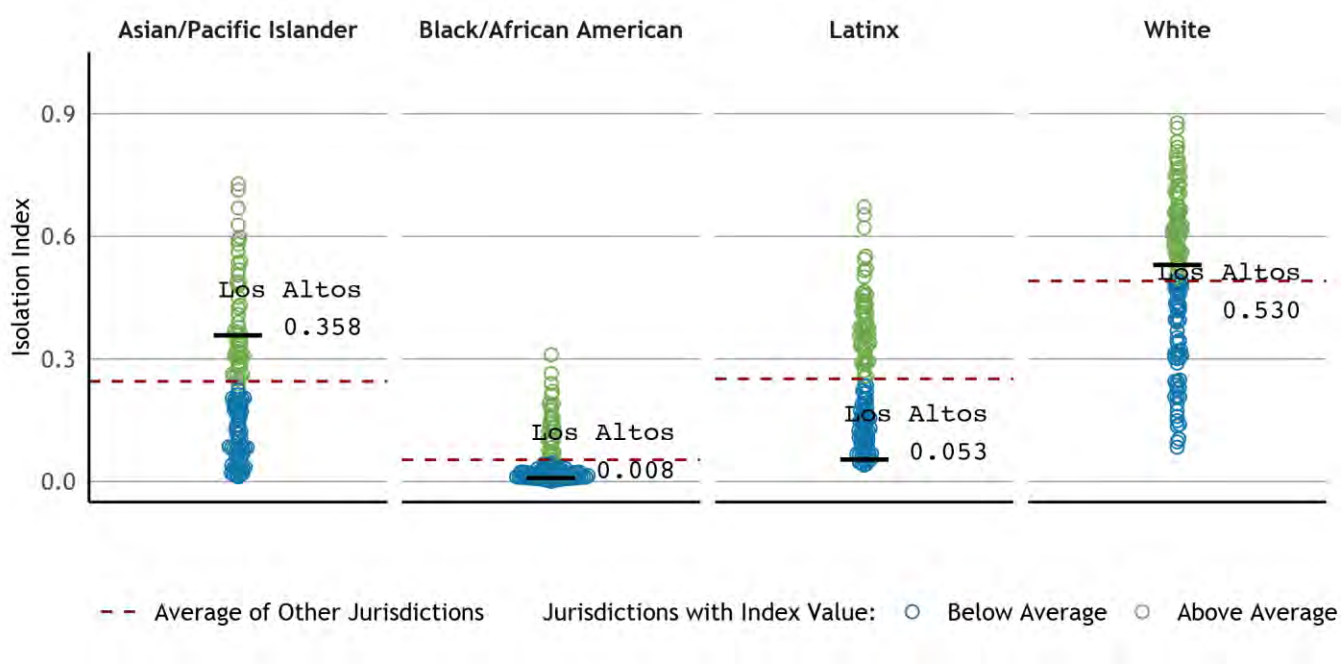

Figure 2: Racial Isolation Index Values for Los Altos Compared to Other Bay Area Jurisdictions (2020)

Universe: Bay Area Jurisdictions.
Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

Another way to measure segregation is by using a dissimilarity index:

- This index measures how evenly any two groups are distributed across neighborhoods relative to their representation in a city overall. The dissimilarity index at the jurisdiction level can be interpreted as the share of one group that would have to move neighborhoods to create perfect integration for these two groups.
- The dissimilarity index ranges from 0 to 1. Higher values indicate that groups are more unevenly distributed (e.g. they tend to live in different neighborhoods).

Dissimilarity Index Guidance for Cities with Small Racial Group Populations

The analysis conducted for this report suggests that dissimilarity index values are unreliable for a population group if that group represents approximately less than 5% of the jurisdiction's total population.

HCD's AFFH guidance requires the Housing Element to include the dissimilarity index values for racial groups, but also offers flexibility in emphasizing the importance of various measures. ABAG/MTC recommends that when cities have population groups that are less than 5% of the jurisdiction's population (see Table 4), jurisdiction staff use the isolation index or Thiel's H-Index to gain a more accurate understanding of their jurisdiction's neighborhood-level segregation patterns (*intra*-city segregation).

If a jurisdiction has a very small population of a racial group, this indicates that segregation between the jurisdiction and the region (*inter*-city segregation) is likely to be an important feature of the jurisdiction's segregation patterns.

In City of Los Altos, the Latinx group is 4.9 percent of the population, and the Black/African American group is 0.6 percent of the population - so staff should be aware of this small population size when evaluating dissimilarity index values involving these groups.

Table 2 below provides the dissimilarity index values indicating the level of segregation in Los Altos between white residents and residents who are Black, Latinx, or Asian/Pacific Islander. The table also provides the dissimilarity index between white residents and all residents of color in the jurisdiction, and all dissimilarity index values are shown across three time periods (2000, 2010, and 2020).

In Los Altos the highest segregation is between Black and white residents (see Table 2). Los Altos's Black /white dissimilarity index of 0.124 means that 12.4% of Black (or white) residents would need to move to a different neighborhood to create perfect integration between Black residents and white residents. However, local jurisdiction staff should note that this dissimilarity index value is not a reliable data point due to small population size. See callout box above for more information.

The "Bay Area Average" column in this table provides the average dissimilarity index values for these racial group pairings across Bay Area jurisdictions in 2020. The data in this column can be used as a comparison to provide context for the levels of segregation between communities of color are from white residents in this jurisdiction.

For example, Table 2 indicates that the average Latinx/white dissimilarity index for a Bay Area jurisdiction is 0.207, so on average 20.7% of Latinx (or white residents) in a Bay Area jurisdiction would need to move to a different neighborhood within the jurisdiction to create perfect integration between Latinx and white residents in that jurisdiction.

Table 2: Racial Dissimilarity Index Values for Segregation within Los Altos

	Los Altos			Bay Area Average
Race	**2000**	**2010**	**2020**	**2020**
Asian/Pacific Islander vs. White	0.126	0.086	0.068	0.185
Black/African American vs. White	0.177*	0.144*	0.124*	0.244
Latinx vs. White	0.138*	0.120*	0.089*	0.207
People of Color vs. White	0.113	0.080	0.064	0.168

Universe: Population.
Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.
Note: If a number is marked with an asterisk (*), it indicates that the index is based on a racial group making up less than 5 percent of the jurisdiction population, leading to unreliable numbers.

Figure 3 below shows how dissimilarity index values in City of Los Altos compare to values in other Bay Area jurisdictions. In this chart, each dot represents a Bay Area jurisdiction. For each racial group pairing, the spread of dots represents the range of dissimilarity index values among Bay Area jurisdictions. Additionally, the black line within each racial group pairing notes the dissimilarity index value in Los Altos, and each dashed red line represents the Bay Area average for the dissimilarity index for that pairing. Similar to Figure 2, local staff can use this chart to contextualize how segregation levels between white residents and communities of color in their jurisdiction compare to the rest of the region. However, staff should be mindful of whether a racial group in their jurisdiction has a small population (approximately less than 5% of the jurisdiction's population), as the dissimilarity index value is less reliable for small populations.

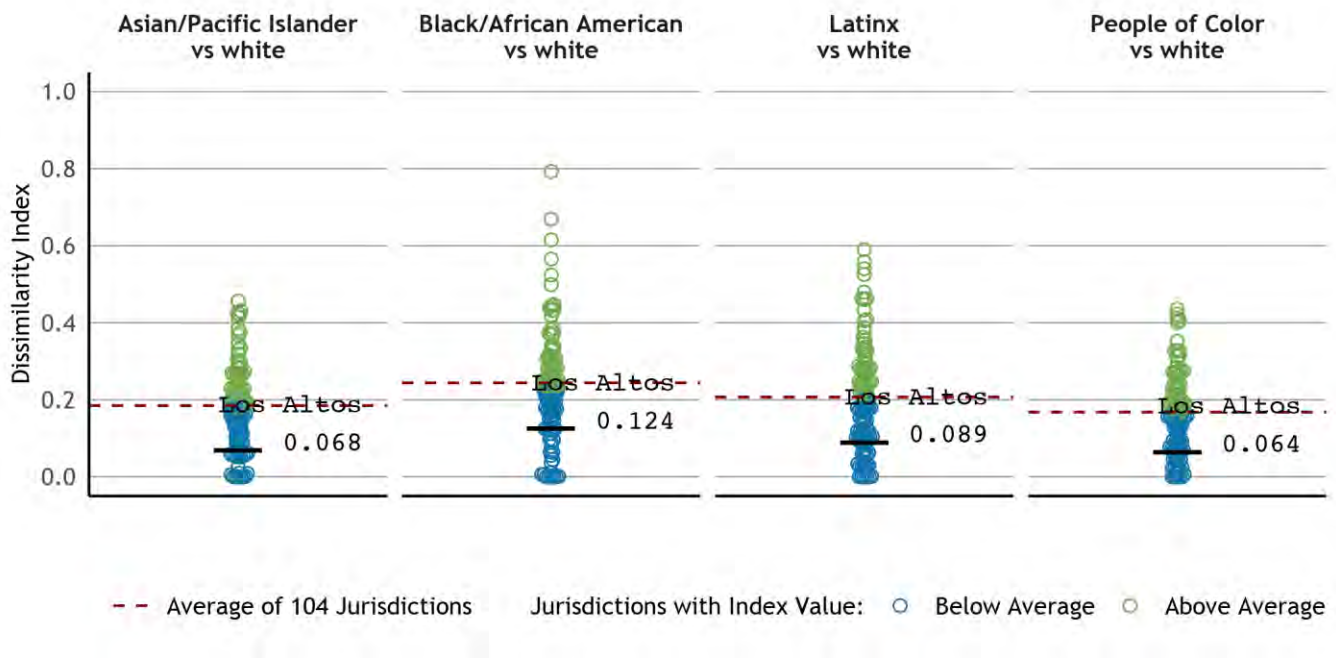

Figure 3: Racial Dissimilarity Index Values for Los Altos Compared to Other Bay Area Jurisdictions (2020)

Universe: Bay Area Jurisdictions.
Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.
Note: The analysis conducted for this report suggests that dissimilarity index values are unreliable for a population group if that group represents approximately less than 5% of the jurisdiction's total population. ABAG/MTC recommends that when cities have population groups that are less than 5% of the jurisdiction's population (see Table 4), jurisdiction staff could focus on the isolation index or Thiel's H-Index to gain a more accurate understanding of neighborhood-level racial segregation in their jurisdiction.

The **Theil's H Index** can be used to measure segregation between all groups within a jurisdiction:

- This index measures how diverse each neighborhood is compared to the diversity of the whole city. Neighborhoods are weighted by their size, so that larger neighborhoods play a more significant role in determining the total measure of segregation.
- The index ranges from 0 to 1. A Theil's H Index value of 0 would mean all neighborhoods within a city have the same demographics as the whole city. A value of 1 would mean each group lives exclusively in their own, separate neighborhood.
- For jurisdictions with a high degree of diversity (multiple racial groups comprise more than 10% of the population), Theil's H offers the clearest summary of overall segregation.

The Theil's H Index values for neighborhood racial segregation in Los Altos for the years 2000, 2010, and 2020 can be found in Table 3 below. The "Bay Area Average" column in the table provides the average Theil's H Index across Bay Area jurisdictions in 2020. Between 2010 and 2020, the Theil's H Index for racial segregation in Los Altos declined, suggesting that there is now less neighborhood level racial segregation within the jurisdiction. In 2020, the Theil's H Index for racial segregation in Los Altos

was lower than the average value for Bay Area jurisdictions, indicating that neighborhood level racial segregation in Los Altos is less than in the average Bay Area city.

Table 3: Theil's H Index Values for Racial Segregation within Los Altos

	Los Altos			Bay Area Average
Index	**2000**	**2010**	**2020**	**2020**
Theil's H Multi-racial	0.012	0.009	0.006	0.042

Universe: Population.
Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Figure 4 below shows how Theil's H index values for racial segregation in Los Altos compare to values in other Bay Area jurisdictions in 2020. In this chart, each dot represents a Bay Area jurisdiction. Additionally, the black line notes the Theil's H index value for neighborhood racial segregation in Los Altos, and the dashed red line represents the average Theil's H index value across Bay Area jurisdictions. Local staff can use this chart to compare how neighborhood racial segregation levels in their jurisdiction compare to other jurisdictions in the region.

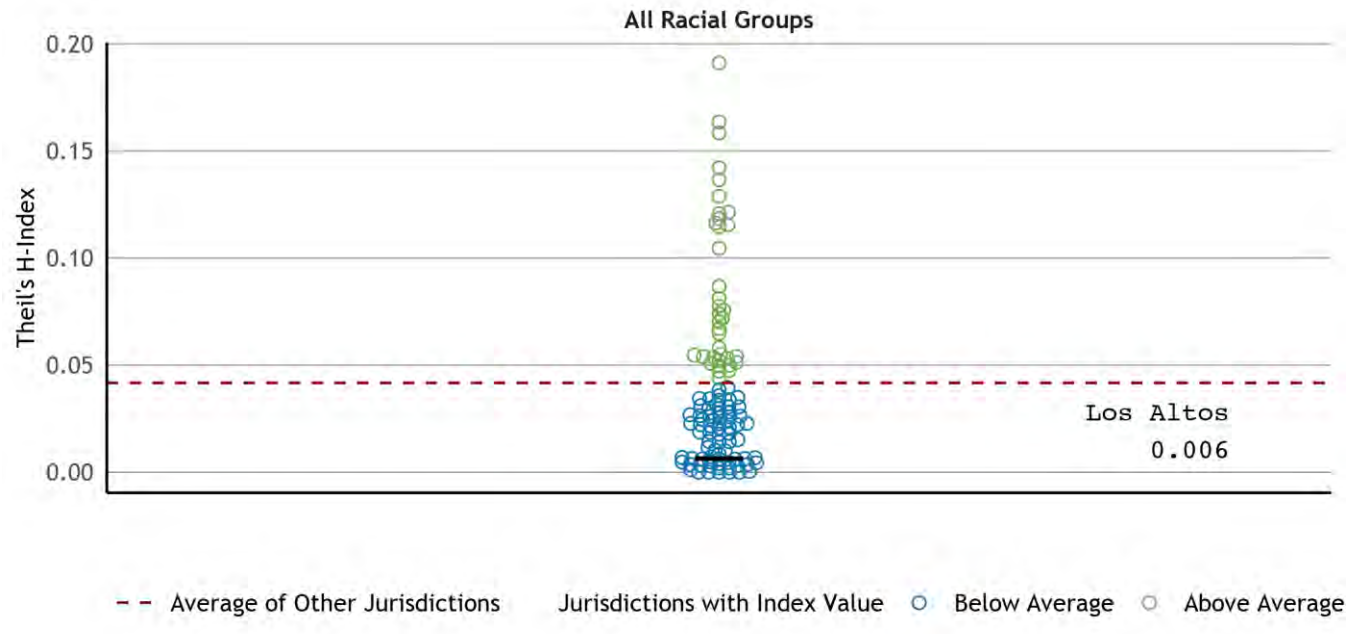

Figure 4: Theil's H Index Values for Racial Segregation in Los Altos Compared to Other Bay Area Jurisdictions (2020)

Universe: Bay Area Jurisdictions.
Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

2.2 Regional Racial Segregation (*between* Los Altos and other jurisdictions)

At the regional level, segregation is measured between *cities* instead of between *neighborhoods*. Racial dot maps are not only useful for examining neighborhood racial segregation within a jurisdiction, but these maps can also be used to explore the racial demographic differences between different jurisdictions in the region. Figure 5 below presents a racial dot map showing the spatial distribution of racial groups in Los Altos as well as in nearby Bay Area cities.

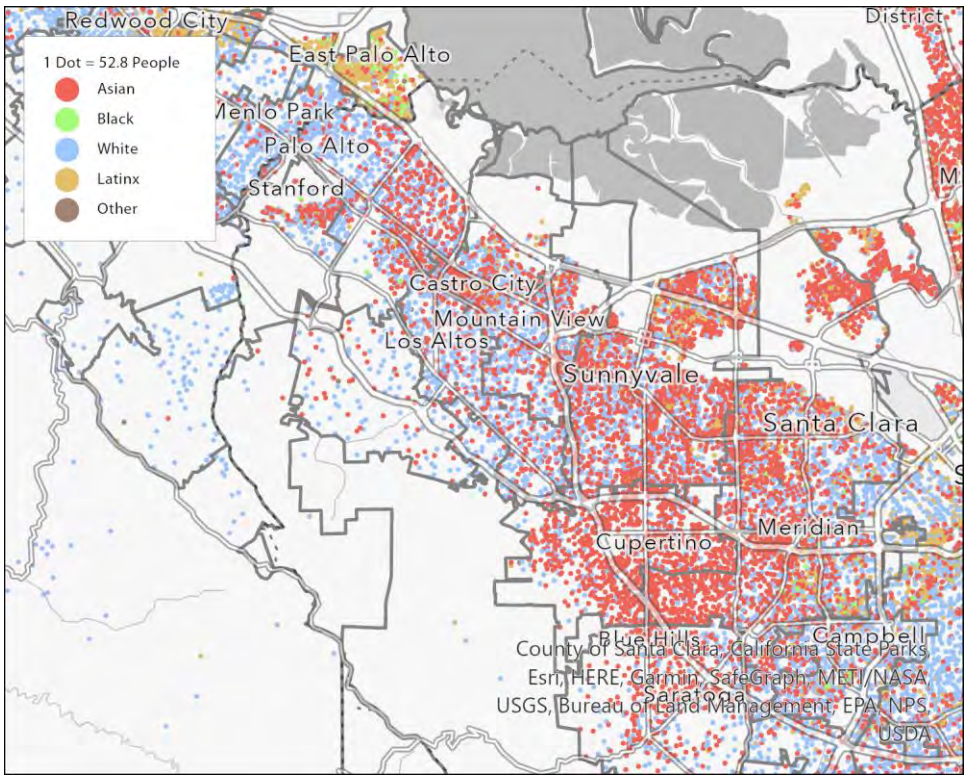

Figure 5: Racial Dot Map of Los Altos and Surrounding Areas (2020)

Universe: Population.
Source: U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.
Note: The plot shows the racial distribution at the census block level for City of Los Altos and vicinity. Dots in each census block are randomly placed and should not be construed as actual placement of people.

To understand how each city contributes to the total segregation of the Bay Area, one can look at the difference in the racial composition of a jurisdiction compared to the racial composition of the region as a whole. The racial demographics in Los Altos for the years 2000, 2010, and 2020 can be found in Table 4 below. The table also provides the racial composition of the nine-county Bay Area. As of 2020, Los Altos has a higher share of white residents than the Bay Area as a whole, a lower share of Latinx residents, a lower share of Black residents, and a higher share of Asian/Pacific Islander residents.

Table 4: Population by Racial Group, Los Altos and the Region

	Los Altos			Bay Area
Race	**2000**	**2010**	**2020**	**2020**
Asian/Pacific Islander	15.4%	23.6%	35.4%	28.2%
Black/African American	0.5%	0.5%	0.6%	5.6%
Latinx	3.0%	3.9%	4.9%	24.4%
Other or Multiple Races	3.0%	4.2%	6.6%	5.9%
White	78.2%	67.8%	52.6%	35.8%

Universe: Population.
Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Figure 6 below compares the racial demographics in Los Altos to those of all 109 Bay Area jurisdictions.[11] In this chart, each dot represents a Bay Area jurisdiction. For each racial group, the spread of dots represents the range of that group's representation among Bay Area jurisdictions. Additionally, the black line within each racial group notes the percentage of the population of City of Los Altos represented by that group and how that percentage ranks among all 109 jurisdictions. Local staff can use this chart to compare the representation of different racial groups in their jurisdiction to those groups' representation in other jurisdictions in the region, which can indicate the extent of segregation between this jurisdiction and the region.

[11] While comparisons of segregation measures are made only using the 104 jurisdictions with more than one census tract, this comparison of jurisdiction level demographic data can be made using all 109 jurisdictions.

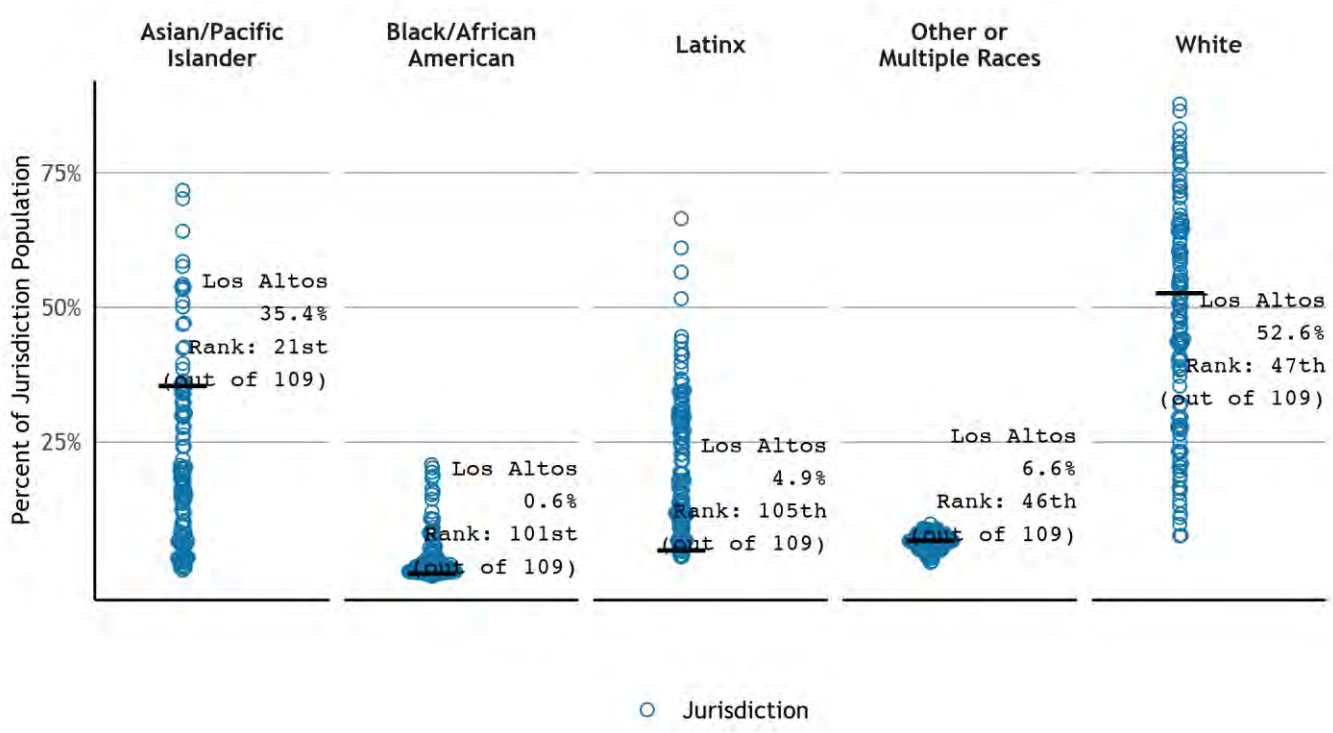

Figure 6: Racial Demographics of Los Altos Compared to All Bay Area Jurisdictions (2020)

Universe: Bay Area Jurisdictions.
Source U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

The map in Figure 7 below also illustrates regional racial segregation between Los Altos and other jurisdictions. This map demonstrates how the percentage of people of color in Los Altos and surrounding jurisdictions compares to the Bay Area as a whole:

- Jurisdictions shaded orange have a share of people of color that is less than the Bay Area as a whole, and the degree of difference is greater than five percentage points.
- Jurisdictions shaded white have a share of people of color comparable to the regional percentage of people of color (within five percentage points).
- Jurisdictions shaded grey have a share of people of color that is more than five percentage points greater than the regional percentage of people of color.

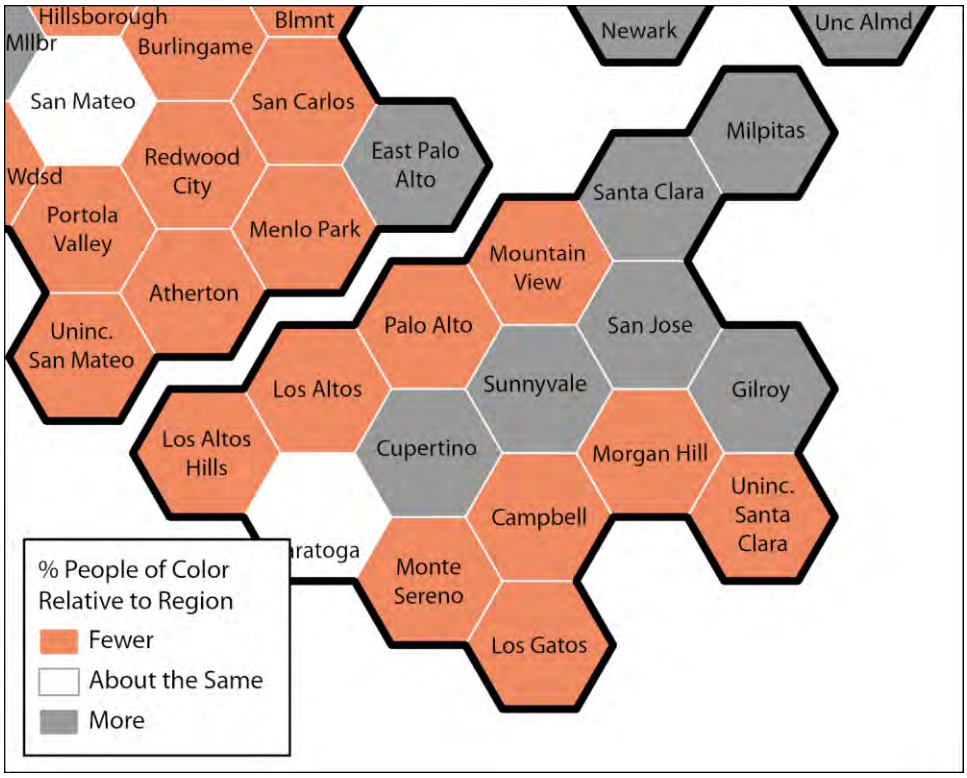

Figure 7: Comparing the Share of People of Color in Los Altos and Vicinity to the Bay Area (2020)

Universe: Population.
Source: U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.
Note: People of color refer to persons not identifying as non-Hispanic white. The nine-county Bay Area is the reference region for this map.

Segregation between jurisdictions in the region can also be analyzed by calculating regional values for the segregation indices discussed previously. Table 5 presents dissimilarity index, isolation index, and Theil's H index values for racial segregation for the entire nine-county Bay Area in 2010 and 2020. In the previous section of this report focused on neighborhood level racial segregation, these indices were calculated by comparing the racial demographics of the census tracts within a jurisdiction to the demographics of the jurisdiction as a whole. In Table 5, these measures are calculated by comparing the racial demographics of local jurisdictions to the region's racial makeup. For example, looking at the 2020 data, Table 5 shows the white isolation index value for the region is 0.429, meaning that on average white Bay Area residents live in a jurisdiction that is 42.9% white in 2020. An example of regional dissimilarity index values in Table 5 is the Black/white dissimilarity index value of 0.459, which means that across the region 45.9% of Black (or white) residents would need to move to a different jurisdiction to evenly distribute Black and white residents across Bay Area jurisdictions. The dissimilarity index values in Table 5 reflect recommendations made in HCD's AFFH guidance for calculating dissimilarity at the region level.[12] The regional value for the Theil's H index measures how

[12] For more information on HCD's recommendations regarding data considerations for analyzing integration and segregation patterns, see page 31 of the AFFH Guidance Memo.

diverse each Bay Area jurisdiction is compared to the racial diversity of the whole region. A Theil's H Index value of 0 would mean all *jurisdictions* within the Bay Area have the same racial demographics as the entire region, while a value of 1 would mean each racial group lives exclusively in their own separate jurisdiction. The regional Theil's H index value for racial segregation decreased slightly between 2010 and 2020, meaning that racial groups in the Bay Area are now slightly less separated by the borders between jurisdictions.

Table 5: Regional Racial Segregation Measures

Index	Group	2010	2020
Isolation Index Regional Level	Asian/Pacific Islander	0.317	0.378
	Black/African American	0.144	0.118
	Latinx	0.283	0.291
	White	0.496	0.429
	People of Color	0.629	0.682
Dissimilarity Index Regional Level	Asian/Pacific Islander vs. White	0.384	0.369
	Black/African American vs. White	0.475	0.459
	Latinx vs. White	0.301	0.297
	People of Color vs. White	0.296	0.293
Theil's H Multi-racial	All Racial Groups	0.103	0.097

Universe: Population.
Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, 2010 Census of Population and Housing, Table P4.

3 INCOME SEGREGATION IN CITY OF LOS ALTOS

Definition of Terms - Income Groups

When analyzing segregation by income, this report uses income group designations consistent with the Regional Housing Needs Allocation and the Housing Element:

Very low-income: individuals earning less than 50% of Area Median Income (AMI)

Low-income: individuals earning 50%-80% of AMI

Moderate-income: individuals earning 80%-120% of AMI

Above moderate-income: individuals earning 120% or more of AMI

Additionally, this report uses the term "lower-income" to refer to all people who earn less than 80% of AMI, which includes both low-income and very low-income individuals.

The income groups described above are based on U.S. Department of Housing and Urban Development (HUD) calculations for AMI. HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County).

The income categories used in this report are based on the AMI for the HUD metro area where this jurisdiction is located.

3.1 Neighborhood Level Income Segregation (*within* Los Altos)

Income segregation can be measured using similar indices as racial segregation. Income dot maps, similar to the racial dot maps shown in Figures 1 and 5, are useful for visualizing segregation between multiple income groups at the same time. The income dot map of Los Altos in Figure 8 below offers a visual representation of the spatial distribution of income groups within the jurisdiction. As with the racial dot maps, when the dots show lack of a pattern or clustering, income segregation measures tend to be lower, and conversely, when clusters are apparent, the segregation measures may be higher as well.

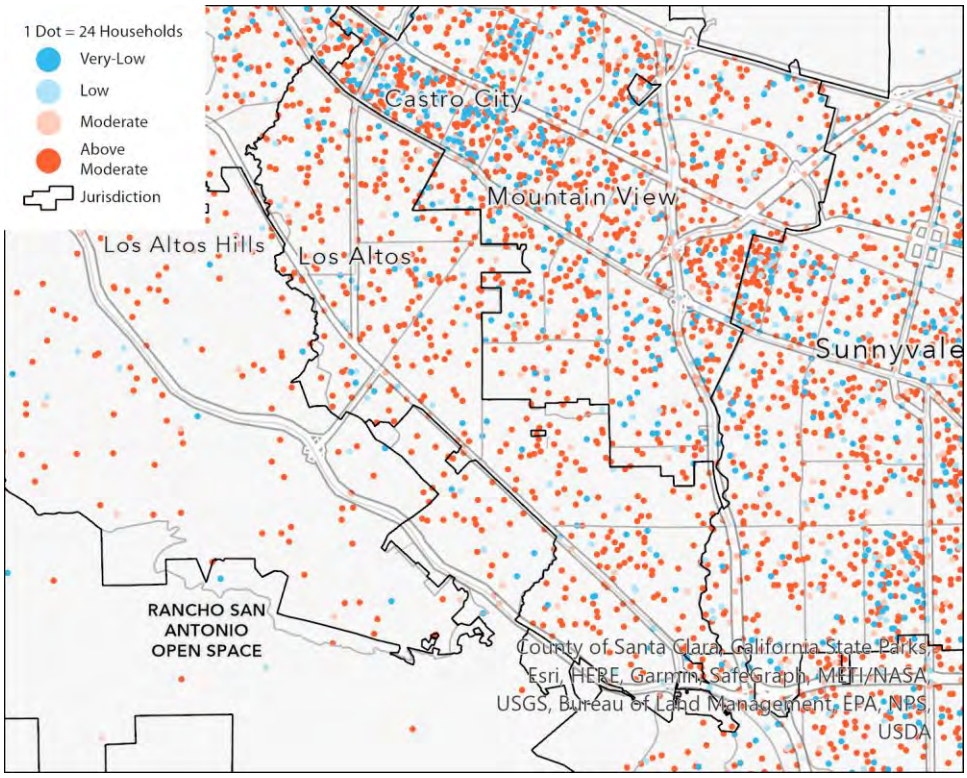

Figure 8: Income Dot Map of Los Altos (2015)

Universe: Population.
Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.
Note: The plot shows the income group distribution at the census block group level for City of Los Altos and vicinity. Dots in each block group are randomly placed and should not be construed as actual placement of individuals.

The isolation index values for all income groups in Los Altos for the years 2010 and 2015 can be found in Table 6 below.[13] Above Moderate-income residents are the most isolated income group in Los Altos. Los Altos's isolation index of 0.758 for these residents means that the average Above Moderate-income resident in Los Altos lives in a neighborhood that is 75.8% Above Moderate-income. Among all income groups, the Above Moderate-income population's isolation index has changed the most over time, becoming less segregated from other income groups between 2010 and 2015.

Similar to the tables presented earlier for neighborhood racial segregation, the "Bay Area Average" column in Table 6 provides the average isolation index value across Bay Area jurisdictions for different income groups in 2015. The data in this column can be used as a comparison to provide context for the levels of segregation experienced by income groups in this jurisdiction. For example, Table 6 indicates the average isolation index value for very low-income residents across Bay Area jurisdictions is 0.269,

[13] This report presents data for income segregation for the years 2010 and 2015, which is different than the time periods used for racial segregation. This deviation stems from the data source recommended for income segregation calculations in HCD's AFFH Guidelines. This data source most recently updated with data from the 2011-2015 American Community Survey 5-year estimates. For more information on HCD's recommendations for calculating income segregation, see page 32 of HCD's AFFH Guidelines.

meaning that in the average Bay Area jurisdiction a very low-income resident lives in a neighborhood that is 26.9% very low-income.

Table 6: Income Group Isolation Index Values for Segregation within Los Altos

	Los Altos		Bay Area Average
Income Group	**2010**	**2015**	**2015**
Very Low-Income (<50% AMI)	0.090	0.099	0.269
Low-Income (50%-80% AMI)	0.058	0.053	0.145
Moderate-Income (80%-120% AMI)	0.090	0.109	0.183
Above Moderate-Income (>120% AMI)	0.803	0.758	0.507

Universe: Population.
Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Figure 9 below shows how income group isolation index values in Los Altos compare to values in other Bay Area jurisdictions. In this chart, each dot represents a Bay Area jurisdiction. For each income group, the spread of dots represents the range of isolation index values among Bay Area jurisdictions. Additionally, the black line within each income group notes the isolation index value for that group in Los Altos, and each dashed red line represents the Bay Area average for the isolation index for that group. Local staff can use this chart to contextualize how segregation levels for income groups in their jurisdiction compare to the rest of the region.

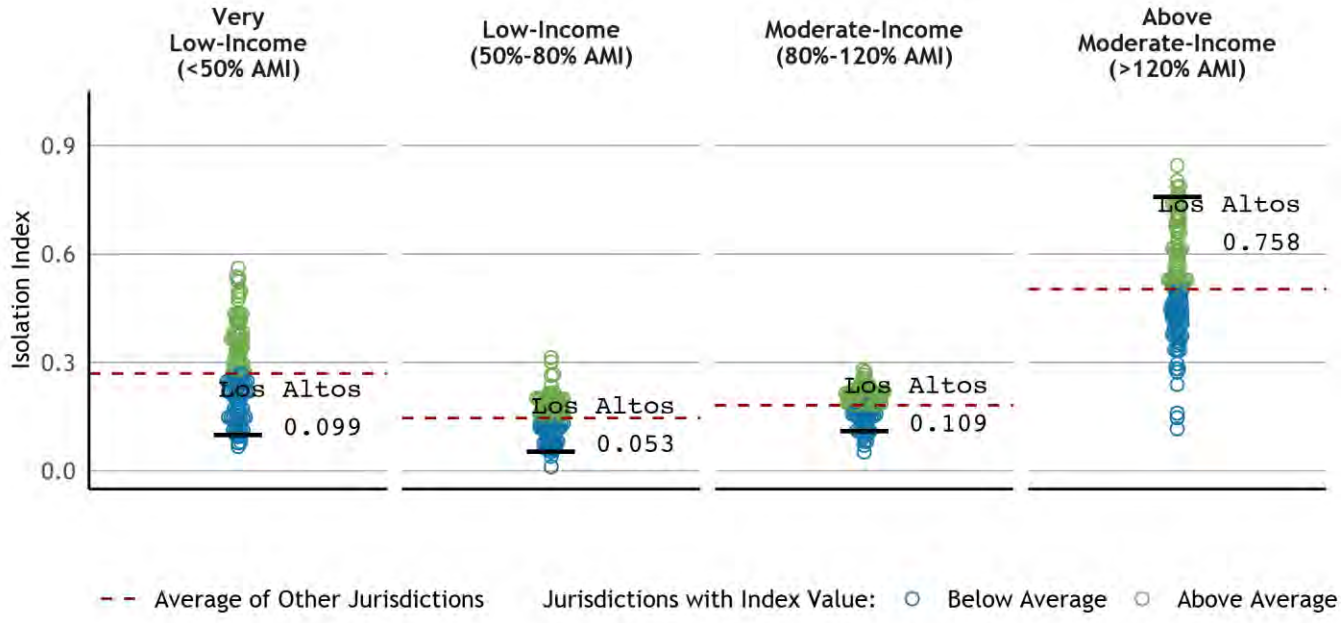

Figure 9: Income Group Isolation Index Values for Los Altos Compared to Other Bay Area Jurisdictions (2015)

Universe: Bay Area Jurisdictions.
Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

Table 7 below provides the dissimilarity index values indicating the level of segregation in Los Altos between residents who are lower-income (earning less than 80% of AMI) and those who are not lower-income (earning above 80% of AMI). This data aligns with the requirements described in HCD's AFFH Guidance Memo for identifying dissimilarity for lower-income households.[14] Segregation in Los Altos between lower-income residents and residents who are not lower-income decreased between 2010 and 2015. Additionally, Table 7 shows dissimilarity index values for the level of segregation in Albany between residents who are very low-income (earning less than 50% of AMI) and those who are above moderate-income (earning above 120% of AMI). This supplementary data point provides additional nuance to an analysis of income segregation, as this index value indicates the extent to which a jurisdiction's lowest and highest income residents live in separate neighborhoods.

Similar to other tables in this report, the "Bay Area Average" column shows the average dissimilarity index values for these income group pairings across Bay Area jurisdictions in 2015. For example, Table 7 indicates that the average dissimilarity index between lower-income residents and other residents in a Bay Area jurisdiction is 0.198, so on average 19.8% of lower-income residents in a Bay Area jurisdiction would need to move to a different neighborhood within the jurisdiction to create perfect income group integration in that jurisdiction.

[14] For more information, see page 32 of HCD's AFFH Guidance Memo.

In 2015, the income segregation in Los Altos between lower-income residents and other residents was lower than the average value for Bay Area jurisdictions (See Table 7). This means that the lower-income residents are less segregated from other residents within Los Altos compared to other Jurisdictions in the region.

Table 7: Income Group Dissimilarity Index Values for Segregation within Los Altos

	Los Altos		Bay Area Average
Income Group	**2010**	**2015**	**2015**
Below 80% AMI vs. Above 80% AMI	0.201	0.120	0.198
Below 50% AMI vs. Above 120% AMI	0.187	0.152	0.253

Universe: Population.
Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Figure 10 below shows how dissimilarity index values for income segregation in Los Altos compare to values in other Bay Area jurisdictions. In this chart, each dot represents a Bay Area jurisdiction. For each income group pairing, the spread of dots represents the range of dissimilarity index values among Bay Area jurisdictions. Additionally, the black line within each income group pairing notes the dissimilarity index value in Los Altos, and each dashed red line represents the Bay Area average for the dissimilarity index for that pairing. Local staff can use this chart to contextualize how segregation levels between lower-income residents and wealthier residents in their jurisdiction compared to the rest of the region.

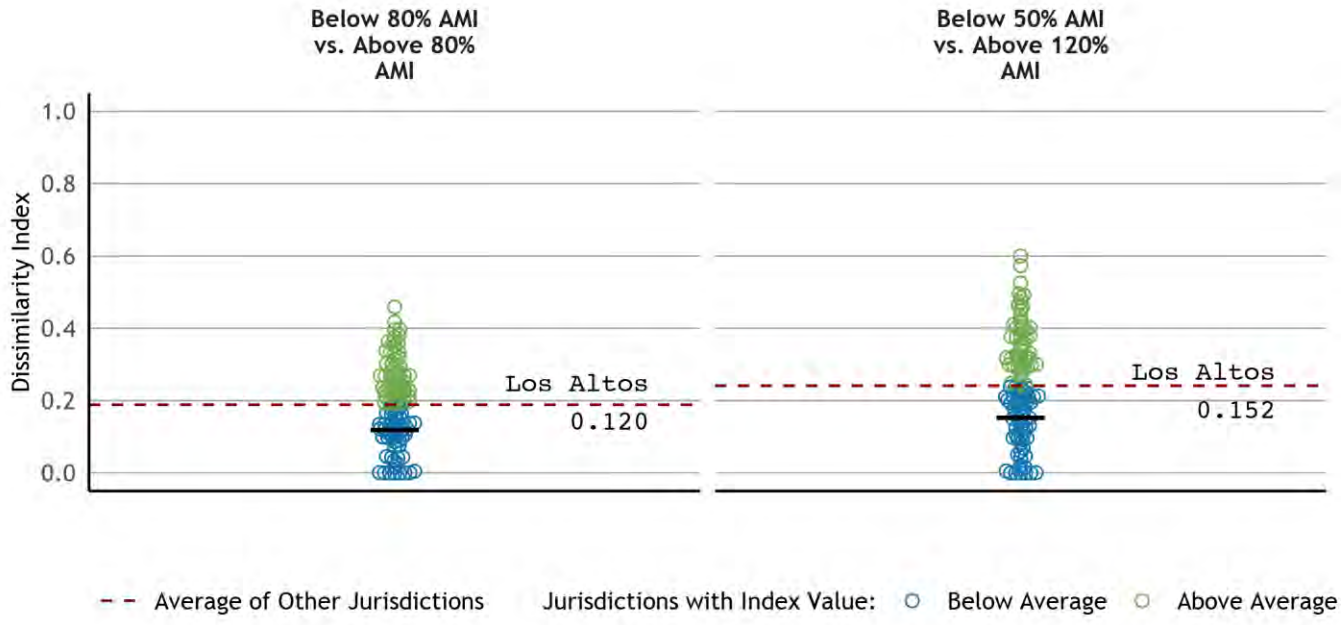

Figure 10: Income Group Dissimilarity Index Values for Los Altos Compared to Other Bay Area Jurisdictions (2015)

Universe: Bay Area Jurisdictions.
Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

The Theil's H Index values for neighborhood income group segregation in Los Altos for the years 2010 and 2015 can be found in Table 8 below. The "Bay Area Average" column in this table provides the average Theil's H Index value across Bay Area jurisdictions for different income groups in 2015. By 2015, the Theil's H Index value for income segregation in Los Altos was less than it had been in 2010. In 2015, the Theil's H Index value for income group segregation in Los Altos was lower than the average value for Bay Area jurisdictions, indicating there is less neighborhood level income segregation in Los Altos than in the average Bay Area city.

Table 8: Theil's H Index Values for Income Segregation within Los Altos

	Los Altos		Bay Area Average
Index	**2010**	**2015**	**2015**
Theil's H Multi-income	0.029	0.012	0.043

Universe: Population.
Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Figure 11 below shows how Theil's H index values for income group segregation in Los Altos compare to values in other Bay Area jurisdictions in 2015. In this chart, each dot represents a Bay Area jurisdiction. Additionally, the black line notes the Theil's H index value for income group segregation in Los Altos, and the dashed red line represents the average Theil's H index value across Bay Area jurisdictions. Local staff can use this chart to compare how neighborhood income group segregation levels in their jurisdiction compare to other jurisdictions in the region.

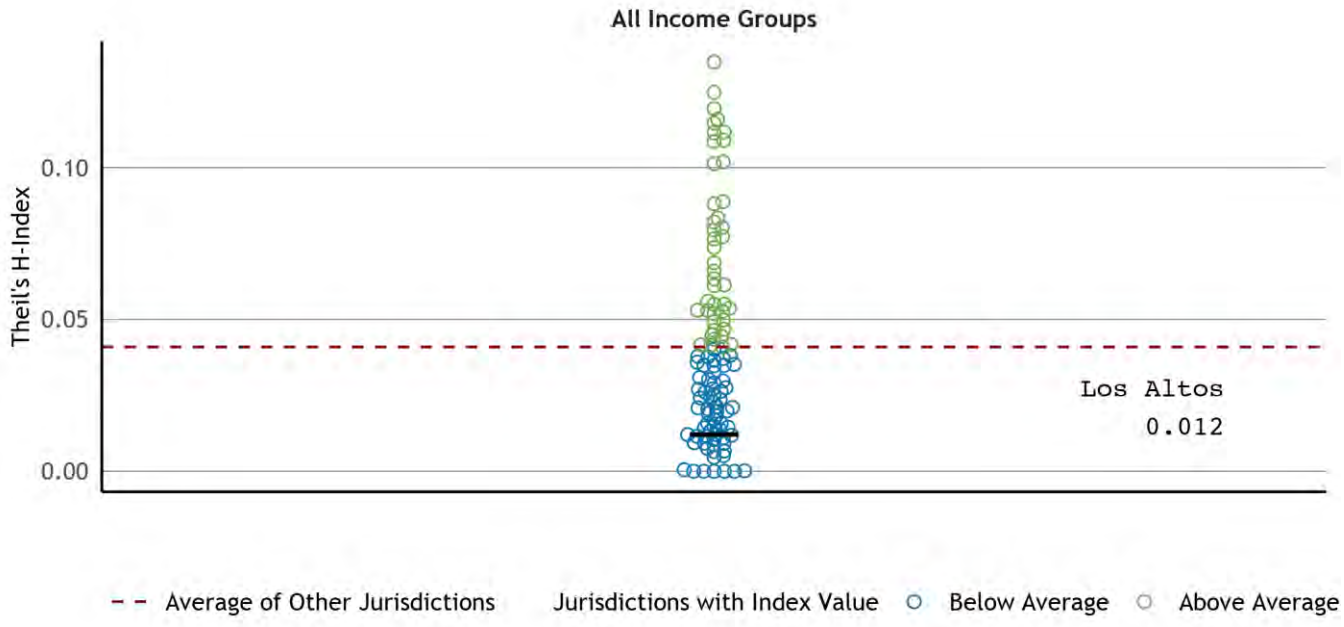

Figure 11: Income Group Theil's H Index Values for Los Altos Compared to Other Bay Area Jurisdictions (2015)

Universe: Bay Area Jurisdictions.
Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

3.2 Regional Income Segregation (*between* Los Altos and other jurisdictions)

At the regional level, segregation is measured between jurisdictions instead of between neighborhoods. Income dot maps are not only useful for examining neighborhood income segregation within a jurisdiction, but these maps can also be used to explore income demographic differences between jurisdictions in the region. Figure 12 below presents an income dot map showing the spatial distribution of income groups in Los Altos as well as in nearby Bay Area jurisdictions.

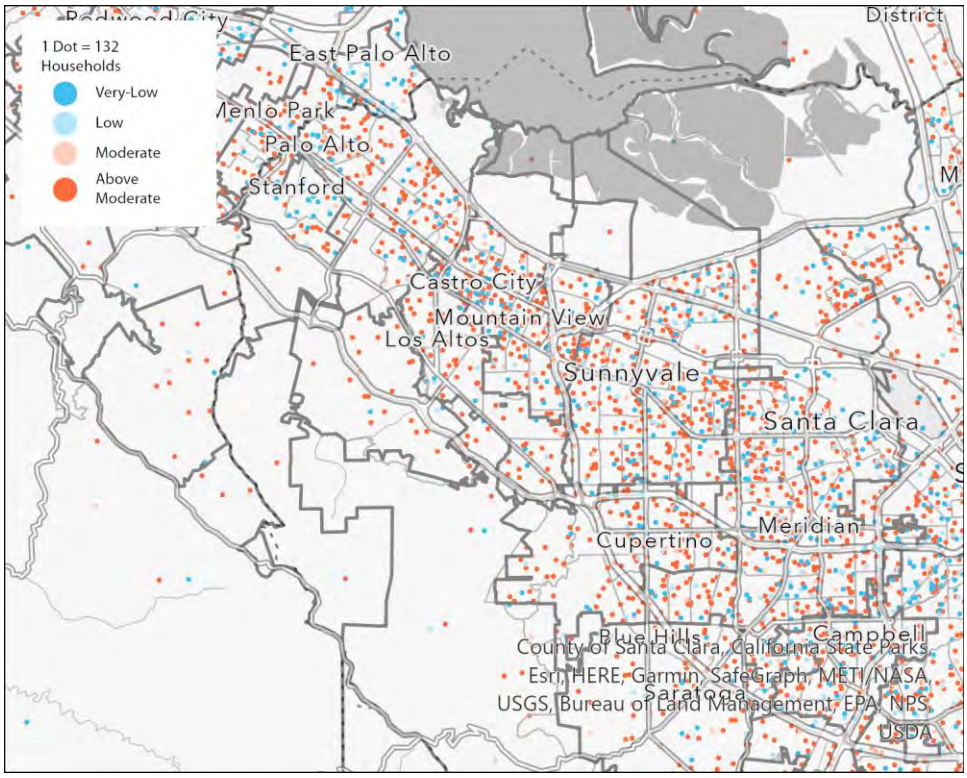

Figure 12: Income Dot Map of Los Altos and Surrounding Areas (2015)

Universe: Population.
Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.
Note: The plot shows the income group distribution at the census block group level for City of Los Altos and vicinity. Dots in each block group are randomly placed and should not be construed as actual placement of individuals.

When looking at income segregation between jurisdictions in the Bay Area, one can examine how Los Altos differs from the region. The income demographics in Los Altos for the years 2010 and 2015 can be found in Table 9 below. The table also provides the income composition of the nine-county Bay Area in 2015. As of that year, Los Altos had a lower share of very low-income residents than the Bay Area as a whole, a lower share of low-income residents, a lower share of moderate-income residents, and a higher share of above moderate-income residents.

Table 9: Population by Income Group, Los Altos and the Region

	Los Altos		Bay Area
Income Group	**2010**	**2015**	**2015**
Very Low-Income (<50% AMI)	7.86%	9.3%	28.7%
Low-Income (50%-80% AMI)	4.4%	4.84%	14.3%
Moderate-Income (80%-120% AMI)	7.96%	10.43%	17.6%
Above Moderate-Income (>120% AMI)	79.78%	75.42%	39.4%

Universe: Population.
Source: Data for 2015 is from Housing U.S. Department of and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Figure 13 below compares the income demographics in Los Altos to other Bay Area jurisdictions.[15] Like the chart in Figure 3, each dot represents a Bay Area jurisdiction. For each income group, the spread of dots represents the range of that group's representation among Bay Area jurisdictions. The smallest range is among jurisdictions' moderate-income populations, while Bay Area jurisdictions vary the most in the share of their population that is above moderate-income. Additionally, the black lines within each income group note the percentage of Los Altos population represented by that group and how that percentage ranks among other jurisdictions. Local staff can use this chart to compare the representation of different income groups in their jurisdiction to those groups' representation in other jurisdictions in the region, which can indicate the extent of segregation between this jurisdiction and the region.

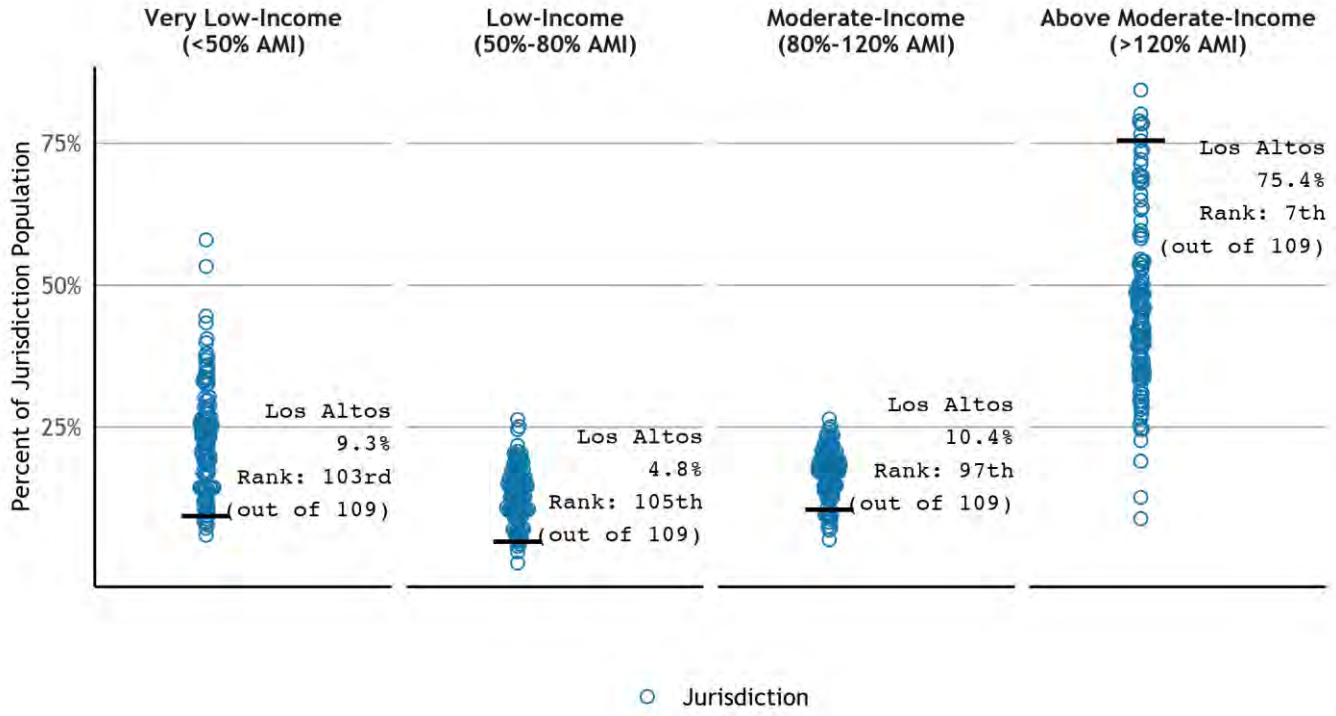

Figure 13: Income Demographics of Los Altos Compared to Other Bay Area Jurisdictions (2015)

Universe: Bay Area Jurisdictions.
Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

[15] While comparisons of segregation measures are made only using the 104 jurisdictions with more than one census tract, this comparison of jurisdiction level demographic data can be made using all 109 jurisdictions.

Income segregation between jurisdictions in the region can also be analyzed by calculating regional values for the segregation indices discussed previously. Similar to the regional racial segregation measures shown in Table 5, Table 10 presents dissimilarity index, isolation index, and Theil's H index values for income segregation for the entire nine-county Bay Area in 2010 and 2015. In the previous section of this report focused on neighborhood level income segregation, segregation indices were calculated by comparing the income demographics of the census tracts within a jurisdiction to the demographics of the jurisdiction as a whole. In Table 10, these measures are calculated by comparing the income demographics of local jurisdictions to the region's income group makeup. For example, looking at 2015 data, Table 10 shows the regional isolation index value for very low-income residents is 0.315 for 2015, meaning that on average very low-income Bay Area residents live in a jurisdiction that is 31.5% very low-income. The regional dissimilarity index for lower-income residents and other residents is 0.194 in 2015, which means that across the region 19.4% of lower-income residents would need to move to a different jurisdiction to create perfect income group integration in the Bay Area as a whole. The regional value for the Theil's H index measures how diverse each Bay Area jurisdiction is compared to the income group diversity of the whole region. A Theil's H Index value of 0 would mean all jurisdictions within the Bay Area have the same income demographics as the entire region, while a value of 1 would mean each income group lives exclusively in their own separate jurisdiction. The regional Theil's H index value for income segregation decreased slightly between 2010 and 2015, meaning that income groups in the Bay Area are now slightly less separated by the borders between jurisdictions.

Table 10: Regional Income Segregation Measures

Index	Group	2010	2015
Isolation Index Regional Level	Very Low-Income (<50% AMI)	0.277	0.315
	Low-Income (50%-80% AMI)	0.157	0.154
	Moderate-Income (80%-120% AMI)	0.185	0.180
	Above Moderate-Income (>120% AMI)	0.467	0.435
Dissimilarity Index Regional Level	Below 80% AMI vs. Above 80% AMI	0.186	0.194
	Below 50% AMI vs. Above 120% AMI	0.238	0.248
Theil's H Multi-income	All Income Groups	0.034	0.032

Universe: Population.
Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

4 APPENDIX 1: SUMMARY OF FINDINGS

4.1 Segregation in City of Los Altos

- The isolation index measures the segregation of a single group, and the dissimilarity index measures segregation between two different groups. The Theil's H-Index can be used to measure segregation between all racial or income groups across the city at once.
- As of 2020, white residents are the most segregated compared to other racial groups in Los Altos, as measured by the isolation index. White residents live in neighborhoods where they are less likely to come into contact with other racial groups.
- Among all racial groups, the white population's isolation index value has changed the most over time, becoming less segregated from other racial groups between 2000 and 2020.
- According to the dissimilarity index, within Los Altos the highest level of racial segregation is between Black and white residents.[16] However, local jurisdiction staff should note that this dissimilarity index value is not a reliable data point due to small population size.
- According to the Theil's H-Index, neighborhood racial segregation in Los Altos declined between 2010 and 2020. Neighborhood income segregation declined between 2010 and 2015.
- Above Moderate-income residents are the most segregated compared to other income groups in Los Altos. Above Moderate-income residents live in neighborhoods where they are less likely to encounter residents of other income groups.
- Among all income groups, the Above Moderate-income population's segregation measure has changed the most over time, becoming less segregated from other income groups between 2010 and 2015.
- According to the dissimilarity index, segregation between lower-income residents and residents who are not lower-income has decreased between 2010 and 2015. In 2015, the income segregation in Los Altos between lower-income residents and other residents was lower than the average value for Bay Area jurisdictions.

4.2 Segregation Between City of Los Altos and Other jurisdictions in the Bay Area Region

- Los Altos has a higher share of white residents than other jurisdictions in the Bay Area as a whole, a lower share of Latinx residents, a lower share of Black residents, and a higher share of Asian/Pacific Islander residents.

[16] The analysis conducted for this report suggests that dissimilarity index values are unreliable for a population group if that group represents approximately less than 5% of the jurisdiction's total population. ABAG/MTC recommends that when cities have population groups that are less than 5% of the jurisdiction's population (see Table 15 in Appendix 2), jurisdiction staff could focus on the isolation index or Thiel's H-Index to gain a more accurate understanding of neighborhood-level racial segregation in their jurisdiction.

- Regarding income groups, Los Altos has a lower share of very low-income residents than other jurisdictions in the Bay Area as a whole, a lower share of low-income residents, a lower share of moderate-income residents, and a higher share of above moderate-income residents.

5 APPENDIX 2: SEGREGATION DATA

Appendix 2 combines tabular data presented throughout this report into a more condensed format. This data compilation is intended to enable local jurisdiction staff and their consultants to easily reference this data and re-use the data in the Housing Element or other relevant documents/analyses.

Table 11 in this appendix combines data from Table 1, Table 2, and Table 3 in the body of the report. Table 12 in this appendix combines data from Table 6, Table 7, and Table 8 in the body of the report. Table 13 represents a duplication of Table 5 in the body of the report; Table 14 represents a duplication of Table 10 in the body of the report; Table 15 in this appendix represents a duplication of Table 4 in the body of the report, while Table 16 represents a duplication of Table 9 in the body of the report.

Table 11: Neighborhood Racial Segregation Levels in Los Altos

		Los Altos			Bay Area Average
Index	**Race**	**2000**	**2010**	**2020**	**2020**
Isolation	Asian/Pacific Islander	0.167	0.247	0.358	0.245
	Black/African American	0.005	0.005	0.008	0.053
	Latinx	0.034	0.042	0.053	0.251
	White	0.784	0.682	0.530	0.491
Dissimilarity	Asian/Pacific Islander vs. White	0.126	0.086	0.068	0.185
	Black/African American vs. White	0.177*	0.144*	0.124*	0.244
	Latinx vs. White	0.138*	0.120*	0.089*	0.207
	People of Color vs. White	0.113	0.080	0.064	0.168
Theil's H Multi-racial	All	0.012	0.009	0.006	0.042

Universe: Population.
Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, 2010 Census of Population and Housing, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.
Note: If a number is marked with an asterisk (*), it indicates that the index is based on a racial group making up less than 5 percent of the jurisdiction population, leading to unreliable numbers.

Table 12: Neighborhood Income Segregation Levels in Los Altos

		Los Altos		Bay Area Average
Index	**Income Group**	**2010**	**2015**	**2015**
Isolation	Very Low-Income (<50% AMI)	0.090	0.099	0.269
	Low-Income (50%-80% AMI)	0.058	0.053	0.145
	Moderate-Income (80%-120% AMI)	0.090	0.109	0.183
	Above Moderate-Income (>120% AMI)	0.803	0.758	0.507
Dissimilarity	Below 80% AMI vs. Above 80% AMI	0.201	0.120	0.198
	Below 50% AMI vs. Above 120% AMI	0.187	0.152	0.253
Theil's H Multi-racial	All	0.029	0.012	0.043

Universe: Population.
Source: Income data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Table 13: Regional Racial Segregation Measures

Index	Group	2010	2020
Isolation Index Regional Level	Asian/Pacific Islander	0.317	0.378
	Black/African American	0.144	0.118
	Latinx	0.283	0.291
	White	0.496	0.429
	People of Color	0.629	0.682
Dissimilarity Index Regional Level	Asian/Pacific Islander vs. White	0.384	0.369
	Black/African American vs. White	0.475	0.459
	Latinx vs. White	0.301	0.297
	People of Color vs. White	0.296	0.293
Theil's H Multi-racial	All Racial Groups	0.103	0.097

Universe: Population.
Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, 2010 Census of Population and Housing, Table P4.

Table 14: Regional Income Segregation Measures

Index	Group	2010	2015
Isolation Index Regional Level	Very Low-Income (<50% AMI)	0.277	0.315
	Low-Income (50%-80% AMI)	0.157	0.154
	Moderate-Income (80%-120% AMI)	0.185	0.180
	Above Moderate-Income (>120% AMI)	0.467	0.435
Dissimilarity Index Regional Level	Below 80% AMI vs. Above 80% AMI	0.186	0.194
	Below 50% AMI vs. Above 120% AMI	0.238	0.248
Theil's H Multi-income	All Income Groups	0.034	0.032

Universe: Population.
Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Table 15: Population by Racial Group, Los Altos and the Region

	Los Altos			Bay Area
Race	**2000**	**2010**	**2020**	**2020**
Asian/Pacific Islander	15.35%	23.64%	35.36%	35.8%
Black/African American	0.46%	0.47%	0.56%	5.6%
Latinx	2.97%	3.91%	4.86%	28.2%
Other or Multiple Races	3.02%	4.19%	6.63%	24.4%
White	78.2%	67.79%	52.58%	5.9%

Universe: Population.
Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, 2010 Census of Population and Housing, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Table 16: Population by Income Group, Los Altos and the Region

	Los Altos		Bay Area
Income Group	**2010**	**2015**	**2015**
Very Low-Income (<50% AMI)	7.86%	9.3%	28.7%
Low-Income (50%-80% AMI)	4.4%	4.84%	14.3%
Moderate-Income (80%-120% AMI)	7.96%	10.43%	17.6%
Above Moderate-Income (>120% AMI)	79.78%	75.42%	39.4%

Universe: Population.
Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

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Appendix G: Housing Resources

Contents

Section G.1 Financial and Administrative Resources

G.1.1 Local Resources

Below Market Rate (BMR) Housing Rental Program

Alta Housing administers the City of Los Altos' Below Market Rate (BMR) Housing Rental Program, a program that provides rental apartments in Los Altos for low and moderate-income households. BMR rental units are leased at rates below prevailing market rents, and rent increases are subject to certain limitations. BMR renters are selected from a waiting list and must meet special income and other eligibility requirements. There are currently 51 BMR rental units managed by Alta Housing for the City.

Inclusionary Housing Program

Multi-family projects that propose five or more market-rate units in Los Altos must include some affordable housing units under the City's Zoning Code (Municipal Code Chapter 14.28); this is the primary source of affordable housing in Los Altos. Affordable housing units are deed restricted to moderate, low, and very low-income levels. The City has 54 BMR ownership units, for a total of 105 deed restricted BMR units, including the 51 rental units (noted above), managed by Alta Housing for the City.

G.1.2 Regional Resources

Santa Clara County

- **Measure A:** In November 2016, Santa Clara County voters approved Measure A – the $950 million affordable housing bond. The housing bond provides the County with an unprecedented opportunity to partner with cities, residents, and the affordable and supportive housing community to significantly address the housing needs of the community's poorest and most vulnerable residents. It will provide affordable housing for vulnerable populations including veterans, seniors, the disabled, low and moderate-income individuals or families, foster youth, victims of abuse, the homeless and individuals suffering from mental health or substance abuse illnesses. The bond proceeds would contribute to the creation and/or preservation of approximately 4,800 affordable housing units. As of March 31, 2021, $607.85 million has been allocated to various Measure A programs, including $570.95 million toward 46 housing projects throughout Santa Clara County (no Measure A housing projects have currently been approved for Los Altos). $25 million has been committed to the first-time homebuyer loan program, and $11.9 million has been committed to a supportive housing fund for predevelopment loans. As of March 2021, $342.15 million approved by Measure A has yet to be allocated. Eligible applicants include non-profit organizations, tax-credit limited partnerships, or limited liability

corporations, mission aligned for-profit affordable housing developers, public agencies, other local jurisdictions, and joint ventures of the above.

- **Empower Homebuyers County of Santa Clara Program:** Empower Homebuyers SCC is a program of the County of Santa Clara administered by Housing Trust Silicon Valley. It provides down payment assistance loans to first-time homebuyers in the county and is funded by the 2016 Measure A Affordable Housing Bond. The program is aimed at assisting low to moderate income County residents – including employees at nonprofit organizations, teachers, healthcare professionals, County employees and others. The loan can be for up to 17 percent of a home's purchase price – which means an additional three percent from a first-time homebuyer would reach a down payment of 20 percent. Regardless of the amount borrowed, there are no monthly payments or interest with an Empower Homebuyers loan. The Empower loan plus a share of the appreciation on the home is repaid when the loan matures, or the homeowner decides to sell or refinance the mortgage.
- **HomeFirst Homeless Helpline:** HomeFirst's Outreach team provides access to emergency shelter, showers, laundry, meals, medical services, case management, and employment training in Santa Clara County.
- **Housing and Community Development Asset Management:** The Santa Clara County Department of Office of Supportive Housing, Housing and Community Development Asset Management team oversees and monitors the operation and financial performance of the affordable and multifamily rental projects that have been developed with financial and other forms of support from the County of Santa Clara. These projects serve a variety of low-income populations: families, seniors, disabled individuals, veterans, chronically homeless people, transition-age youth, and people with HIV/AIDS, among others. The Asset Management Team's primary responsibility is to service loans and grants provided for these projects to various non-profit and for-profit organizations. The Team is also responsible for monitoring the compliance of each project with a host of obligations that borrowers and grantees agreed to as a condition of County's financing/support.
- **Santa Clara County's Mortgage Credit Certificate (MCC) Program:** This program provides income eligible first-time home buyers the opportunity to reduce the amount of federal income tax they owe each year they own and live in their home. The Mortgage Credit Certificate (MCC) assists a family in qualifying for a higher first mortgage with no effect on monthly expenses. Refinanced Mortgage Credit Certificates (RMCC) are also available when the homeowner refinances their original MCC Loan. A RMCC must be issued for each refinance for the homeowner to continue receiving their federal tax credit. The estimated number of MCCs to be issued from the March 20, 2019, CDLAC allocation was 16. Funding for this program is provided by the California Debt Limit Allocation Committee (CDLAC).

- **Santa Clara County Shelter List:** The County maintains a list of shelters for families with children, shelters for adults without children, and shelters for veterans on its Office of Supportive Housing website.
- **Warming and Cooling Center Information:** The County of Santa Clara Office of Supportive Housing works with service providers to open warming/cooling centers during inclement weather episodes (such as rain events, or extreme cold or heat events). In the event of an emergency, inclement weather episodes and shelter availability, or housing-related issues, the Office of Supportive Housing has arranged with the County Office of Emergency Services to be able to send text messages to the homeless, service providers, and anyone else who has requested to receive the messages. The County Library located in Los Altos (13 South San Antonio Road) is identified as a warming center during regular Library business hours.

Santa Clara County Housing Authority

- **Section 8 Chronically Homeless Direct Referral Program:** SCCHA's Chronically Homeless Direct Referral (CHDR) program is a locally designed voucher referral program for the chronically homeless population in Santa Clara County. A partnership between SCCHA and the County of Santa Clara ensures that chronically homeless families who receive vouchers are connected to supportive programs and case management services.
- **Section 8 Family Unification Program:** The Family Unification Program (FUP) is a partnership between SCCHA and Santa Clara County through its Social Services Agency, Department of Family and Children Services (DFCS). FUP provides rental assistance for families whose lack of adequate housing is a primary factor in the placement of their children in out-of-home care or in the delay of their children returning home. SCCHA administers FUP Housing Choice Vouchers (HCV) rental assistance. DFCS refers FUP-eligible families to SCCHA and provides case management and supportive services before and after the family is housed.
- **Section 8 Family Self-Sufficiency:** The Family Self Sufficiency (FSS) program provides case management and advocacy to current program participants in order to help them attain self-sufficiency goals. Families enroll and sign a five-year contract to participate in the program. After enrolling in the program, participants set goals such as finishing their education, obtaining job training, and/or employment. During the contract term, participants who increase their earned income can receive cash bonuses. When the family reports an increase in earned income, SCCHA calculates a monthly bonus amount that is deposited into an 'escrow' account which the family can receive upon program graduation.
- **Section 8 Homeownership Program:** The Homeownership program is an optional U.S. Department of Housing and Urban Development (HUD) program that permits housing authorities to assist Housing Choice Voucher (Section 8) households in the purchase of their first homes. Participants in this program receive housing assistance payments to use

toward their homeownership expenses. SCCHA administers this program for current participants but no longer accepts new applications.

- **Section 8 Housing Choice Voucher Program:** The Housing Choice Voucher (Section 8) program is SCCHA's largest rental assistance program with about 17,000 participants. The "housing choice voucher" is a 100 percent federally funded rental subsidy for low-income households living in privately owned rental units. SCCHA voucher holders in the Moving to Work (MTW) program pay 32 percent of their gross income toward rent (or a minimum rent of $50, whichever is higher), and the agency pays the balance of the rent directly to the landlords on behalf of the families. Voucher holders are also required to pay that portion of their lease contract rent that is above SCCHA's payment standard for their unit size. Currently, there are six households in Los Altos participating in the Section 8 Housing Choice Voucher Program[1].
- **Section 8 Mainstream Voucher Program:** The Mainstream Voucher program provides vouchers for low-income households that include a person(s) with disabilities. The program is designed to help tenants with disabilities live independently in the community.
- **Section 8 Moderate Rehabilitation Program:** The Moderate Rehabilitation (Mod Rehab) program attaches Housing Choice Voucher (HCV) rental assistance to privately owned units that are rehabilitated. Under the Mod Rehab program, SCCHA enters into a Housing Assistance Payments contract with the property owner for a specified unit and for a specified term. Mod Rehab assistance is tied to the unit, as opposed to the tenant. A family who moves from a Mod Rehab unit is not eligible to receive tenant-based HCV assistance. SCCHA administers this program for current Mod Rehab properties but no longer accepts new/additional units under this program.
- **Section 8 Non-Elderly Disabled Program:** The Non-Elderly Disabled (NED) program provides assistance to non-elderly persons with disabilities who are currently residing in long-term care facilities. This voucher program is intended to help participants leave the long-term care facility and live independently. The NED program is a partnership between SCCHA and the Silicon Valley Independent Living Center (SVILC). SVILC provides NED program applicant referrals, case management, and supportive services.
- **Section 8 Project-Based Voucher Program:** The Project Based Voucher (PBV) program attaches the rental assistance voucher to private (including SCCHA-owned/operated) housing units. Under the PBV program, SCCHA enters into a Housing Assistance Payments contract with the property owner for specified units and for a specified term. PBV units are leased to eligible low-income tenants from SCCHA's PBV Waiting List or in some cases referred by the property owner. PBV rental assistance is contractually tied to

[1] Santa Clara County Housing Authority, email correspondence with Ricardo Alvarez, Housing Programs Manager (March 14, 2022).

the unit, as opposed to the tenant. A family who moves from the project-based unit may be eligible to receive HCV (tenant-based) assistance, if available.

- **Section 8 VASH Program:** The HUD-VASH program provides assistance to homeless veterans by combining rental assistance with case management and clinical services. The HUD-VASH program is a partnership between the Veterans Affairs Palo Alto Health Care System (VA Palo Alto) and SCCHA. The VA Palo Alto refers homeless veterans to the HUD-VASH program and provides case management, while SCCHA administers rental assistance to eligible veterans.

G.1.3 State Resources

- **Affordable Housing and Sustainable Communities Program (AHSC):** Administered by the Strategic Growth Council, this program provides grants and/or loans to fund land-use, housing, transportation, and land preservation projects that support infill and compact development that reduce greenhouse gas emissions.
- **CalHome:** HCD provides grants to local public agencies and non-profit housing developers to assist first-time homebuyers become or remain homeowners through deferred-payment loans. Funds can also be used to assist in the development of multiple-unit homeownership programs.
- **California Emergency Solutions and Housing (CESH):** This program provides funds for a variety of activities to assist persons experiencing or at risk of homelessness, such as housing relocation and stabilization services (including rental assistance), operating subsidies for permanent housing, flexible housing subsidies, emergency housing operating support, and homeless delivery systems.
- **California Housing Finance Agency (CalHFA):** CalHFA offers a variety of low-cost loan programs to support the development of affordable multi-family rental housing, mixed-income housing, and special needs housing.
- **California Housing Finance Agency (CalHFA), Mortgage Credit Certificate Program:** The MCC program is a homebuyer assistance program designed to help lower-income families afford home ownership. The program allows home buyers to claim a dollar-for-dollar tax credit for a portion of mortgage interest paid per year, up to $2,000. The remaining mortgage interest paid may still be calculated as an itemized deduction.
- **California Self-Help Housing Program (CSHHP):** Provides grants for sponsor organizations that provide technical assistance for low and moderate-income families to build their homes with their own labor.
- **Elderlink:** A senior care referral service licensed by the Department of Public Health. This organization provides independent and free personalized senior care placement services to fully screened and approved nursing home, board and care, and assisted living facilities.

- **Golden State Acquisition Fund (GSAF):** This $93 million fund provides low-cost financing aimed at supporting the creation and preservation of affordable housing across the state. GSAF makes up to five-year loans to developers for acquisition or preservation of affordable housing.
- **Homekey:** Homekey provides grants to acquire and rehabilitate a variety of housing types, such as hotels and residential care facilities, to serve people experiencing homelessness or who are also at risk of serious illness from COVID-19.
- **Housing for a Healthy California (HHC) Program:** This program provides funding to deliver supportive housing opportunities to developers using the federal National Housing Trust Funds (NHTF) allocations for operating reserve grants and capital loans. The HHC program is intended to create supportive housing for individuals who are recipients of or eligible for health care provided through the California Department of Health Care Services' Medi-Cal program.
- **Housing Navigator's Program:** This grant program allocates funding to counties for the support of housing navigators to help young adults aged 18 to 21 years secure and maintain housing, with priority for individuals in the foster care system.
- **Infill Infrastructure Grant Program (IIG):** This program promotes infill housing development by providing grant funding, in the form of gap assistance, for infrastructure improvements required for qualifying multi-family or mixed-use residential development.
- **Joe Serna, Jr. Farmworker Housing Grant (FWHG) Program:** This program provides deferred payment loans for both owner-occupied and rental housing for agricultural workers, with a priority for lower income households.
- **Local Housing Trust Fund (LHTF) Program:** This program provides matching funds to local or regional housing trust funds for the creation, preservation, and rehabilitation of affordable housing, transitional housing, or emergency shelters.
- **Mills Act:** The Mills Act is an economic incentive programs for the restoration and preservation of qualified historic buildings by private property owners. It grants local governments the authority to enter into contracts with owners of qualified historic properties who actively participate in the restoration and maintenance of their historic properties while receiving property tax relief. Los Altos administers a Mills Act program, which furthers housing affordability by reducing property taxes and preserving existing housing stock.
- **Mobilehome Park Rehabilitation and Resident Ownership Program (MPRROP):** This program provides financing to support the preservation of affordable mobilehome parks through conversion of the park to ownership or control by resident organizations, nonprofit housing sponsors, or local public entities.

- **Multifamily Housing Program (MHP):** This program provides deferred payment loans for the construction, preservation, and rehabilitation of permanent and transitional rental housing for lower-income households.
- **No Place Like Home Program:** This program invests in the development of permanent supportive housing for persons who are in need of mental health services and are experiencing homelessness, chronic homelessness, or who are at risk of chronic homelessness.
- **National Housing Trust Fund:** This program provides deferred payment or forgivable loans for the construction of permanent housing for extremely low-income households. The required affordability covenant is for 55 years.
- **Permanent Local Housing Allocation (PLHA) Program:** This program provides a permanent source of funding to all local governments in California to help cities and counties implement plans to increase affordable housing stock. Funding for this program is provided through a $75 recording fee on real estate transactions.
- **Predevelopment Loan Program (PDLP):** This program provides financing to cover pre-development costs to construct, preserve, or rehabilitate assisted housing.
- **Supportive Housing Multifamily Housing Program (SHMHP):** This program provides low interest deferred loan payments to developers building affordable rental housing that contain supportive housing units.
- **Transit-Oriented Development (TOD) Housing Program:** This program provides low-interest loans as gap financing for higher density affordable rental housing within one-quarter mile of transit stations. Grants are also available to localities and transit agencies for infrastructure improvements necessary for the development of specified housing developments or to facilitate connections between these developments and the transit station. The maximum total award amount for a single project is $15 million.
- **Transitional Housing Program (THP):** This program provides funding to counties for child welfare services agencies to help young adults aged 18 to 25 years find and maintain housing, with priority given to those formerly in the foster care or probation systems.
- **Veterans Housing and Homelessness Prevention Program (VHHP):** This program supports the acquisition, construction, rehabilitation, and preservation of affordable multi-family housing for veterans and their families.

G.1.4 Federal Resources

- **Community Development Block Grant (CDBG):** The Community Development Block Grant (CDBG) Program was created by the Housing and Community Development (HCD) Act of 1974. In the County of Santa Clara, the CDBG Program is operated by the Office of Supportive Housing. The County CDBG Program is federally funded by the United States Department of Housing and Urban Development (HUD) to assist lower-income and special needs persons to address housing and community development needs. The County of Santa Clara administers CDBG on behalf of the Unincorporated Areas of Santa Clara County and the Cities of Campbell, Los Altos, Los Altos Hills, Los Gatos, Monte Sereno, Morgan Hill, and Saratoga, also known as the Urban County Program.
- **Continuum of Care (CoC) Program:** The Continuum of Care (CoC) Program is designed to promote communitywide commitment towards ending homelessness. It provides funding to nonprofits, state, and local governments to provide shelter and services to people experiencing homelessness.
- **Emergency Solutions Grants (ESG) Program:** This program provides funding for cities, counties, and states to engage homeless individuals and families living on the street; improve the number and quality of emergency shelters for homeless individuals and families; help operate these shelters; provide essential services to shelter residents; rapidly rehouse homeless individuals and families; and prevent families/individuals from becoming homeless.
- **Home Investment Partnerships Program (HOME Program):** The Home Investment Partnerships Program ("HOME Program") is federally funded by the United States Department of Housing and Urban Development (HUD). Participating jurisdictions may use HOME funds for a variety of housing activities, according to local housing needs. Eligible uses of funds include tenant-based rental assistance; housing rehabilitation; assistance to homebuyers; and new construction of housing. HOME funding may also be used for site acquisition, site improvements, demolition, relocation, and other necessary and reasonable activities related to the development of non-luxury housing. Funds may not be used for public housing development, public housing operating costs, or for Section 8 tenant-based assistance, nor may they be used to provide non-federal matching contributions for other federal programs, for operating subsidies for rental housing, or for activities under the Low-Income Housing Preservation Act. The HOME Program is administered by the County of Santa Clara Office of Supportive Housing on behalf of the Urban County cities and the Cities of Cupertino, Gilroy, and Palo Alto.
- **Low-Income Housing Preservation and Residential Home Ownership Act (LIHPRHA):** This program requires all eligible HUD Section 236 and Section 221(d) projects at risk of conversion to market-rate rentals from mortgage pre-payments be

subject to LIHPRHA incentives, which include subsidies to guarantee an eight percent annual return on equity.

- **Low-Income Housing Tax Credit:** Administered through the California Tax Credit Allocation Committee (TCAC), the Low-Income Housing Tax Credit (LIHTC) subsidizes the acquisition, construction, and rehabilitation of affordable housing by providing a tax credit to construct or rehabilitate affordable rental housing for low-income households.
- **Section 108 Loan Guarantee Program:** Allows CDBG entitlement jurisdictions to leverage their annual grant allocations to access low-cost financing for capital improvement projects. Eligible activities include housing, economic development, public facility, and infrastructure. This program is often used to catalyze private investment in underserved communities or as gap financing.
- **Section 202 Supportive Housing for the Elderly Program:** Provides an interest-free capital advance to cover the costs of construction, rehabilitation, or acquisition of very low-income senior housing. The program is available to private, nonprofit sponsors; public sponsors are not eligible for the program.
- **Section 811 Project Rental Assistance:** HUD offers long-term project-based rental assistance through a NOFA published by the California Housing Finance Agency (CalHFA).
- **U.S. Department of Agriculture (USDA) Housing Programs:** These programs provide homeownership opportunities for individuals and below market-rate loans/grants to public and nonprofit organizations for new construction, preservation, or rehabilitation of farmworker/rural multi-family rental housing.
- **Veterans Affairs Supportive Housing (VASH) Program:** HUD-VASH is a collaborative program between HUD and VA combines HUD housing vouchers with VA supportive services to help veterans who are homeless and their families find and sustain permanent housing.

Section G.2 Opportunities for Energy Conservation

The cost of energy can greatly impact housing affordability, as energy costs can constitute a significant portion of total housing costs. High energy costs also particularly impact low-income households that are less likely to have the ability to cover increased expenses.

The City encourages energy conservation in all projects consistent with the California Building Code (CBC) and Municipal Code Chapters 12.22 and 12.26 (Energy Code and California Green Building Standards Code, respectively). The City's website includes green building resources and informational handouts. Additionally, in 2013, the City adopted its Climate Action Plan (CAP). The CAP responds to the impacts of climate change through local actions that promote adaptation

and resilience by reducing greenhouse gas (GHG) emissions. This will be done by implementing policies that relate to transportation, energy use, resource conservation, green communities, and municipal operations. Moreover, the City is currently modifying its CAP to prepare a Climate Action and Adaptation Plan (CAAP) to update its greenhouse gas inventory and evaluate its sources of impact in order to determine implementation actions to reduce emissions.

The City promotes various energy conservation programs, including the Bay Area Regional Energy Network (BayREN) and Property Assessed Clean Energy (PACE) Financing. BayREN is a collaboration of the nine counties that comprise the San Francisco Bay Area. BayREN provides regional-scale energy efficiency programs, services, and resources. BayREN is funded by utility ratepayer funds through the California Public Utilities Commission and other sources. PACE is a mechanism for property owners to finance renewable energy, energy efficiency, and water conservation improvements to their properties and repay the loan via an annual assessment on the owner's property tax bill. This allows the financing to be extended over multiple years and also allows a home to be sold with that assessment assigned to the new owner. Unlike traditional forms of credit that are dependent on individual credit rating, PACE financing is primarily based on a property owner's equity in the building.

G.2.1 Silicon Valley Clean Energy Resources

Silicon Valley Clean Energy (SVCE) is a public, not-for-profit community choice aggregation (CCA) electricity provider that serves 13 communities within Santa Clara County, including Los Altos. SVCE provides residential and commercial electricity customers with clean, carbon-free electricity options at competitive prices from sources like solar, wind, and hydropower. SVCE sources the electricity, while PG&E delivers it over existing utility lines, and provides maintenance, billing, and customer service. SVCE has several programs designed to serve low-income customers, including:

- **Arrearage Management Plan (AMP):** The AMP is a 12-month program that provides up to $8,000 of bill forgiveness to each eligible customer that owes at least $500 on their electricity bill (or $250 for gas-only customers) for more than 90 days. To be eligible for AMP, customers must also ne enrolled in California Alternative Rates for Energy (CARE) or Family Electric Rate Assistance (FERA).
- **CARE (California Alternate Rates for Energy):** The CARE program provides a 20 percent discount or more on monthly bills for qualified low- or fixed-income households and housing facilities. Qualifications are based on the number of people living in the home and total annual household income.
- **FERA (Family Electric Rate Assistance):** Family Electric Rate Assistance provides an 18 percent discount on electricity bills for large households of three or more people with low- to middle-income. Qualifications are based on household income guidelines.

- **On-Bill Credit: COVID-19 Customer Relief:** SVCE provides a $100 credit for residential customers enrolled under California Alternative Rates for Energy (CARE) and Family Electric Rate Assistance as of May 10, 2020.
- **Medical Baseline Allowance:** SVCE Medical Baseline customers do not incur the typical Power Charge Indifference Adjustment (PCIA), a fee charge by PG&E, and therefore receive over 15 percent savings on their monthly electric bill. To qualify for Medical Baseline, a California-licensed physician must certify that a full-time resident in the home has a serious medical condition such being dependent on life-support equipment while at home.

G.2.2 Pacific Gas and Electric Resources

Pacific Gas and Electric (PG&E) also provides electricity service for Los Altos. PG&E assists low-income, disabled, and senior citizen customers through several programs and community outreach projects, including:

- **CARE (California Alternate Rates for Energy):** See CARE under Silicon Valley Clean Energy Resources, above.
- **FERA (Family Electric Rate Assistance):** See FERA under Silicon Valley Clean Energy Resources, above.
- **Energy Partners Program:** The Energy Partners Program provides qualified low-income customers free weatherization measures and energy-efficient appliances to reduce gas and electricity usage.
- **Medical Baseline Allowance:** See Medical Baseline Allowance under Silicon Valley Clean Energy Resources, above.
- **Relief for Energy Assistance through Community Help (REACH):** This is a one-time energy-assistance program sponsored by PG&E and administered through the Salvation Army from 170 offices in Northern and Central California. Those who have experienced an uncontrollable or unforeseen hardship may receive an energy grant of up to $300. Generally, recipients can receive REACH assistance only once within a 12-month period, but exceptions can be made for seniors, the physically challenged, and the terminally ill.

G.2.3 State Energy Resources

- **California Department of Community Services & Development Programs Low-Income Weatherization Program (LIWP):** California's Low-Income Weatherization Program (LIWP) provides low-income households with solar photovoltaic (PV) systems and energy efficiency upgrades at no cost to residents. LIWP is the only program of its kind in California that focuses exclusively on serving low-income households with solar

PV and energy efficiency upgrades at no cost. The program reduces greenhouse gas emissions and household energy costs by saving energy and generating clean renewable power. LIWP currently operates three program components: Multi-Family, Community Solar, and Farmworker Housing. According to CDS's Nov. 2020 Low-Income Weatherization Program Impact Report, LIWP has received $212 million from the Greenhouse Gas Reduction Fund since 2014. Note: The multi-family energy efficiency and renewables program component is estimated to end in June 2022.

- **California Public Utilities Commission Energy Savings Assistance Program (ESA)**: ESA provides no-cost weatherization services to low-income households who meet the CARE income guidelines. Services provided include attic insulation, energy efficient refrigerators, energy efficient furnaces, weatherstripping, caulking, low-flow showerheads, water heater blankets, and door and building envelope repairs which reduce air infiltration.

G.2.4 Federal Energy Resources

- **Federal Housing Administration Energy Efficient Mortgage Program (EEM):** This program helps families save money on their utility bills by enabling them to finance energy efficient improvements with their FHA-insured mortgage. The EEM program recognizes that an energy-efficient home will have lower operating costs, making it more affordable for the homeowners. Cost-effective energy improvements can lower utility bills and make more income available for the mortgage payment.
- **Low-Income Home Energy Assistance Program (LIHEAP):** The program is funded by the federal government and the State Department of Community Services & Development (CSD) administers LIHEAP. The federal Department of Health and Human Services distributes funds to states annually to assist with energy bills and offset heating and/or cooling energy costs for eligible low-income households. California's annual share is approximately $89 million which CSD distributes to contracted community energy service providers. Active. During March 2020, the CARES Act allocated California an additional $49 million to supplement its LIHEAP program, which totaled $203 million for Federal Fiscal Year 2019-2020.

LOS ALTOS HOUSING ELEMENT

1 North San Antonio Road
Los Altos, California 94022-3087

NOTICE OF INTENT TO ADOPT AN INITIAL STUDY-MITIGATED NEGATIVE DECLARATION

Notice is hereby given that an Initial Study–Mitigated Negative Declaration (IS-MND) has been prepared for the proposed 2023-2031 Housing Element in accordance with the provisions of the California Environmental Quality Act (CEQA), as set forth in the Public Resources Code, Sections 21000 to 21174, as amended. It is the intent of the City of Los Altos to adopt an Initial Study-Negative Declaration for proposed Housing Element.

Date: Wednesday, November 30, 2022

Lead Agency: City of Los Altos, 1 North San Antonio Road Los Altos, CA, 94022, (650) 947-2625

Project Title: City of Los Altos 2023-2031 Housing Element Update

City/County: City of Los Altos, Santa Clara County, CA

Public Review Period: A 30-day public review period will begin on November 30, 2022, and end on December 30, 2022, at 5:00 p.m. Please address comments to Nick Zornes, Development Services Director via email at nzornes@losaltosca.gov or by mail at 1 North San Antonio Road, Los Altos, CA, 94022 prior to the close of the comment period on December 30, 2022.

Availability of CEQA Document: Copies of the Draft Initial Study–Mitigated Negative Declaration are available for review at City offices located at 1 North San Antonio Road Los Altos, CA, 94022 and online at http://www.losaltosca.gov/development-services/page/environmental-documents and https://www.losaltoshousing.org.

Project Location: The City of Los Altos 2023-2031 Housing Element applies to the entirety of the City of Los Altos.

Project Description: The proposed project involves a comprehensive update to the Housing Element of the City of Los Altos General Plan. State law requires that housing elements be updated every eight years (California Government Code Sections 65580 to 65589.8). The Housing Element Update establishes goals, policies, and actions including rezoning of parcels and General Plan amendments, to meet the City's 6th Cycle Regional Housing Needs Allocation (RHNA). Los Altos' latest RHNA calls for 1,958 new housing units.

The proposed HEU does not propose any specific development and adoption of the proposed HEU would not approve any physical development (e.g., construction of housing or infrastructure). However, it envisions development including the proposed rezoning of sites for the potential development of additional housing units to meet the City's RHNA. Therefore, the CEQA analysis assumes that construction of housing is a reasonably foreseeable future outcome of the HEU. The buildout assumptions for use in this CEQA

document include 1,048 units that can be accommodated on undeveloped and underdeveloped sites and 600 units that can be accommodated through rezoning for a total of 1,648 units.

More information about the proposed project can be found on the City's website: https://www.losaltoshousing.org/

Environmental Determination: The City of Los Altos has completed an IS-MND for the proposed project. The IS-MND concluded that the project would have less-than-significant impacts or less than significant impacts with mitigation in the various topic areas required by CEQA Guidelines Appendix G, including Aesthetics, Agriculture/Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology/Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities/Service Systems, and Wildfire. As such, the City of Los Altos has determined that an Initial Study-Mitigated Negative Declaration is appropriate CEQA assessment.

Hazardous Waste Sites: Pursuant to Section 15087(c)(6) of the CEQA Guidelines, there are numerous sites on a list enumerated under Section 65962.5 of the Government Code in Los Altos.

Public Hearings: The City of Los Altos Planning Commission is anticipated to take public comments and consider the proposed Housing Element on **Thursday, January 5, 2023**. The meeting will start at **7:00 PM** and be held via video and teleconference only. Interested parties should check the Planning Commission website for information on how to join the meeting and to confirm the meeting date, time, and agenda: https://www.losaltosca.gov/planningcommission

The City Council is also anticipated to take public comments and consider the proposed Housing Element on **Tuesday, January 10, 2023,** and **Tuesday, January 24, 2023**. The meetings will start at **7:00 PM** and be held via video and teleconference only. Interested parties should check the City Council website for information on how to join the meeting and to confirm the meeting date, time, and agenda: https://www.losaltosca.gov/citycouncil

Nick Zornes, Development Services Director

Date

2023-2031 Housing Element Update

Initial Study – Mitigated Negative Declaration

prepared by

City of Los Altos
1 North San Antonio Road
Los Altos, California 94022
Contact: Nick Zornes, Development Services Director

prepared with the assistance of

Rincon Consultants, Inc.
445 15th Street, Suite 303
Oakland, California 94612

November 2022

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
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Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADU	accessory dwelling units
AMI	area median income
APN	Assessor's Parcel Number
BAAQMD	Bay Area Air Quality Management District
BERD	Built Environment Resource Directory
BFE	base flood evaluations
BMPs	best management practices
CAA	Clean Air Act
CAAP	Climate Action and Adaptation Plan
CAAQS	California Ambient Air Quality standards
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California's Green Building Standards Code
CalOSHA	California Occupational Safety and Health Administration
CARB	California Air Resources Board
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
Cal Water	California Water Service
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFCG	California Fish and Game Commission
CFR	Code of Federal Regulations
CHRIS	California Historical Resources Information System
CH_4	methane
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent

CRHR	California Register of Historical Resources
dB	decibel
DOC	California Department of Conservation
DOT	Department of Transportation
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
DUA	dwelling units per acre
EO	Executive Order
EPA	United States Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FHSZ	fire hazard severity zone
FHWA	United States Department of Transportation Federal Highway Administration
FTA	Federal Transit Administration
FUHSD	Fremont Union High School District
FWS	Fish and Wildlife Service
GHG	greenhouse gas
GPCD	gallons per capita per day
GSA	Valley Water Groundwater Sustainability Agency
GWh	gigawatt hours
GWP	global warming potential
HCD	California Department of Housing and Community Development
HEU	Housing Element Update
HFCs	hydrofluorocarbons
HFHSZ	high fire hazard severity zone
HMTA	Hazardous Materials Transportation Act
HRA	health risk assessment
HRI	Historic Resources Inventory
HWCL	Hazardous Waste Control Law
IPaC	Information for Planning and Consultation
IPCC	Intergovernmental Panel on Climate Change
IS-MND	Initial Study-Mitigated Negative Declaration
kWh	kilo-watts per hour
LAMC	Los Altos Municipal Code

LASD	Los Altos Elementary School District
LOS	level of service
LRA	local responsibility area
MERV	minimum efficiency reporting value
Mgd	million gallons per day
MLD	most likely descendent
MRP	municipal regional stormwater permit
MT	metric ton
MTC	Metropolitan Transportation Commission
MVLASD	Mountain View-Los Altos Union High School District
NAHC	Native American Heritage Commission
NAAQS	National Ambient Air Quality Standards
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OEHHA	California Office of Environmental Health Hazard Assessment
OHP	Office of Historic Preservation
OPR	Office of Planning and Research
PBDB	Paleobiology Database
PG&E	Pacific Gas and Electric
PDA	priority development area
PFCs	perfluorocarbons
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
PM_{10}	particulate matter less than 10 microns in diameter
PPV	peak particle velocity
PQS	professional qualification standards
PRA	paleontological resources assessment
PRC	Public Resources Code
RHNA	Regional Housing Needs Allocation
RMS	root mean squared
ROG	Reactive Organic Gases
RWQCB	Regional Water Quality Control Board

SB	Senate Bill
SCCFD	Santa Clara County Fire District
SCH	State Clearinghouse
SCVURPPP	Santa Clara Valley Urban Runoff Pollution Prevention Program
SCVWD	Santa Clara Valley Water District
SF_6	sulfur hexafluoride
SFBAAB	San Francisco Bay Area Air Basin
SFBRWQCB	San Francisco Bay Regional Water Quality Control Board
SFHA	special flood hazard areas
SIP	State Implementation Plan
SMP	Soil Management Plan
SRA	state responsibility area
SVCE	Silicon Valley Clean Energy
SVP	Society of Vertebrate Paleontology
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TDF	travel demand forecasting
TDM	Transportation Demand Management
TPA	Transit Priority Area
UCMP	University of California Museum of Paleontology
USFWS	United States Fish and Wildlife Service
USACE	U.S. Army Corp of Engineers
USEPA	U.S. Environmental Protection Agency
USGS	United States Geological Survey
UWMP	Los Altos Suburban District Urban Water Management Plan
VHFHSZ	very high fire hazard severity zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
VTA	Valley Transportation Authority
WEAP	Worker Environmental Awareness Program
WPCP	Sunnyvale water pollution control plant
WTP	water treatment plan

Initial Study

1. Project Title

City of Los Altos 2023-2031 Housing Element Update

2. Lead Agency Name and Address

City of Los Altos
1 North San Antonio Road
Los Altos, California 94022

3. Contact Person and Phone Number

Nick Zornes, Development Services Director, (650) 947-2625

4. Project Location and Setting

The City of Los Altos is located in the northwest portion of Santa Clara County, approximately five miles west of San Francisco Bay at the southern end of the peninsula. The regional location is shown in Figure 1.

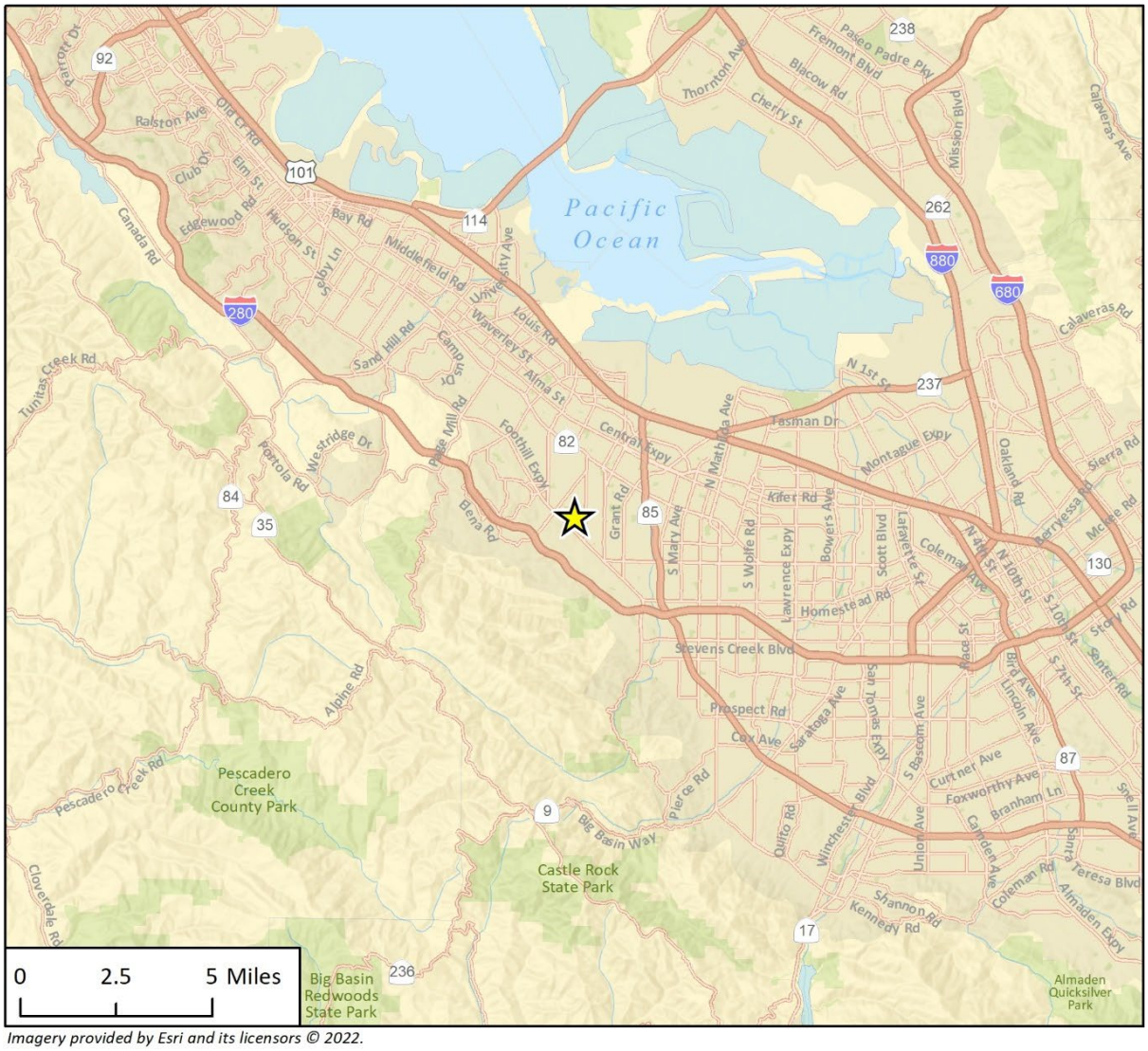
Los Altos encompasses approximately seven square miles. The Housing Element planning boundaries coincide with the City's limits, as depicted in Figure 2.

Los Altos is surrounded by Mountain View and Palo Alto to the north, Sunnyvale to the east, Cupertino to the south, and Los Altos Hills to the west. The city is bound by State Route 82 (SR 82) to the north, SR 85 to the east, and U.S. Interstate 280 (I-280) to the southwest, which provide regional access to the City.

Most of the city's urban development is residential, with small neighborhood commercial areas. Los Altos is served by seven small retail districts, primarily in the downtown area and on Foothill Expressway and El Camino Real.

Los Altos is located approximately 5 miles from the San Francisco Bay with an elevation of 150 feet or more above sea level. The majority of Los Altos is relatively flat terrain, with rolling terrain in the southwest portion of the city. Three creeks that flow north to San Francisco Bay traverse Los Altos: Adobe Creek on its western boundary, Stevens Creek on its eastern boundary, and Permanente Creek running through middle. All three creeks originate on the flanks of Black Mountain, located approximately 4 miles southwest of the city.

Figure 1 City of Los Altos Regional Location



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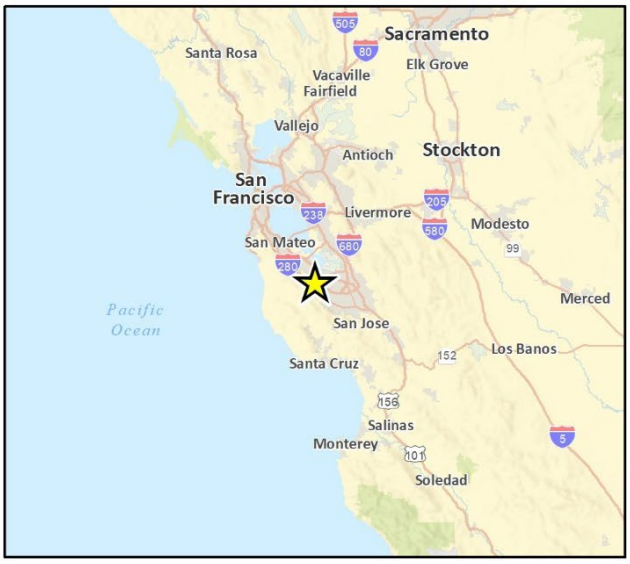
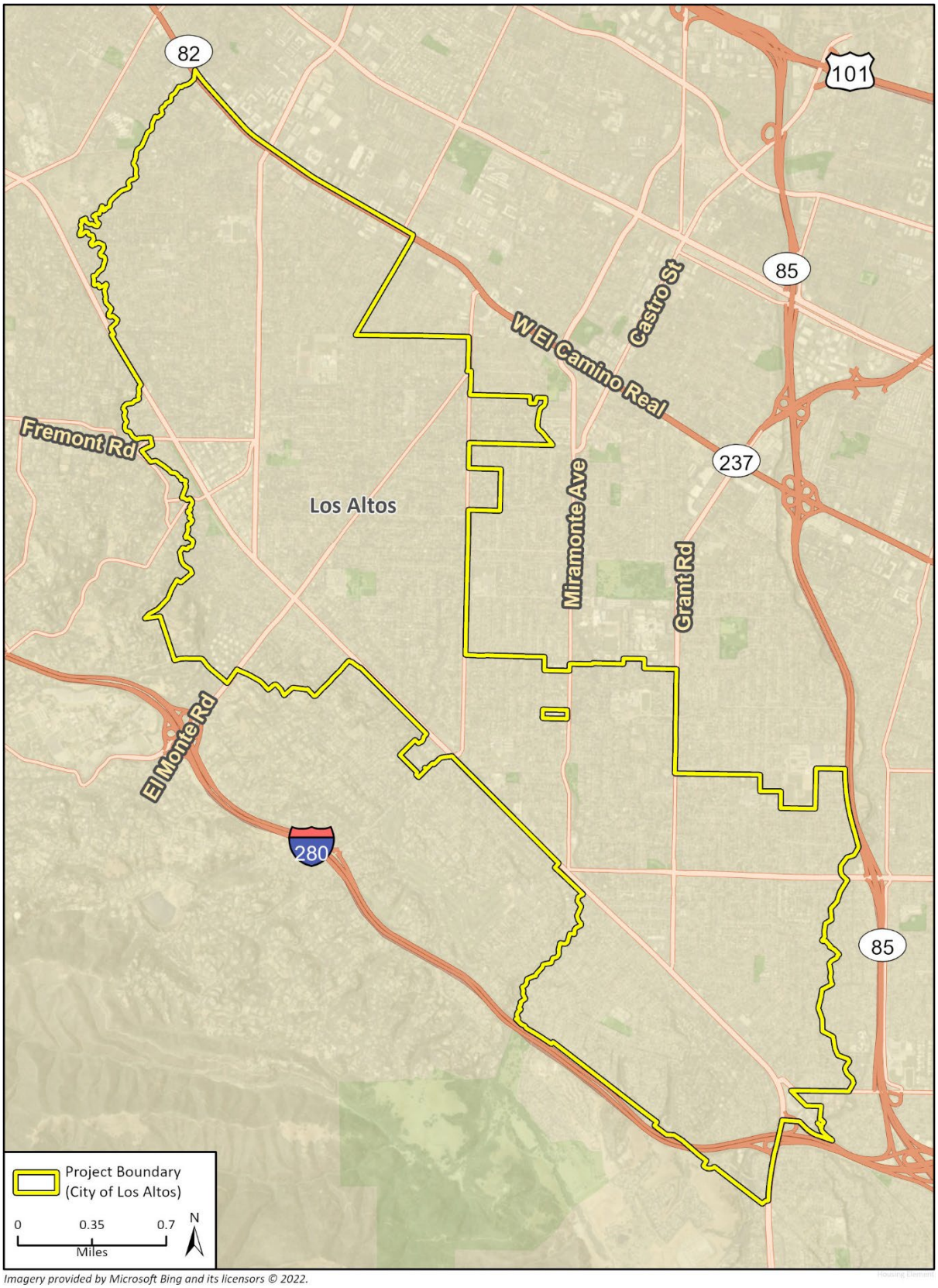


Figure 2 City of Los Altos Location



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5. Description of Project

The proposed 2023-2031 Housing Element Update (HEU), herein referred to as the "proposed HEU" or "proposed project," would amend the City of Los Altos' General Plan by replacing the current Housing Element with the proposed 2023-2031 Housing Element and amending the City's General Plan as needed for consistency and HEU implementation.

The Housing Element is one of the State-mandated elements of the General Plan. The current Housing Element was adopted in 2015 and is in effect through 2023. The Housing Element identifies the city's housing conditions and needs and establishes the policies and programs that comprise the city's housing strategy to accommodate projected housing needs, including the provision of adequate housing for low-income households and for special-needs populations (e.g., unhoused people, seniors, single-parent households, large families, and persons with disabilities).

The 2023-2031 Housing Element would bring the element into compliance with State legislation passed since adoption of the 2015-2023 Housing Element and with the current Association of Bay Area Governments' (ABAG's) Regional Housing Needs Allocation (RHNA). On December 16, 2021, the ABAG Executive Board adopted the 6th Cycle Final RHNA, which includes a "fair share" allocation for meeting regional housing needs for each community in the ABAG region.

The 2023-2031 Housing Element includes the following components, as required by State law:

- Assessment of the city's population, household, and housing stock characteristics, existing and future housing needs by household types, and special needs populations.
- Analysis of resources and constraints related to housing production and preservation, including governmental regulations, infrastructure requirements and market conditions such as land, construction, and labor costs as well as restricted financing availability.
- Identification of the city's quantified objectives for the 6th cycle RHNA and inventory of sites determined to be suitable for housing.
- Creation or maintenance of opportunities for energy conservation in residential development. State housing element law requires cities to identify opportunities for energy conservation in residential development.
- Review of the 2013-2021 Housing Element to identify progress and evaluate the effectiveness of previous policies and programs.
- A Housing Plan to address the city's identified housing needs, including housing goals, policies, and programs to facilitate the 2023 Housing Element Update (6th Cycle).

The draft Housing Element Update establishes objectives, policies, and programs to assist the City in achieving state-mandated housing goals. The City's implementation of these policies and programs includes future amendments to other elements of the General Plan (e.g., Land Use Element and Land Use/Zoning Map) and the rezoning of sites identified in the housing site inventory to meet the city's RHNA obligation.

Accommodation of the Regional Housing Needs Allocation (RHNA)

The Regional Housing Needs Allocation (RHNA) reflects the California Department of Housing and Community Development's (HCD's) determination of the projected housing needs in a region by household income level as a percent of the Area Median Income. ABAG was tasked with allocating the RHNA among the jurisdictions in the ABAG region, which includes the City of Los Altos.

Los Altos' RHNA for the current planning period is 1,958 units, which includes:

- 501 extremely low- and very low-income housing units,
- 288 low-income housing units,
- 326 moderate-income housing units,
- 843 above moderate-income housing units.

The heart of a housing element is an inventory of sites within the jurisdiction available for redevelopment to accommodate the jurisdiction's RHNA targets. If a jurisdiction does not have adequate available sites to accommodate its RHNA targets, then it is required to upzone land to sufficient densities to accommodate the targets. To assess options for accommodating its RHNA targets, the City compiled an inventory of candidate housing sites, which includes properties throughout Los Altos. Each site has undergone an assessment to determine development potential and residential unit capacity given existing zoning standards, potential capacity under new zoning regulations, and development trends.

Table 1 summarizes the City's plans for accommodating its RHNA targets. Of the required RHNA of 1,958 units, Los Altos can accommodate 322 units with accessory dwelling unit (ADU) projections[1] and 587 units with entitled and proposed projects. Based on the sites inventory, an additional 1,048 units can be accommodated with available undeveloped or underdeveloped sites. The "baseline sites" for the purposes of this analysis include undeveloped or underdeveloped sites that are included in the sites inventory. The baseline sites are listed in Table 2 and shown on Figure 3.

As shown in Table 1, without a rezoning program, Los Altos is one unit short of meeting the overall RHNA capacity and is 52 units short in the above-moderate income category.

Table 1 Residential Development Potential and RHNA – With Potential Rezoning

Site Category	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total Units
RHNA Required	**See Very Low**	**501**	**288**	**326**	**843**	**1,958**
Accessory Dwelling Units	See Very Low	16	97	161	48	322
Approved/Entitled Projects	22	77	30	38	420	587
RHNA Remaining Need	**See Very Low**	**386**	**161**	**127**	**375**	**1,049**
Sites Inventory	See Very Low/Low	557		168	323	1,048
Surplus/(Shortfall)	See Very Low/Low	**10**		**41**	**(52)**	**(1)**
Rezone Sites (Net New)	See Very Low/Low	**408**		**128**	**64**	**600**
Surplus/(Shortfall) with Rezone Sites	See Very Low/Low	**418**		**169**	**12**	**599**

Source: Adapted from Table III-1 of the proposed HEU

[1] This assumes a continuation of past trends and represents the number of ADUs anticipated to be constructed through 2031 even in the absence of the updated Housing Element.

Table 2 Baseline Sites

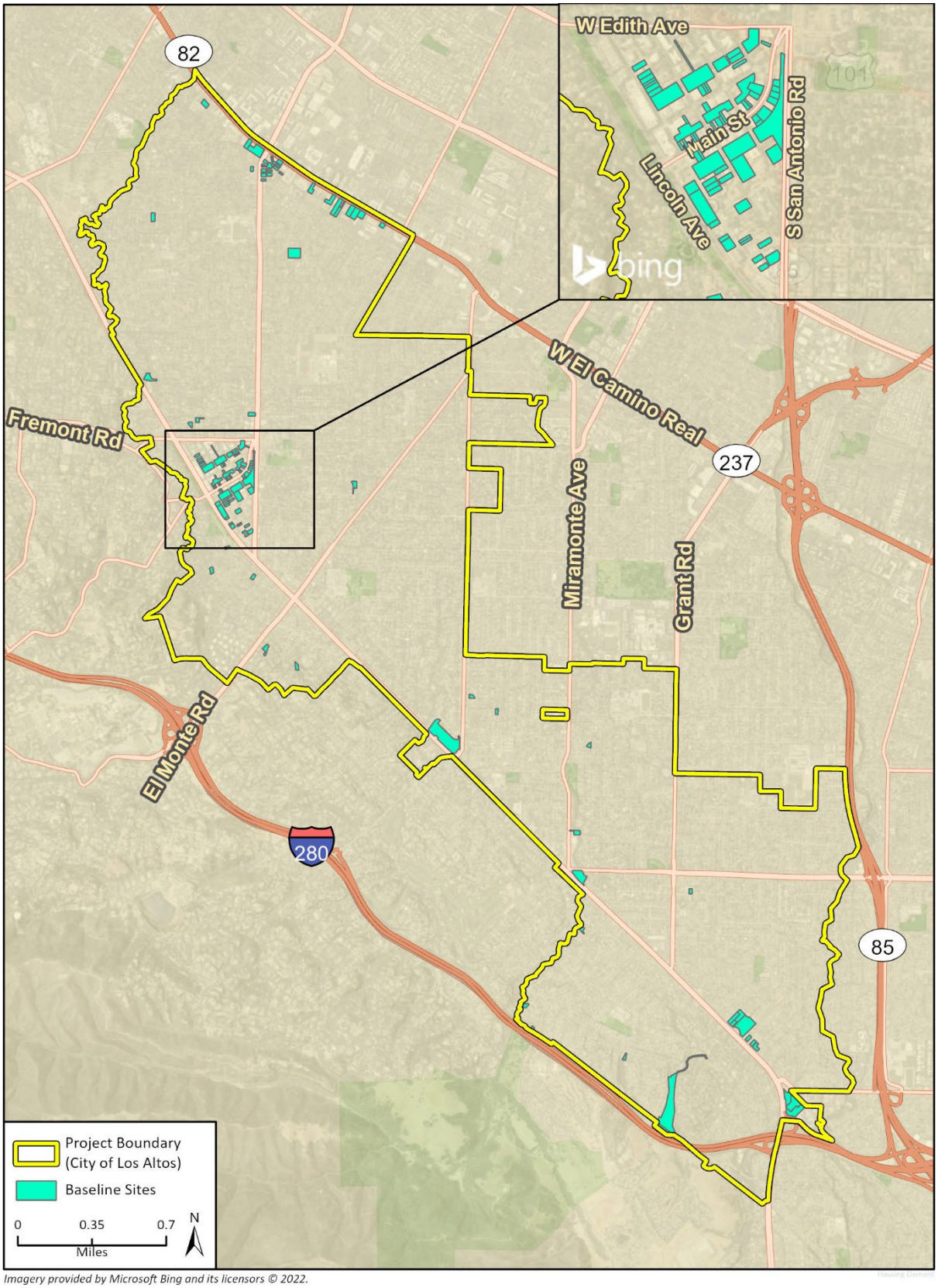
APN	Parcel Size (acres)	Existing Use	Existing Zoning	Potential Buildout (# of Units)
16710094	0.51	Commercial and surface parking	CT	16
17003084	0.54	Surface parking lot	CT	16
17002023	0.55	Individual retail stores	CT	17
16712045	0.56	Multiple or strip stores	CT	17
17004050	0.62	Fast food eatery	CT	19
17003077	0.69	Medical, dental, veterinary	CT	21
31816020	0.71	Commercial building and surface parking lot	CN	14
17064120	0.78	General office	CT	24
31816019	0.88	Supermarket with surface parking lot	CN	14
17064119	0.94	General office	CT	29
17003073	1.05	Restaurant and surface parking lot	CT	32
16712047	1.69	Commercial building and surface parking lot	CT	51
32601052	2.08	Shopping center with large surface parking lot	CN	57
32601053	2.94	Shopping center with large surface parking lot	CN	80
31816022	3.34	Supermarket with surface parking lot	CN	68
18956014	6.07	Strip mall with surface parking lot	CN	82
16741007	0.26	Offices or commercial with surface parking	CD/R3	11
16738020	0.28	Large building	CRS	4
16741065	0.29	Surface parking lot	CRS	4
17001088	0.29	Offices or commercial and surface parking lot	CN	8
31816011	0.30	Offices or commercial and surface parking lot	CN	8
16738008	0.30	Multiple or strip stores	CRS	4
17001047	0.31	Residential or commercial with surface parking	CN	8
31816009	0.31	Commercial building with surface parking	CN	8
17004065	0.31	Individual retail stores	CT	10
31816015	0.32	Auto service, garages, and surface parking	CN	9
16738038	0.34	Surface parking	CRS	5
31816008	0.44	Offices and surface parking lot	CN	12
16739057	0.57	Surface parking lot	CRS	8
16738029	0.58	Surface parking lot	CRS	8
16738028	0.58	Surface parking lot	CRS	8
16739069	0.60	Surface parking lot	CRS	8
16741003	1.00	Supermarket with surface parking lot	CRS	14
16739032	1.04	Surface parking lot	CRS	15
16739007	1.18	Surface parking lot	CRS	16
16739060	0.05	Restaurants, bars	CRS	1
16738024	0.05	Commercial and surface parking lot	CRS	1
16739105	0.05	Commercial	CRS	1

APN	Parcel Size (acres)	Existing Use	Existing Zoning	Potential Buildout (# of Units)
16739089	0.05	Commercial and surface parking lot	CRS	1
16739084	0.05	Commercial	CRS	1
16739085	0.05	Commercial and surface parking lot	CRS	1
17001029	0.05	Commercial and surface parking lot	CN	1
16739075	0.06	Commercial and surface parking lot	CRS	1
17001045	0.06	Surface parking lot	CN	2
16739091	0.06	Commercial	CRS	1
16739011	0.06	Restaurants, bars	CRS	1
16739012	0.06	Restaurants, bars	CRS	1
16740004	0.06	Commercial with surface parking lot	CRS	1
16738057	0.06	Office or church	CRS/OAD	1
16738053	0.06	Commercial or offices	CRS	1
17001036	0.07	Commercial and surface parking lot	CN	2
17001035	0.07	Surface parking lot	CN	2
16741021	0.07	Restaurant and surface parking lot	CD/R3	3
16741022	0.07	Office and surface parking lot	CD/R3	3
16739074	0.07	Commercial or office with surface parking	CRS	1
16739043	0.08	Auto service, garages	CD/R3	4
16739042	0.08	General office	CD/R3	4
17001030	0.08	Surface parking lot	CN	2
16738025	0.09	Bank and surface parking	CRS	1
16741006	0.10	Surface parking lot	CD/R3	4
16738052	0.10	Commercial/restaurant	CRS	1
16738013	0.10	Commercial stores	CRS	1
17001026	0.10	Dentist office and surface parking	CN	3
16738051	0.10	Surface parking lot	CRS	1
16738012	0.10	Commercial and restaurant	CRS	1
16741016	0.11	Surface parking lot	CD/R3	5
16739064	0.11	Stores	CRS	2
17001064	0.11	Offices	CN	3
16739076	0.11	Commercial and surface parking	CRS	2
17001042	0.12	Surface parking lot	CN	3
17001049	0.12	Surface parking lot	CN	3
16739097	0.12	Commercial	CRS	2
16740003	0.12	Commercial	CRS	2
16741018	0.12	Stores and surface parking	CD/R3	5
16741051	0.12	Commercial or office with surface parking	CD/R3	5
16738021	0.12	Office or commercial building with surface parking	CRS	2
16738011	0.13	Commercial building	CRS	2

APN	Parcel Size (acres)	Existing Use	Existing Zoning	Potential Buildout (# of Units)
17001023	0.14	Commercial and surface parking lot	CN	4
16740073	0.14	Parking for existing office buildings	CD	2
16738010	0.15	Commercial	CRS	2
16741054	0.16	Surface parking lot	CD	2
16740050	0.16	Commercial or industrial building	CD/R3	7
16740051	0.16	Auto service, garages	CD/R3	7
16740052	0.16	Auto service, garages	CD/R3	7
16740042	0.16	Surface parking lot	CD	2
16739045	0.16	Restaurants, bars	CD/R3	7
16739041	0.16	Restaurants with surface parking	CD/R3	7
16739040	0.16	Store and surface parking	CD/R3	7
16739044	0.16	Individual retail stores	CD/R3	7
16738050	0.16	Surface parking lot	CRS	2
16739127	0.17	Offices or commercial and surface parking	CD/R3	7
17516020	0.18	Surface parking lot	R1-10	1
16738049	0.18	Surface parking lot	CRS	3
17001043	0.18	Commercial or residential	CN	5
17001032	0.19	Restaurants, bars, and surface parking	CN	5
16716018	0.20	Surface parking lot	CT	6
17001027	0.21	Restaurant and surface parking	CN	6
34224058	0.22	Undeveloped land	R1-10	1
18918102	0.23	Undeveloped land	R1-10	1
31807008	0.23	Undeveloped lot	R1-10	1
17001051	0.23	Home or commercial building with surface parking	CN	6
17001086	0.23	Surface parking lot	CN	6
34205032	0.24	Undeveloped land	R1-10	1
16736068	0.24	Undeveloped land	R1-10	1
17001025	0.24	Offices or commercial with surface parking	CN	7
17516088	0.24	Undeveloped land	R1-10	1
19344033	0.24	Undeveloped land	R1-10	1
18919003	0.25	Undeveloped land	R1-10	1
17514021	0.29	Undeveloped land	R1-10	1
16736008	0.30	Undeveloped lot	R1-10	1
16741072	0.30	Restaurants, bars	CD	4
34210088	0.30	Undeveloped lot	R1-10	1
33603030	0.30	Undeveloped land	R1-10	1
16741046	0.33	General Office and surface parking	CD	5
34209045	0.35	Undeveloped lot	R1-10	1
16737034	0.36	Undeveloped lot	R1-10	1

APN	Parcel Size (acres)	Existing Use	Existing Zoning	Potential Buildout (# of Units)
17028058	0.45	Vacant flag lot	R1-10	1
19341039	0.45	Vacant flag lot	R1-10	1
16738065	0.46	Bank and surface parking lot	CD	6
16720050	0.46	Undeveloped lot	R1-10	1
33602008	0.48	Undeveloped lot	R1-H	1
16735076	0.72	Undeveloped lot	R1-10	1
16740056	0.80	Commercial building and surface parking lot	CD	11
16740039	1.06	Surface parking lot	CD	15
16740072	1.07	Commercial open space uses, public parking lots	CD	15
34204078	1.12	Undeveloped lot	R1-10	1
31801036	1.56	Medical, dental, veterinary with surface parking lot	CN	4
17012042	1.70	Church with surface parking lot	R1-10	5
16738002	2.03	Surface parking lot	CD	28
34204089	7.97	Potentially a school with a playground related to a church	R1-10	10
Total Baseline Sites				**1,048**

Figure 3 Baseline Sites Locations



To accommodate the remaining above moderate-income RHNA of 52 units, the Housing Element Update includes a program to rezone sufficient vacant land or land with redevelopment potential to provide capacity for this shortfall. Table 3 identifies potential parcels for rezoning to address this shortfall and provide excess capacity throughout the planning period. Excess capacity is recommended because of "no net loss" laws that require the City to update its inventory with additional sites to accommodate its RHNA targets if sites identified in the inventory ultimately develop with fewer units than anticipated and. The rezone sites are shown on Figure 4.

Separate programs detail specifics of various rezoning actions that would provide additional capacity for all income levels. Potential rezone of vacant and nonvacant parcels to allow higher residential densities and heights would accommodate 600 units.

Table 3 Rezone Sites

APN	Parcel Size	Existing Use	Existing Zoning	Proposed Zone	Potential Buildout (Number of Units)
18915088	0.09	Surface parking lot	CN	CN[1]	2
18915090	0.11	Offices and surface parking lot	CN	CN[1]	3
18915042	0.12	Office and surface parking	CN	CN[1]	3
18915026	0.12	Undeveloped land	CN	CN[1]	3
18915041	0.12	Restaurant and surface parking lot	CN	CN[1]	3
18915038	0.13	Office and surface parking	CN	CN[1]	4
18915059	0.17	Commercial and surface parking	CN	CN[1]	5
18915063	0.17	Offices or commercial and surface parking	CN	CN[1]	5
18915103	0.21	Medical, dental, veterinary and surface parking	CN	CN[1]	6
18915102	0.26	Offices or commercial with surface parking	CN	CN[1]	7
16710094	0.51	Commercial and surface parking	CT	CT[2]	4
17003084	0.54	Surface parking lot	CT	CT[2]	6
16716018	0.20	Surface parking lot	CT	CT[2]	2
17003083	0.20	General office	CT	CT[2]	8
17004065	0.31	Individual retail stores	CT	CT[2]	3
17002023	0.55	Individual retail stores	CT	CT[2]	5
17001055	0.56	General office	OA	OA/Overlay	11
17004045	0.56	General office	OA	OA/Overlay	11
16712045	0.56	Multiple or strip stores	CT	CT[2]	6
17041086	0.60	General office	OA	OA/Overlay	12
17004050	0.62	Fast food eatery	CT	CT[2]	6
17003077	0.69	Medical, dental, veterinary	CT	CT[2]	7
18915106	0.70	Bank and surface parking lot	CN	CN[1]	19
17040082	0.76	Mortuaries	OA	OA/Overlay	15
17064120	0.78	General office	CT	CT[2]	7
17039053	0.13	General office	OA	OA/Overlay	3
17038062	0.15	R-1 converted to office	OA	OA/Overlay	3
17041037	0.19	R-1 converted to office	OA	OA/Overlay	4
17041065	0.22	General office	OA	OA/Overlay	4

APN	Parcel Size	Existing Use	Existing Zoning	Proposed Zone	Potential Buildout (Number of Units)
17041068	0.24	General office	OA	OA/Overlay	5
17039058	0.24	General office	OA	OA/Overlay	5
17040072	0.26	General office	OA	OA/Overlay	5
17041014	0.28	General office	OA	OA/Overlay	6
18916006	0.32	Medical, dental, veterinary	OA	OA/Overlay	6
18916005	0.32	Medical, dental, veterinary	OA	OA/Overlay	6
18916017	0.32	Medical, dental, veterinary	OA	OA/Overlay	6
18916008	0.32	Medical, dental, veterinary	OA	OA/Overlay	6
18916004	0.33	Medical, dental, veterinary	OA	OA/Overlay	7
18916013	0.33	Medical, dental, veterinary	OA	OA/Overlay	7
18916016	0.33	Medical, dental, veterinary	OA	OA/Overlay	7
18916014	0.33	Medical, dental, veterinary	OA	OA/Overlay	7
18916009	0.34	Medical, dental, veterinary	OA	OA/Overlay	7
18916018	0.34	Medical, dental, veterinary	OA	OA/Overlay	7
18916012	0.34	Medical, dental, veterinary	OA	OA/Overlay	7
17040062	0.38	General office	OA	OA/Overlay	8
18916010	0.40	Medical, dental, veterinary	OA	OA/Overlay	8
18916003	0.42	Medical, dental, veterinary	OA	OA/Overlay	8
16716022	0.49	General office	OA	OA/Overlay	10
17042028	0.90	General office	OA	OA/Overlay	18
17064119	0.94	General office	CT	CT[2]	9
17041079	0.99	Bank, savings and loan	OA	OA/Overlay	20
17003073	1.05	Restaurant and surface parking lot	CT	CT[2]	10
31801036	1.56	Medical, dental, veterinary with surface parking lot	CN	CN[1]	39
16712047	1.69	Commercial building and surface parking lot	CT	CT[2]	16
18914081	1.85	Medical, dental, veterinary	OA	OA/Overlay	37
33609023	6.06	Churches	PCF	PCF/Overlay	15
33609018	6.50	Churches	PCF	PCF/Overlay	20
16712042	2.78	Specialty shopping centers (Town and Country Village, El Paseo de Saratoga)	R1-10	CT[2]	111
Total Rezone Sites					**600**

Some APNs are both baseline and rezone sites. The buildout assumptions for these rezone sites would be in addition to the allowable baseline units for particular APNs.

[1] The Loyola Corners Specific Plan (LCSP) will be amended to remove the 20-unit density cap. This affects parcels in the LCSP zoned CN (Program 1.E).

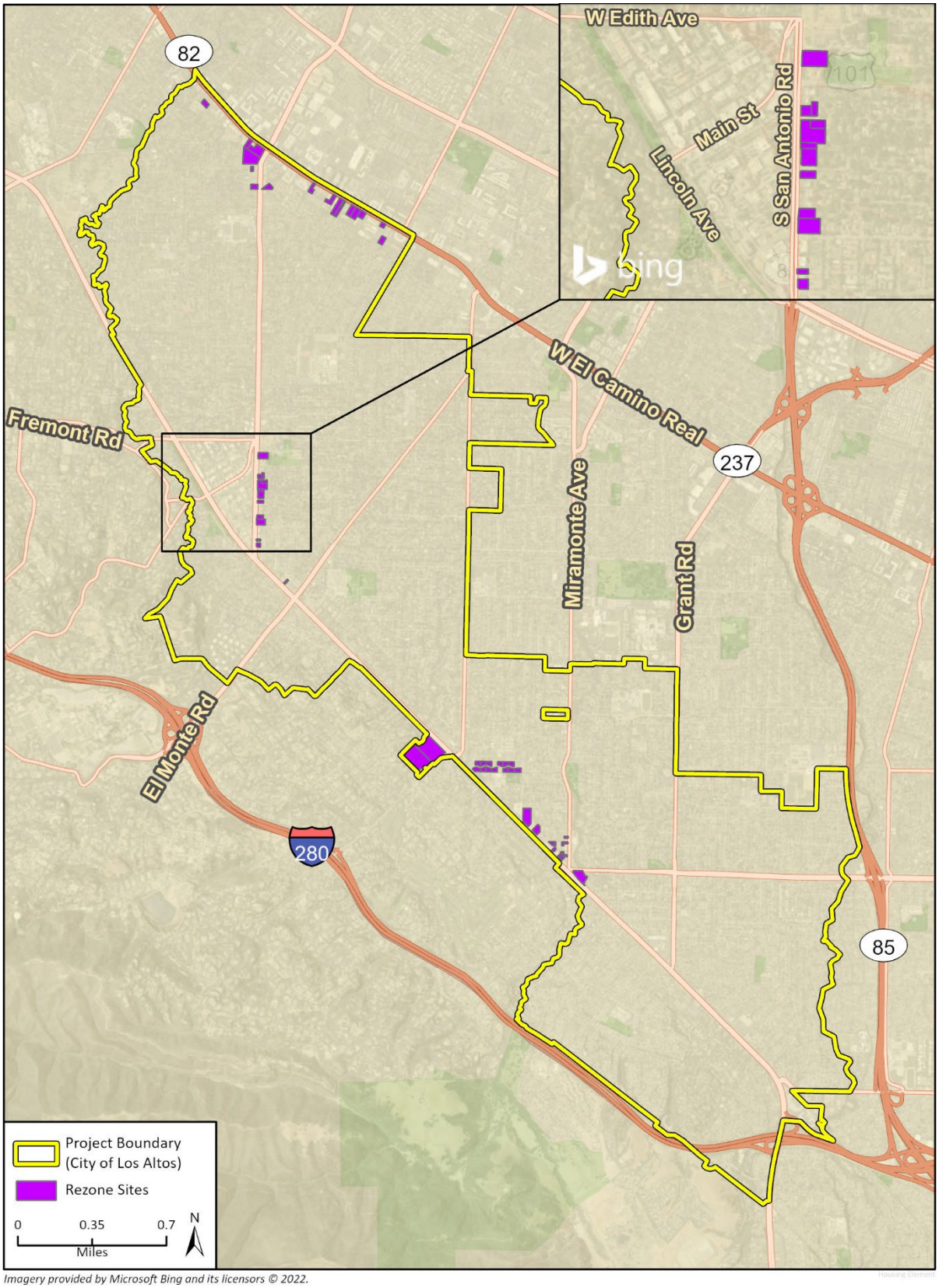
[2] The CT zone will be amended to remove or increase the density maximum and increase allowable height (Program 1.B).

The OA rezone sites will be amended to include an overlay to allow residential at a minimum of 20 dwelling units per acre (dua) and maximum of 30 dua (Program 1.C).

The two PCF rezone sites will have an overlay to allow residential at a minimum of 20 dua and maximum of 30 dua (Program 1.D).

The zoning for APN 16712042 will change from R1-10 to CT with the changes to CT noted above.

Figure 4 Rezone Sites Locations



Buildout Assumptions

The proposed HEU does not propose any specific development and adoption of the proposed HEU would not approve any physical development (e.g., construction of housing or infrastructure). However, it envisions development including the proposed rezoning of sites for the potential development of additional housing units to meet the City's RHNA. Therefore, this analysis assumes that construction of housing is a reasonably foreseeable future outcome of the HEU.

The buildout assumptions for use in this CEQA document include development of the baseline sites shown in Table 2 of 1,048 units plus the buildout associated with the rezones shown in Table 3 of 600 units, for a total of 1,648 units. Together, the baseline sites and rezone sites constitute the "housing inventory sites" for the purposes of this analysis.

According to the California Department of Finance, as of May 2022 there were an estimated 11,841 housing units in Los Altos. The HEU analyzes the development of up to 1,648 net additional units by 2031. If all units were to be permitted and built, there would be a total of 13,489 housing units in Los Altos by 2031. The pace of development is difficult to predict, but the inventory demonstrates more than sufficient capacity to meet the 6th cycle RHNA.

This analysis also accounts for potential increases in allowable height that could occur under the proposed HEU. Program 1.B of the proposed HEU would involve increasing the maximum height in the CT Zone (along El Camino Real) by 10 feet from 45 feet maximum height to 55 feet maximum height. In addition, Program 3.B of the proposed HEU would involve increasing the maximum allowable height in the CN Zone (Downtown area) by 10 feet from 30 feet maximum height to 40 feet maximum height.

Density Bonus

Residential projects proposed in the 2023-2031 Housing Element cycle may be eligible to use provisions of the State Density Bonus (California Government Code Sections 65915 – 65918). The State Density Bonus encourages the development of affordable and senior housing, including up to a 50 percent increase in project densities for most projects, depending on the amount of affordable housing provided, and up to an 80 percent increase in density for certain projects which are 100 percent affordable. The State Density Bonus also includes a package of incentives intended to help make the development of affordable and senior housing economically feasible. These include waivers and concessions, such as reduced setback, increased height or modified open space and other requirements.

Whether an individual project will use the State Density Bonus, or which aspects of State Density Bonus law an individual project would utilize, is difficult to predict. However, based on recent experience, multi-family residential projects in higher density residential and commercial zoning districts are most likely to utilize the State Density Bonus for concessions, such as increased height. The analysis in this document assesses a development potential greater than the projected housing need (RHNA); some of these units may be accommodated through State Density Bonus provisions, such as increased building height.

Zoning Ordinance Amendments

The project includes Housing Element programs that direct amendments to the Los Altos Municipal Code (LAMC) and the Los Altos Zoning Map. LAMC Chapters that would likely be amended include:

- Chapter 2.08, "City Commissions Generally"
- Chapter 14.02, Article 2, "Definitions"
- Chapter 14.04, "Zoning Districts Designated"
- Chapter 14.28, Article 2, "Density Bonus Ordinance"
- Chapter 14.34, "OA Office-Administrative District"
- Chapter 14.34, "OA-1/OA-4.5 Office-Administrative District"
- Chapter 14.40, "CN Commercial Neighborhood District"
- Chapter 14.44, "CD Commercial Downtown District"
- Chapter 14.48, "CRS Commercial Retail Sales District"
- Chapter 14.50, "CT Commercial Thoroughfare District"
- Chapter 14.52, "CD/R3 Commercial Downtown/Multiple Family District"
- Chapter 14.54, "CRS/OAD Commercial Retail Sales/Office-Administrative District"
- Chapter 14.74, "Off-Street Parking and Loading"
- Chapter 14.78, "Design and Transportation Review – Multiple-Family, Public and Community Facilities, Office and Administrative, and Commercial Districts"
- Chapter 14.80, "Use Permits"
- Residential zone chapters necessary for programs associated with allowing transitional and supportive housing, residential care facilities, and employee/farmworker housing.

Other General Plan Element Amendments

The Land Use Element is a guide for the city's future development. It designates the distribution and general location of land uses, such as residential, retail, industrial, open space, recreation, and public uses. The Land Use Element also addresses the permitted density and intensity of the various land use designations as reflected on the City's General Plan Land Use Map.

The Land Use Element likely would be amended to include modifications to land use classifications to maintain consistency with the policies and zoning amendments in the updated Housing Element. Additionally, the Community Design and Historic Resource Element likely would be modified to maintain consistency with the updated Housing Element.

6. Required Approvals

Implementation of the draft Housing Element Update would require the following discretionary actions by the City of Los Altos Planning Commission and/or City Council:

- Adoption of the 2023-2031 Housing Element

In addition, implementation of the draft Housing Element Update would require the following discretionary actions by the City of Los Altos Planning Commission and/or City Council either at the same time as the Housing Element is adopted or following adoption as policies and programs of the Housing Element are implemented:

- Adoption of a resolution amending the General Plan to update the Housing Element;
- Adoption of an ordinance (two readings) amending the City's zoning ordinance and the City's zoning map, and
- Adoption of a resolution making corresponding changes to the Land Use Element and General Plan Land Use Map and Community Design and Historic Resource Element required to preserve internal consistency and to reflect the location and density of land uses permitted by the Housing Element and City's zoning ordinance.

The 2023-2031 Housing Element will be submitted to HCD for review and comment prior to review and recommendation to the Planning Commission, followed by action by the City Council.

7. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

On March 10, 2022, the City of Los Altos contacted California Native American Tribal governments by sending a Senate Bill (SB) 18 and Assembly Bill (AB) 52 notification letters to tribes with an affiliation with the project area based on a list provided by the Native American Heritage Commission (NAHC). Under AB 52, Native American tribes have 30 days to respond and request further project information and request formal consultation. Under SB 18, Native American tribes have 90 days to respond and request further project information and request formal consultation. The City did not receive a request for formal consultation under AB 52 or SB 18. Therefore, no California Native American Tribes traditionally or culturally affiliated with the project area have requested consultation pursuant to Public Resources Code Section 21080.3.1 and Government Code Section 65352.3.

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources	■	Air Quality
■	Biological Resources	■	Cultural Resources	☐	Energy
■	Geology/Soils	☐	Greenhouse Gas Emissions	■	Hazards & Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
■	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	■	Transportation	■	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	■	Mandatory Findings of Significance

Determination

Based on this initial evaluation:

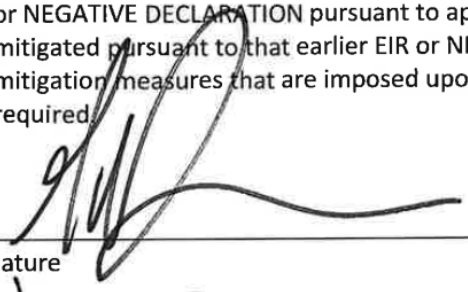
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to 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 "less than significant with mitigation incorporated" 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 potential 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

11/28/2022
Date

Nick Zornes
Printed Name

Director
Title

Environmental Checklist

1 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?	☐	☐	■	☐
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	■
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 a 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?	☐	☐	☐	■
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	■	☐

Environmental Setting

The City of Los Altos is largely built out with residential neighborhoods. The majority of Los Altos is relatively flat terrain, with rolling terrain in the southwest portion of the city. According to the Community Design and Historic Resources Element of the City's General Plan, the visual character of Los Altos is "an established low-density residential community with mature landscape and small neighborhood commercial areas." According to the General Plan, the distinctive design features of the city are:

- Relatively flat terrain with mature trees and landscape;
- Established low density residential neighborhoods, many having streets without sidewalks;
- Predominantly low profile, single-story structures throughout the community;
- Tree-lined collector and arterial streets leading to commercial and public activities;
- Vital Downtown core with village atmosphere created by contiguous storefronts, wide; sidewalks, and pedestrian plazas reflective of traditional historic commercial development; and,

- Smaller neighborhood commercial centers developed at a human scale that is pedestrian-friendly.

The City's General Plan does not identify specific scenic vistas, but rather lists the City's parks, open space, and creeks as its most valuable assets. Interstate 280 (I-280), an eligible State Scenic Highway (Caltrans 2019), traverses the southern portion of the City.

Regulatory Setting

Senate Bill 743 (California Public Resources Code Section 21099) passed in 2013, made changes to the CEQA for projects located in transit-oriented development areas. Among these changes are that a project's aesthetics impacts are no longer considered significant impacts on the environment if the project is a residential, mixed-use residential, or employment center project and if the project is located on an infill site within a transit priority area (TPA). Pursuant to Section 21099 of the California Public Resources Code, a "transit priority area" is defined in as an area within 0.5 mile of an existing or planned major transit stop. A "major transit stop" is defined in Section 21064.3 of the California Public Resources Code as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

According to the Association of Bay Area Governments (ABAG)/Metropolitan Transportation Commission (MTC) Transit Priority Area (TPA) Map (ABAG/MTC 2021), housing sites located along the El Camino Real corridor are within a TPA. Because implementation of the proposed rezoning would facilitate residential development on infill sites within a TPA, aesthetics impacts of development of those locations within a TPA may not be considered significant impacts on the environment. Therefore, this analysis focuses on portions of Los Altos where the proposed HEU facilitates new housing development not within a TPA.

Los Altos General Plan

The Land Use Element of the Los Altos General Plan includes the following goals and policies related to aesthetics:

Goal 2: Plan for a compatible and harmonious arrangement of land uses by providing a mix of uses consistent with projected future social and economic conditions in Los Altos.

Policy 2.3: Continue to conduct design review of residential and nonresidential development applications to ensure compatibility with surrounding property and neighborhoods.

Goal 3: Allow for intensification of development within the Downtown Core in keeping with the existing character of the area.

Policy 3.5: Continue to review development plans to ensure compliance with the Downtown Urban Design Plan.

Goal 4: Improve the land use mix along El Camino Real to ensure fiscal stability, encourage affordable housing, and to allow for development intensification along this corridor in a manner that is compatible with the adjacent residential neighborhoods and the local circulation system.

Policy 4.6: Continue to review development proposals to ensure a balance between development rights and impact on surrounding residential neighborhoods.

The Community Design and Historic Resources Element of the Los Altos General Plan includes the following goals and policies related to aesthetics:

Goal 1: Preserve and enhance the identity and unique character of Los Altos.

Policy 1.4: Promote pride in community and excellence in design in conjunction with attention to and compatibility with existing residential and commercial environments.

Policy 1.7: Enhance neighborhood character by promoting architectural design of new homes, additions to existing homes, and residential developments that is compatible in the context of surrounding neighborhoods.

Goal 5: Maintain and enhance the attractiveness of neighborhood shopping centers and businesses throughout the community.

Policy 1.4: Promote pedestrian-friendly site design, circulation, building orientation, parking, landscape, and site amenities (including pedestrian plazas, where feasible).

Impact Analysis

a. Would the project have a substantial adverse effect on a scenic vista?

A scenic vista is a view from a public place (roadway, designated scenic viewing spot, etc.) that is expansive and considered important. It can be obtained from an elevated position (such as from the top of a hillside) or it can be seen from a trail, park or roadway with a longer-range view of the landscape. A viewshed is an area of the landscape visible from a particular location or series of points (e.g., an overlook or a trail, respectively) (United States Department of Transportation Federal Highway Administration [FHWA] 2015). A viewshed may be divided into viewing distances called foreground, middle ground, and background. Usually, the closer a resource is to the viewer, the more dominant it appears visually, and thus it has greater importance to the viewer than something farther away. A common set of criteria identifies the foreground as 0.25 to 0.5 mile from the viewer; the middle ground is 3 to 5 miles away, and the background extends away to the horizon.

An adverse effect would occur if a proposed plan or project would block or otherwise damage the scenic vista upon implementation. Los Altos does not contain designated scenic views or scenic vistas. However, some areas of the city and some roadway corridors have background views of the hills on the western portion of the city and of Black Mountain.

The proposed HEU would facilitate increased density and height to accommodate the RHNA allocation in Los Altos. This would consist mostly of infill development, as Los Altos is largely built out. According to Program 1.B of the proposed HEU, allowable maximum height in the CT Zone (along El Camino Real) would be increased by 10 feet and Program 3.B of the proposed HEU would increase allowable height by 10 feet in the Downtown area. As shown on Figure 3 and Figure 4, the

housing inventory sites are largely concentrated along corridors (such as El Camino Real, Foothill Expressway, San Antonio Road) and in the Downtown. Any impact of proposed height increases in the absence of specific project proposals would be wholly speculative, and CEQA does not require a public agency to speculate about environmental impacts. Additionally, a height increase of 10 feet or one additional story along El Camino Real or in the Downtown compared to what is currently allowed would not substantially block views, as most views are already fully or intermittently impeded by mature trees and existing buildings. Although additional future development along roadway corridors could potentially block views from roadways due to increased height facilitated under the proposed HEU, many of these views are limited, are oriented away from background views of the hills, or are already fully or intermittently impeded by mature trees and buildings.

For the east-west oriented roadways, such as El Camino Real and Foothill Expressway, views of the hills to the southwest are already largely blocked by existing development, overhead transmission lines, and mature trees on private properties and beside roadways. For the north-south oriented roadways such as San Antonio Road, views of scenic resources are limited and already blocked by existing development and mature trees, and therefore the incremental increase of the scale of allowable development would not substantially block views. Overall, in the limited areas where views are available from public roadways, these views are already blocked by existing urban development and landscaping and an increase in that development would not directly or substantially block those views. Impacts to scenic vistas would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

There are no designated state scenic highways within or adjacent to the city. Therefore, development under the proposed HEU would not substantially damage scenic resources within a state scenic highway and there would be no impact.

Although there are no designated state scenic highways, as shown in Figure 3, two housing sites are located adjacent to or near I-280, an eligible State Scenic Highway, in the southern portion of Los Altos. I-280 is elevated through Los Altos and crosses through the city for approximately 1 mile, or approximately two minutes at freeway speeds. Existing views from I-280 are mostly of mature trees or retaining/sound walls surrounding the highway and rooftops of existing development. Therefore, views from I-280 are limited to views within the freeway corridor and expansive views of Los Altos are not available. Development on the two housing inventory sites adjacent to I-280 would not be visible from freeway motorists.

NO IMPACT

c. Would the project, 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 a 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?

Los Altos is a largely built-out, urbanized area surrounded by other urban communities to the north, east, and south, and open space and mountains to the west. As such, the following analysis focuses on whether the 2023-2031 Housing Element would conflict with applicable zoning and other regulations governing scenic quality. Scenic quality refers to the character of Housing Element's plan

area, in this case the Los Altos community, or existing development in the surrounding area and existing natural topography.

Consistency with the City of Los Altos General Plan

The Land Use Element and Community Design and Historic Resources Element of the City's existing General Plan contain implementing policies related to aesthetics. Those policies and the proposed HEU's consistency with those policies are shown below in Table 4.

Table 4 Project Consistency with the General Plan

Implementing Policy	Consistency
Land Use Element	
Policy 2.3: Continue to conduct design review of residential and nonresidential development applications to ensure compatibility with surrounding property and neighborhoods.	**Consistent.** Development facilitated by the project would be required to conform with applicable height, use, and intensity limits, as well as general design standards pursuant to LAMC Chapter 14.66. Future development would also be subject to the City's design review process pursuant to Section 14.78.020 of the LAMC, as applicable.
Policy 3.5: Continue to review development plans to ensure compliance with the Downtown Urban Design Plan.	**Consistent.** Development facilitated by the project in the Downtown Plan Area would be required to comply with the Downtown Urban Design Plan and Downtown Design Guidelines, where applicable, which outline guidelines and recommendations for improving the visual quality of the area. Future development may also be subject to the City's design review process.
Policy 4.6: Continue to review development proposals to ensure a balance between development rights and impact on surrounding residential neighborhoods.	**Consistent.** Development facilitated by the project would be required to conform with applicable height, use, and intensity limits for development, and would be subject to the City's design review process as applicable.
Community Design and Historic Resources Element	
Policy 1.4: Promote pride in community and excellence in design in conjunction with attention to and compatibility with existing residential and commercial environments.	**Consistent.** Development facilitated by the proposed HEU would be subject to the City's design review process as applicable.
Policy 1.7: Enhance neighborhood character by promoting architectural design of new homes, additions to existing homes, and residential developments that is compatible in the context of surrounding neighborhoods.	**Consistent.** Development facilitated by the proposed HEU would add new residences that would be subject to the City's design review process, as applicable, and LAMC Chapter 14.66.
Policy 5.2: Promote pedestrian-friendly site design, circulation, building orientation, parking, landscape, and site amenities (including pedestrian plazas, where feasible).	**Consistent.** Development facilitated by the proposed HEU in the Downtown would be located within transit priority areas and be designed to ensure transit is accessible, which would promote walkability.

Source: City of Los Altos 2002

Consistency with Los Altos Municipal Code

The City's Zoning Ordinance, Title 14 of the Los Altos Municipal Code (LAMC), aims to ensure a harmonious, convenient relationship among land uses and to conserve the City's natural beauty and preserve and enhance its distinctive physical character. The Zoning Ordinance sets forth regulations controlling the uses of land, the uses and locations of structures, the height and bulk of structures,

the open spaces about structures, the areas of sites in the districts, and the external appearance of structures in certain districts. Implementation of the proposed HEU would involve changes to the LAMC, as detailed under the Project Description, to encourage the development of housing; however, development facilitated by the project would be required to comply with zoning standards pertaining to the preservation of visual character. Development facilitated by the project would be reviewed by the City and evaluated for consistency with the City's Zoning Ordinance prior to approval. Therefore, the proposed HEU would be consistent with LAMC.

Consistency with Downtown Land Use Plan

A majority of the housing inventory sites are located within the Downtown Land Use Plan, which sets design guidelines in order to preserve and enhance the special qualities of the Downtown Los Altos village scale and character and serves to provide fairness and consistency in the City's downtown developmental review and approval process. Appendix II of the Downtown Land Use Plan provides Downtown design guidelines for architecture, landscaping, signage, building material, and appearance, and Appendix III provides a Downtown Design Plan to improve the visual quality of the Downtown Area. Development proposed on housing sites within the Downtown Land Use Plan Area would be subject to design standards within the Downtown Land Use Plan, as applicable under the plan and state planning and zoning laws. Conformance with requirements and guidelines established in this specific plan would further ensure that development facilitated by the proposed HEU would not conflict with the Downtown Land Use Plan.

Consistency with Sherwood Gateway Specific Plan

A few housing inventory sites are located within the Sherwood Gateway Specific Plan, which aims to provide a clear vision and direction for future development and improvements within the neighborhood with an emphasis on the maintenance of residential character and quality of life in the area. Chapter IV of the Sherwood Gateway Specific Plan includes land use and development standards while Chapter V sets forth guidelines for the design of appropriate development including architectural characteristics, site planning, parking, landscaping, and signs. Development proposed on housing sites within the Sherwood Gateway Specific Plan Area would be subject to the development standards and design guidelines as established by the specific plan, where applicable and subject to state planning and zoning laws. Conformance with the requirements of the specific plan would ensure that development facilitated by the proposed HEU would not conflict with the Sherwood Gateway Specific Plan.

Therefore, implementation of the proposed HEU would not conflict with the City's General Plan, Specific Plans, or LAMC. No impact with respect to the proposed HEU's impacts consistency with applicable zoning and other regulations governing scenic quality would occur.

NO IMPACT

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

For the purposes of this analysis, light refers to light emissions (brightness) generated by a source of light. Stationary sources of light include exterior parking lot and building security lighting; moving sources of light include the headlights of vehicles driving on roadways within Los Altos. Streetlights and other security lighting also serve as sources of light in the evening hours.

Glare is defined as focused, intense light emanated directly from a source or indirectly when light reflects from a surface. Daytime glare is caused in large part by sunlight shining on highly reflective surfaces at or above eye level. Reflective surfaces are associated with buildings that have expanses of polished or glass surfaces, light-colored walls or pavement, and the windshields of parked cars.

Los Altos is an urbanized area that is largely built out with residential, commercial, and public uses with commensurate levels of light and glare. New development facilitated by the proposed HEU would mostly occur as infill on or among already developed parcels within Los Altos along transportation corridors and in the Downtown. New lighting could occur on buildings for safety and in pedestrian walkways, and light could be emitted from interior sources through windows on upper stories of taller buildings. The main source of glare would likely be from the sun shining on vehicles and reflective or light-colored building materials and glazing.

Development facilitated by the proposed HEU would mainly occur as redevelopment of existing built sites or infill development of unused parcels between existing built sites. When facilities such as parking lots are replaced with buildings, these replacements may reduce nighttime sources of light, because parking lots are often more brightly lit at night than many buildings. Development of underutilized or vacant parcels may result in new light sources, but they would likely be congruous with nearby light sources (e.g., lighting from residential windows). Furthermore, as the development facilitated by the project would be residential, light from windows would be mostly filtered or obscured by window coverings. Light spillover from exterior residential lighting is typically blocked by adjacent structures or trees.

Further, the LAMC has requirements to reduce the potential for new or substantial sources of light pollution. Title 24 of the LAMC provides regulations concerning interior and exterior lighting and effects of glare for each zoning district. Pursuant to LAMC Title 24 for each zoning district, lighting within any lot that unnecessarily illuminates any other lot or substantially interferes with the use or enjoyment of the other lot is prohibited. Additionally, lighting shall be designed to minimize glare and intensity of external illumination and to respect the privacy of adjacent neighbors by avoiding direct and reflected illumination onto adjacent properties. Development facilitated by the proposed HEU would be required to conform with these standards, which would ensure that the project would not result in substantial or adverse new sources of light or glare.

Therefore, new residential development would be in existing residential neighborhoods or along corridors or in the Downtown area where sources of light and glare already exist. Accordingly, implementation of the proposed HEU would not create new sources of substantial light or glare that would adversely affect daytime or nighttime views in the area and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to 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 nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	■

Environmental Setting

The City of Los Altos is categorized as "Urban and Built-Up Land," according to maps prepared by the California Department of Conservation (DOC 2016a). The city does not contain farmland as defined in the Farmland Mapping and Monitoring Program.

Impact Analysis

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The City of Los Altos is categorized as "Urban and Built-Up Land;" there is no farmland as defined by the Department of Conservation in Los Altos. No proposed housing sites are located on or near Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the proposed project would not result in the conversion of Farmland to non-agricultural use. No impact would occur.

NO IMPACT

b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

The City of Los Altos is categorized as "Urban and Built-Up Land;" there is no farmland as defined by the Department of Conservation in Los Altos. No proposed housing sites are located on or near farmland. Furthermore, no parcels in Los Altos are currently enrolled in a Williamson Act contract (DOC 2016b). Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

NO IMPACT

c. Would the project 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. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

Los Altos is predominantly urbanized and does not contain forest or timberland resources according to the California Department of Fish and Wildlife (CDFW 2015). The City's zoning map indicates that there are no areas within Los Altos zoned for forestry, timberland, or timberland production. Therefore, the proposed HEU would not result in an impact related to the conversion or rezoning of forest land, timberland, or areas zoned for timberland production, and there would be no impact.

NO IMPACT

e. Would the project 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?

As discussed under checklist questions (a) through (d), there would be no impacts associated with agricultural or forest lands. The proposed HEU would not involve other changes in the existing environment that could result in the conversion of farmland to non-agricultural use or the conversion of forest land to non-forest use. No impact would occur.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
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?	☐	■	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	■	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	■	☐

Environmental Setting

Overview of Air Pollution

The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for "criteria pollutants" and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide (CO), volatile organic compounds (VOC)/reactive organic gases (ROG),[2] nitrogen oxides (NO_X), particulate matter with diameters of ten microns or less (PM_{10}) and 2.5 microns or less ($PM_{2.5}$), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROG and NO_X. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog).

[2] CARB defines VOC and ROG similarly as, "any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term ROG is used in this IS-MND.

Air pollutant emissions are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories:

- Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat.
- Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products.

Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and can also be divided into two major subcategories:

- On-road sources that may be legally operated on roadways and highways.
- Off-road sources include aircraft, ships, trains, and self-propelled construction equipment.

Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

Air Quality Standards and Attainment

Los Altos is located within the San Francisco Bay Area Air Basin (SFBAAB), which is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). As the local air quality management agency, BAAQMD is required to monitor air pollutant levels to ensure that the NAAQS and CAAQS are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the U.S. EPA classifies specific geographic areas as "attainment area" or "nonattainment area" for each pollutant. Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. BAAQMD is in nonattainment for the ozone NAAQS and CAAQS, the $PM_{2.5}$ NAAQS and CAAQS, and the PM_{10} CAAQS and is required to prepare a plan for improvement.[3] The health effects associated with criteria pollutants for which the Basin is in non-attainment are described in Table 5.

Table 5 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM_{10})	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma).

[3] Bay Area Air Quality Management District (BAAQMD). 2017a. BAAQMD CEQA Air Quality Guidelines. https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en (accessed July 2022).

Pollutant	Adverse Effects
Suspended particulate matter ($PM_{2.5}$)	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma.[1]

[1] More detailed discussion on the health effects associated with exposure to suspended particulate matter can be found in the following documents: EPA, Air Quality Criteria for Particulate Matter, October 2004.

Source: Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gases. Last updated April 2021. https://www.epa.gov/climate-indicators/climate-change-indicators-atmospheric-concentrations-greenhouse-gases (accessed July 2022).

The Bay Area 2017 Clean Air Plan (the 2017 Plan) provides a plan to improve Bay Area air quality and protect public health as well as the climate. The legal impetus for the 2017 Plan is to update the most recent ozone plan - the 2010 Clean Air Plan - to comply with state air quality planning requirements as codified in the California Health & Safety Code. Although steady progress in reducing ozone levels in the SFBAAB has been made, the region continues to be designated as non-attainment for both the one-hour and eight-hour ozone CAAQS. In addition, emissions of ozone precursors in the Bay Area contribute to air quality problems in neighboring air basins. Under these circumstances, state law requires the 2017 Plan to include all feasible measures to reduce emissions of ozone precursors.[4]

In 2006, the USEPA reduced the 24-hour $PM_{2.5}$ NAAQS regarding short-term exposure to fine particulate matter from 65 micrograms per cubic meter ($\mu g/m^3$) to 35 $\mu g/m^3$. Based on air quality monitoring data for the 2006-2008 cycle showing that the region was slightly above the standard, in December 2008 the USEPA designated the SFBAAB as non-attainment for the 24-hour $PM_{2.5}$ NAAQS. This triggered the requirement for the BAAQMD to prepare a State Implementation Plan (SIP) to demonstrate how the region would meet the standard. However, data for both the 2008-2010 and the 2009-2011 cycles showed that $PM_{2.5}$ levels in the SFBAAB currently meet the standard. On October 29, 2012, the USEPA issued a proposed rulemaking to determine that the SFBAAB now meets the 24-hour $PM_{2.5}$ NAAQS. The SFBAAB will continue to be designated as nonattainment for the 24-hour $PM_{2.5}$ NAAQS until such time as the BAAQMD elects to submit a "redesignation request" and a "maintenance plan" to the USEPA, and the USEPA approves the proposed redesignation.

Regulatory Setting

Los Altos General Plan

The Natural Environment and Hazards Element of the Los Altos General Plan includes the following goals and policies related to air quality:

Goal 8: Maintain or improve air quality in Los Altos.

Policy 8.1: Support the principles of reducing air pollutants through land use, transportation, and energy use planning.

Policy 8.2: Encourage transportation modes that minimize contaminant emissions from motor vehicle use.

[4] Bay Area Air Quality Management District (BAAQMD). 2017b. Final 2017 Clean Air Plan. https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf (accessed July 2022).

Policy 8.3: Interpret and implement the General Plan to be consistent with the regional Bay Area Air Quality Management Plan, as periodically updated.

Policy 8.4: Ensure location and design of development projects so as to conserve air quality and minimize direct and indirect emissions of air contaminants.

Los Altos Municipal Code

Title 14 of the LAMC states that any use that emits any air contaminant as defined by BAAQMD shall comply with applicable State standards concerning air pollution. Additionally, no use may generate any odor that reasonably may be found objectionable as determined by an appropriate agency such as the Santa Clara County health department and the Bay Area Air Quality Management District beyond the boundary occupied by the enterprise generating the odor. All mechanical, venting, and/or exhausting equipment that generates odors shall be located away from residential properties.

BAAQMD Significance Thresholds

This analysis uses the BAAQMD's May 2017 *CEQA Air Quality Guidelines* to evaluate air quality. The plan-level thresholds specified in the May 2017 BAAQMD *CEQA Air Quality Guidelines* were used to determine whether the proposed project impacts exceed the thresholds identified in *CEQA Guidelines* Appendix G.

Consistency with Air Quality Plan

Under BAAQMD's methodology, a determination of consistency with *CEQA Guidelines* thresholds should demonstrate that a project:

1. Supports the primary goals of the 2017 Clean Air Plan
2. Includes applicable control measures from the 2017 Clean Air Plan
3. Does not disrupt or hinder implementation of any 2017 Clean Air Plan control measures

Short-Term Emissions Thresholds

The BAAQMD's May 2017 *CEQA Air Quality Guidelines* have no plan-level significance thresholds for construction air pollutants emissions. However, they do include project-level screening and emissions thresholds for temporary construction-related emissions of air pollutants. These thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAAB's existing air quality conditions and are discussed in detail below (BAAQMD 2017a). Construction emissions associated with plan implementation are discussed qualitatively to evaluate potential air quality impacts.

The BAAQMD developed screening criteria in the 2017 *CEQA Air Quality Guidelines* to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant air quality impacts. The screening criteria for residential land uses are shown in Table 6.

Table 6 BAAQMD Criteria Air Pollutant Screening Levels

Land Use Type	Operational Criteria Pollutant Screening Size (du)	Construction Criteria Pollutant Screening Size (du)
Single-family	325 (NO_X)	114 (ROG)
Apartment, low-rise	451 (ROG)	240 (ROG)
Apartment, mid-rise	494 (ROG)	240 (ROG)
Apartment, high-rise	510 (ROG)	249 (ROG)
Condo/townhouse, general	451 (ROG)	240 (ROG)
Condo/townhouse, high-rise	511 (ROG)	252 (ROG)
Mobile home park	450 (ROG)	114 (ROG)
Retirement community	487 (ROG)	114 (ROG)
Congregate care facility	657 (ROG)	240 (ROG)

du = dwelling unit; NOX = oxides of nitrogen; ROG = reactive organic gases

Source: BAAQMD 2017a

If a project meets the screening criteria, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. These screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration (BAAQMD 2017a).

In addition to the screening levels above, several additional factors are outlined in the 2017 *CEQA Air Quality Guidelines* that construction activities must satisfy for a project to meet the construction screening criteria:

- All basic construction measures from the 2017 *CEQA Guidelines* must be included in project design and implemented during construction
- Construction-related activities would not include any of the following:
  - Demolition
  - Simultaneous occurrence of more than two construction phases (e.g., paving and building construction would occur simultaneously)
  - Simultaneous construction of more than one land use type (e.g., project would develop residential and commercial uses on the same site) (not applicable to high density infill development)
  - Extensive material transport (e.g., greater than 10,000 cubic yards of soil import/export) requiring a considerable amount of haul truck activity

For projects that do not meet the screening criteria above, the BAAQMD construction significance thresholds for criteria air pollutants, shown in Table 7, are used to evaluate a project's potential air quality impacts.

Table 7 BAAQMD Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds Average Daily Emissions (lbs/day)	Operational Threshold Average Daily Emissions (lbs/day)	Operational Threshold Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO_X	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	Not Applicable

lbs = pounds; NO_X = oxides of nitrogen; ROG = reactive organic gases; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns

Source: BAAQMD 2017a

For all projects in the SFBAAB, the BAAQMD 2017 *CEQA Air Quality Guidelines* recommends implementation of the Basic Construction Mitigation Measures listed in Table 8-2 of the Guidelines (BAAQMD 2017b). For projects that exceed the thresholds in Table 7, the BAAQMD 2017 *CEQA Air Quality Guidelines* recommends implementation of the Additional Construction Mitigation Measures listed in Table 8-3 of the Guidelines (BAAQMD 2017a).

Operation Emissions Thresholds

The BAAQMD's 2017 *CEQA Air Quality Guidelines* contain specific operational plan-level significance thresholds for criteria air pollutants. Plans must show the following over the planning period:

- Consistency with current air quality plan control measures, and
- Vehicle miles traveled (VMT) or vehicle trips increase is less than or equal to the plan's projected population increase.

If a plan can demonstrate consistency with both criteria, then impacts would be less than significant. The current air quality plan is the 2017 Clean Air Plan.

For project-level thresholds, the screening criteria for operational emissions are shown in Table 6. For projects that do not meet the screening criteria, the BAAQMD operational significance thresholds for criteria air pollutants, shown in Table 7, are used to evaluate a project's potential air quality impacts.

Carbon Monoxide Hotspots

BAAQMD provides a preliminary screening methodology to conservatively determine whether a proposed project would exceed CO thresholds. If the following criteria are met, a project would result in a less than significant impact related to local CO concentrations:

1. The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.
2. Project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.

3. Project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

Toxic Air Contaminants

For health risks associated with TAC and $PM_{2.5}$ emissions, the BAAQMD May 2017 CEQA Air Quality Guidelines state a project would result in a significant impact if the any of the following thresholds are exceeded (BAAQMD 2017b):

- Non-compliance with Qualified Community Risk Reduction Plan;
- Increased cancer risk of > 10.0 in a million;
- Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute); or
- Ambient $PM_{2.5}$ increase of > 0.3 µg/m^3 annual average

Odors

The BAAQMD provides minimum distances for siting of new odor sources shown in Table 8. A significant impact would occur if the project would result in other emissions (such as odors) affecting substantial numbers of people or would site a new odor source as shown in Table 8 within the specified distances of existing receptors.

Table 8 BAAQMD Odor Source Thresholds

Odor Source	Minimum Distance for Less than Significant Odor Impacts (in miles)
Wastewater treatment plant	2
Wastewater pumping facilities	1
Sanitary Landfill	2
Transfer Station	1
Composting Facility	1
Petroleum Refinery	2
Asphalt Batch Plant	2
Chemical Manufacturing	2
Fiberglass Manufacturing	1
Painting/Coating Operations	1
Rendering Plant	2

Source: BAAQMD 2017a

Methodology

Construction Emissions

Construction-related emissions are temporary but may still result in adverse air quality impacts. Construction of development facilitated by the project would generate temporary emissions from three primary sources: the operation of construction vehicles (e.g., scrapers, loaders, dump trucks, etc.); ground disturbance during site preparation and grading, which creates fugitive dust; and the application of asphalt, paint, or other oil-based substances.

At this time, there is not sufficient detail to provide analysis of individual construction projects that would be facilitated by the project, and thus it would be speculative to analyze project-level impacts. Rather, consistent with the programmatic nature of the project, construction impacts for the project are discussed qualitatively and emissions are not compared to the project-level thresholds.

Operation Emissions

Based on plan-level guidance from the BAAQMD 2017 *CEQA Air Quality Guidelines,* long-term operational emissions associated with implementation of the proposed project are discussed qualitatively by comparing the proposed project to the 2017 Clean Air Plan goals, policies, and control measures. In addition, comparing the rate of increase of plan VMT and population is recommended by BAAQMD for determining significance of criteria pollutants. If the proposed project does not meet either criterion then impacts would be potentially significant.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Project Consistency with the Current Air Quality Plan

A project that supports the goals within the 2017 Clean Air Plan would be consistent with the 2017 Clean Air Plan. Consistency with BAAQMD quantitative thresholds is interpreted as demonstrating support for the 2017 Clean Air Plan goals. Assumed buildout under the proposed HEU involves a net increase of 1,648 residential units mainly located within the Downtown Land Use Plan Area which is a Priority Development Area (PDA).[5] Inventory sites are also located in the Sherwood Gateway Specific Plan Area and along transportation corridors within the city, which would encourage denser housing on sites in proximity to services, transit, and bicycle routes. By allowing for the easier use of alternative modes of transportation, the proposed HEU could reduce the use of personal vehicles and subsequent mobile emissions than if the residential units were placed farther from transit. As shown in the VMT analysis memorandum prepared by Hexagon Transportation Consultants, included in Appendix A (Hexagon Transportation Consultants 2022a), the proposed HEU would reduce VMT per resident by 0.17 VMT compared to VMT per resident without implementation of the HEU. In addition, development facilitated by the project would be required to comply with the latest Title 24 regulations, including requirements for residential indoor air quality. The analysis is based on compliance with 2019 Title 24 requirements although individual projects developed under the plan would be required to comply with the most current version of Title 24 at the time of project construction. These requirements currently mandate Minimum Efficiency Reporting Value (MERV)-13 (or equivalent) filters for heating/cooling systems and ventilation systems in residences (Section 150.0[m]) or implementation of future standards that would be anticipated to be equal to or more stringent than current standards. Therefore, the project would improve air quality compared to development farther from transit and services through reducing VMT and would protect public health through stringent requirements for MERV-13 filters or equivalent indoor air quality measures, which would be consistent with the primary goals of the 2017 Clean Air Plan.

The 2017 Clean Air Plan includes 85 control measures under the following sectors: stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Many of these measures are industry-specific and would not be applicable to development facilitated by the proposed HEU (e.g., stationary sources,

[5] PDAs are places near public transit planned for new homes, jobs, and community amenities. All PDAs are created and planned by local governments, which nominate eligible areas to ABAG for adoption (ABAG 2022).

agriculture, and natural and working lands). Measures from transportation, energy, building, water, waste, and super-GHG pollutants sectors are focused on larger-scale planning efforts (e.g., transit funding, utility energy procurement, regional energy plans) and would not directly apply to development facilitated by the proposed HEU. Table 9 shows project consistency with applicable control measures from the 2017 Clean Air Plan.

Table 9 Project Consistency with Applicable 2017 Clean Air Plan Control Measures

Control Measures	Consistency
Transportation	
TR9: Bicycle and Pedestrian Access and Facilities. Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.	**Consistent**: The proposed HEU would facilitate development of housing within the city's Priority Development Area (the Downtown area), as well as the Sherwood Gateway Specific Plan Area and near or adjacent to transportation corridors currently served by Class II and Class III bicycle lanes such as San Antonio Road and Foothill Expressway, which would encourage the use of bicycles and reduce reliance on single-occupancy vehicles. Future residents would also be able to utilize bicycle parking facilities around the city which would encourage residents to bicycle and walk to transit and services (City of Los Altos 2012).
Energy	
EN2: Decrease Electricity Demand. Work with local governments to adopt additional energy-efficiency policies and programs. Support local government energy efficiency program via best practices, model ordinances, and technical support. Work with partners to develop messaging to decrease electricity demand during peak times.	**Consistent.** Development facilitated by the project would be required to comply with the LAMC Chapter 12.22, which mandates the implementation of Title 24. Compliance would include complying with the most updated rooftop solar requirements at the time of construction. Future development would also be required to comply with the City's Reach Code which is currently being revised, but would require all-electric construction for all newly constructed buildings. Electricity would be provided either by Silicon Valley Clean Energy (SVCE) or PG&E, which are required to generate electricity that would increase renewable energy resources to 60 percent by 2030 and 100 percent by 2045. As the City's main electricity provider, SVCE enrolls new customers in their GreenStart program, which sources 50 percent of electricity from renewable energy sources and 50 percent from carbon-free sources. Customers have the option to upgrade to SVCE's GreenPrime program which sources 100 percent of electricity from renewable energy sources (SVCE 2022).
Buildings	
BL1: Green Buildings. Collaborate with partners such as KyotoUSA to identify energy-related improvements and opportunities for on-site renewable energy systems in school districts; investigate funding strategies to implement upgrades. Identify barriers to effective local implementation of the CALGreen (Title 24) statewide building energy code; develop solutions to improve implementation/enforcement. Work with ABAG's BayREN program to make additional funding available for energy-related projects in the buildings sector. Engage with additional partners to target reducing emissions from specific types of buildings.	**Consistent**: Development facilitated by the project would be required to comply with the energy and sustainability standards of Title 24 (including the California Energy Code and CALGreen) and the City's associated amendments that are in effect at that time. For example, the current 2019 CALGreen standards and the LAMC Chapter 6.14 require a minimum of 65 percent diversion of construction and demolition debris. New low-rise residential buildings would also be required to install solar photovoltaic (PV) panels. The Title 24 standards are updated every three years and become increasingly more stringent over time. Future development would also be required to comply with the City's Reach Code which would require all-electric construction for all newly constructed buildings.

Control Measures	Consistency
Water	
WR2: Support Water Conservation. Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	**Consistent**: Future development that needs new or expanded water service would be required to comply with the California Water Service Company's and CALGreen's water efficiency regulations, and the state's Model Water Efficiency Landscape Ordinance to reduce indoor and outdoor water use.

Source: BAAQMD 2017b

As shown in Table 9, the project would be consistent with the applicable measures as development facilitated by the project would be required to comply with the latest Title 24 regulations and would increase density in Downtown and along transportation corridors, allowing for greater use of alternative modes of transportation. Development facilitated by the project would not contain elements that would disrupt or hinder implementation of a 2017 Clean Air Plan control measures. Therefore, the project would be consistent with the 2017 Clean Air Plan.

Project VMT and Population Growth

According to the BAAQMD 2017 *CEQA Air Quality Guidelines,* the threshold for criteria air pollutants and precursors includes an assessment of the rate of increase of plan VMT versus population growth. As discussed above under Environmental Setting, to result in a less than significant impact, the analysis must show that the project's projected VMT increase would be less than or equal to its projected population increase. Put another way, the project's projected VMT per resident must be less than what would occur without the project. As shown in Table 27 in Section 17, *Transportation*, 2031 conditions without the project would involve a VMT per resident of 12.85 whereas 2031 conditions with the project would result in VMT per resident of 12.71. Therefore, compared to 2031 without the project, the proposed HEU would reduce VMT per resident. Therefore, the project's VMT increase would not conflict with the BAAQMD's 2017 *CEQA Air Quality Guidelines* operational plan-level significance thresholds for criteria air pollutants and would be consistent with the 2017 Clean Air Plan. Accordingly, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project 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?

Construction

Development facilitated by the proposed HEU would involve activities that result in air pollutant emissions. Construction activities such as demolition, grading, construction worker travel, delivery and hauling of construction supplies and debris, and fuel combustion by on-site construction equipment would generate pollutant emissions. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants, particularly during site preparation and grading. The extent of daily emissions, particularly ROGs and NO_X emissions, generated by construction equipment, would depend on the quantity of equipment used and the hours of operation for each project. The extent of $PM_{2.5}$ and PM_{10} emissions would depend upon the following factors: 1) the amount of disturbed soils; 2) the length of disturbance time; 3) whether existing structures are demolished; 4) whether excavation is involved; and 5) whether transporting

excavated materials offsite is necessary. Dust emissions can lead to both nuisance and health impacts. According to the 2017 BAAQMD *CEQA Air Quality Guidelines,* PM_{10} is the greatest pollutant of concern during construction (BAAQMD 2017a).

As discussed above under BAAQMD Significance Thresholds, BAAQMD's 2017 *CEQA Air Quality Guidelines* have no plan-level significance thresholds for construction air pollutant emissions that would apply to the project. However, the guidelines include project-level thresholds for construction emissions. If an individual project's construction emissions fall below the project-level thresholds, the project's impacts on regional air quality would be individually and cumulatively less than significant. Mitigation Measure AQ-1 would require future development that does not meet the BAAQMD construction screening criteria under Table 6 to conduct individual air quality analysis and compare emissions to BAAQMD significance thresholds as detailed under Table 7, and to implement mitigation measures to reduce emissions.

Construction of development envisioned under the project would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution concentrations or air quality nuisances. Therefore, construction air quality impacts would be potentially significant. Furthermore, site preparation and grading during construction activities facilitated by development under the proposed project may cause wind-blown dust that could contribute particulate matter into the local atmosphere. The BAAQMD has not established a quantitative threshold for fugitive dust emissions but rather states that projects that incorporate best management practices (BMPs) for fugitive dust control during construction would have a less-than-significant impact related to fugitive dust emissions. The BAAQMD has identified feasible fugitive dust control measures for construction activities. These Basic Construction Mitigation Measures are recommended for all projects (BAAQMD 2017a). In addition, the BAAQMD and CARB have regulations that address the handling of hazardous air pollutants such as lead and asbestos, which could be aerially disbursed during demolition activities. BAAQMD rules and regulations address both the handling and transport of these contaminants. Implementation of Mitigation Measure AQ-2 would be required to ensure incorporation of BAAQMD Basic Construction Mitigation Measures to reduce temporary construction impacts and fugitive dust emissions. Every use in the City is also mandated to comply with rules, regulations, and standards of the BAAQMD pursuant to Policy NEH 29 of the Los Altos General Plan Natural Environment and Hazards Element. Construction activities from development facilitated under the project may also potentially result in a cumulatively considerable net increase in criteria pollutants, which would be addressed by Mitigation Measure AQ-2.

Operation

According to the BAAQMD 2017 *CEQA Air Quality Guidelines,* the threshold for criteria air pollutants and precursors requires an assessment of the rate of increase of plan VMT and population. As discussed under checklist question (a), the VMT per resident in Los Altos would decrease with the proposed HEU compared to conditions without the HEU. VMT increases at a lower percentage because the proposed project would change land uses to concentrate growth and residences to jobs and services to reduce singular vehicle trips and encourage alternative models of travel. Therefore, impacts concerning criteria pollutants generated from operation of the project would be less than significant.

Although operational impacts from emissions of criteria pollutants would be less than significant, future projects that do not satisfy the BAAQMD operational screening criteria as shown in Table 6 would also be required to implement Mitigation Measure AQ-1, which would ensure emissions from individual projects are reduced to below thresholds detailed under Table 7.

Mitigation Measures

The following mitigation measures are required:

AQ-1 Individual Air Quality Analysis

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

> *For individual projects subject to CEQA that do not meet the BAAQMD construction and/or operational screening criteria under Table 6, individual air quality analysis shall be conducted to determine project significance. Where individual projects exceed BAAQMD significance thresholds detailed under Table 7, mitigation measures shall be incorporated to reduce emissions to below thresholds. Construction mitigation measures may include, but are not limited to, incorporation of Tier 4 and/or alternative fueled equipment, use of onsite power sources instead of generators, and use of low/no-VOC content architectural coatings. Operational mitigation measures may include, but are not limited to, increased incorporation of photovoltaic systems (PV) beyond regulatory requirements, increased incorporation of EV charging stations and/or infrastructure beyond regulatory requirements, incorporation of a development-wide ride-share system, or elimination of natural gas usage within residential developments. Individual project analysis and accompanying emission-reduction measures shall be approved by the City prior to issuance of a permit to construct or permit to operate.*

AQ-2 Construction Emissions Measures

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

> *Project applicants shall comply with the current Bay Area Air Quality Management District's basic control measures for reducing construction emissions of PM_{10} (Table 8-2, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the May 2017 BAAQMD CEQA Guidelines), outlined below.*
>
> 1. *All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times a day.*
> 2. *All haul trucks transporting soil, sand, or other loose material off-site shall be covered.*
> 3. *All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.*
> 4. *All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.*
> 5. *All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.*
> 6. *Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.*
> 7. *All construction equipment shall be maintained and properly tuned in accordance with manufacture's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper conditions prior to operation.*

8. *Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD's number shall also be visible to ensure compliance with applicable regulations.*

Significance After Mitigation

Implementation of mitigation measures AQ-1 and AQ-2 would require individual air quality analysis and incorporation of BAAQMD Basic Construction Measures which reduce temporary construction impacts and fugitive dust emissions to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Carbon Monoxide Hotspots

A CO hotspot is a localized concentration of CO that is above a CO ambient air quality standard. The entire Basin is in conformance with state and federal CO standards (BAAQMD 2017c). There are no current exceedances of CO standards within the BAAQMD jurisdiction and have not had a CO exceedance in the Bay Area since before 1994.[6] For 2019 the Bay Area's reported maximum 1-hour and average daily concentrations of CO were 5.6 ppm and 1.7 ppm respectively (BAAQMD 2019).[7] These are well below the respective 1-hour and 8-hour standards of 20 ppm and 9 ppm. Given the ambient concentrations, which include mobile as well as stationary sources, a project in the Bay Area would need to emit concentrations three times the hourly maximum ambient emissions for all sources before project emissions would exceed the 1-hour standard. Additionally, the project would need to emit seven times the daily average for ambient concentrations to exceed the 8-hour standards. Typical development projects, even plan level growth, would not emit the levels of CO necessary to result in a localized hot spot. Therefore, impacts to CO hotspots would be less than significant.

Toxic Air Contaminants

Construction

Construction-related activities would result in short-term emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation (e.g., excavation, grading, and clearing), building construction, and other miscellaneous activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM, as discussed below, outweighs the potential non-cancer[8] health impacts (CARB 2021).

Generation of DPM from construction typically occurs in a single area for a short period. Construction of development facilitated by the project would occur over approximately a decade, but use of diesel-powered construction equipment in any one area would likely occur for no more than a few years for an individual project and would cease when construction is completed in that area. It is impossible to quantify risk without identified specific project details, timelines, and locations.

[6] BAAQMD only has records for annual air quality summaries dating back to 1994.
[7] Data for 2019 was used as the data for 2020 and 2021 are not currently available.
[8] Non-cancer risks include premature death, hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function (CARB 2021a).

Each project developed under the proposed HEU would be required to comply with applicable BAAQMD regulatory requirements and control strategies and the CARB In-Use Off-Road Diesel Vehicle Regulation, which are intended to reduce emissions from construction equipment and activities. Additionally, future development facilitated by the proposed HEU would be required to comply with Mitigation Measure AQ-2 requiring implementation of construction emission measures that would reduce construction-related TACs. According to the OEHHA, construction of individual projects lasting longer than two months or placed within 1,000 feet of sensitive receptors could potentially expose nearby sensitive receptors to substantial pollutant concentrations and therefore could result in potentially significant risk impacts (OEHHA 2015). These projects could exceed BAAQMD's thresholds of an increased cancer risk of greater than 10.0 in a million and an increased non-cancer risk of greater than 1.0 Hazard Index (Chronic or Acute). Therefore, construction impacts from TAC emissions would be potentially significant and Mitigation Measure AQ-3 would be required.

Operation

In the Bay Area, there are several urban or industrialized communities where the exposure to TACs is relatively high in comparison to others. The City of Los Altos is not located in an impacted community according to BAAQMD *CEQA Guidelines*. Sources of TACs include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities (BAAQMD 2017a). Operation of development facilitated by the project would not involve these uses, and therefore, would not be considered a source of TACs. In addition, residences do not typically include new stationary sources onsite, such as emergency diesel generators. However, if a residential project did include a new stationary source onsite, it would be subject to BAAQMD Regulation 2, Rule 2 (New Source Review) and require permitting. This process would ensure that the stationary source does not exceed applicable BAAQMD health risk thresholds. Development facilitated by the project would be required to comply with the residential indoor air quality requirements in the Title 24 Building Energy Efficiency Standards, which currently require Minimum Efficiency Reporting Value 13 (or equivalent) filters for heating/cooling systems and ventilation systems in residences (Section 150.0[m])). Therefore, this impact would be less than significant.

Mitigation Measures

The following mitigation measure is required.

AQ-3 Construction Health Risk Assessment

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

> *For individual projects where construction activities would last longer than two months and where construction would occur within 1,000 feet of sensitive receptors, Tier 4 equipment and/or alternative fuel construction equipment shall be used.*

Significance After Mitigation

Implementation of Mitigation Measure AQ-3 would require use of Tier 4 or alternative fuel construction equipment for projects with construction timelines greater than two months and within 1,000 feet of sensitive receptors, in order to reduce potential risk associated with diesel fuel emissions exposure to nearby sensitive receptors to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust both during normal use and when idling. However, these odors would be temporary and transitory and would cease upon completion. Therefore, development facilitated by the project would not generate objectionable odors affecting a substantial number of people.

BAAQMD includes odor screening distances for land uses with the potential to generate substantial odor complaints. Those uses include wastewater treatment plants, landfills or transfer stations, refineries, composting facilities, confined animal facilities, food manufacturing, smelting plants, and chemical plants. The proposed HEU would facilitate residential development which does not have the potential to generate substantial odor emissions. Therefore, development facilitated by the project would not generate objectionable odors affecting a substantial number of people during operation. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	■	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	■	☐	☐
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?	☐	■	☐	☐
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?	☐	■	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	■	☐
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?	☐	☐	☐	■

Environmental Setting

Vegetation and Wildlife

The City of Los Altos is urbanized and significant vegetation communities and biological resources have not been identified and are not likely to exist. However, there are riparian corridors and stands of mature trees along creek corridors and within the Redwood Grove Nature Preserve, which provide habitat for animal species. Mature trees are also scattered throughout the city's low-density residential neighborhoods, parks, and school sites.

According to a search on the California Department of Fish and Wildlife's (FWS) Information for Planning and Consultation (IPaC) database, the following endangered species could potentially be present within City limits: Salt marsh harvest mouse (*Reithrodontomys raviventris*), California clapper rail (*Rallus longirostris obsoletus*), California least tern (*Sterna antillarum browni*), San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), Vernal pool tadpole shrimp (*Lepidurus packardi*), Fountain thistle (*Cirsium fontinales var. fontinales*), San Mateo thronmint (*Acanthomintha obovate ssp. Duttonii*), and Showy Indian clover (*Trifolium amoenum*) (FWS 2022).

Creek Channels

Four creeks are located within the city: Adobe Creek, Hale Creek, Permanente Creek, and Stevens Creek. The creeks provide open space for preservation of biological resources and riparian habitat. The City's creeks and flood zones are shown in Figure 5.

Impact Analysis

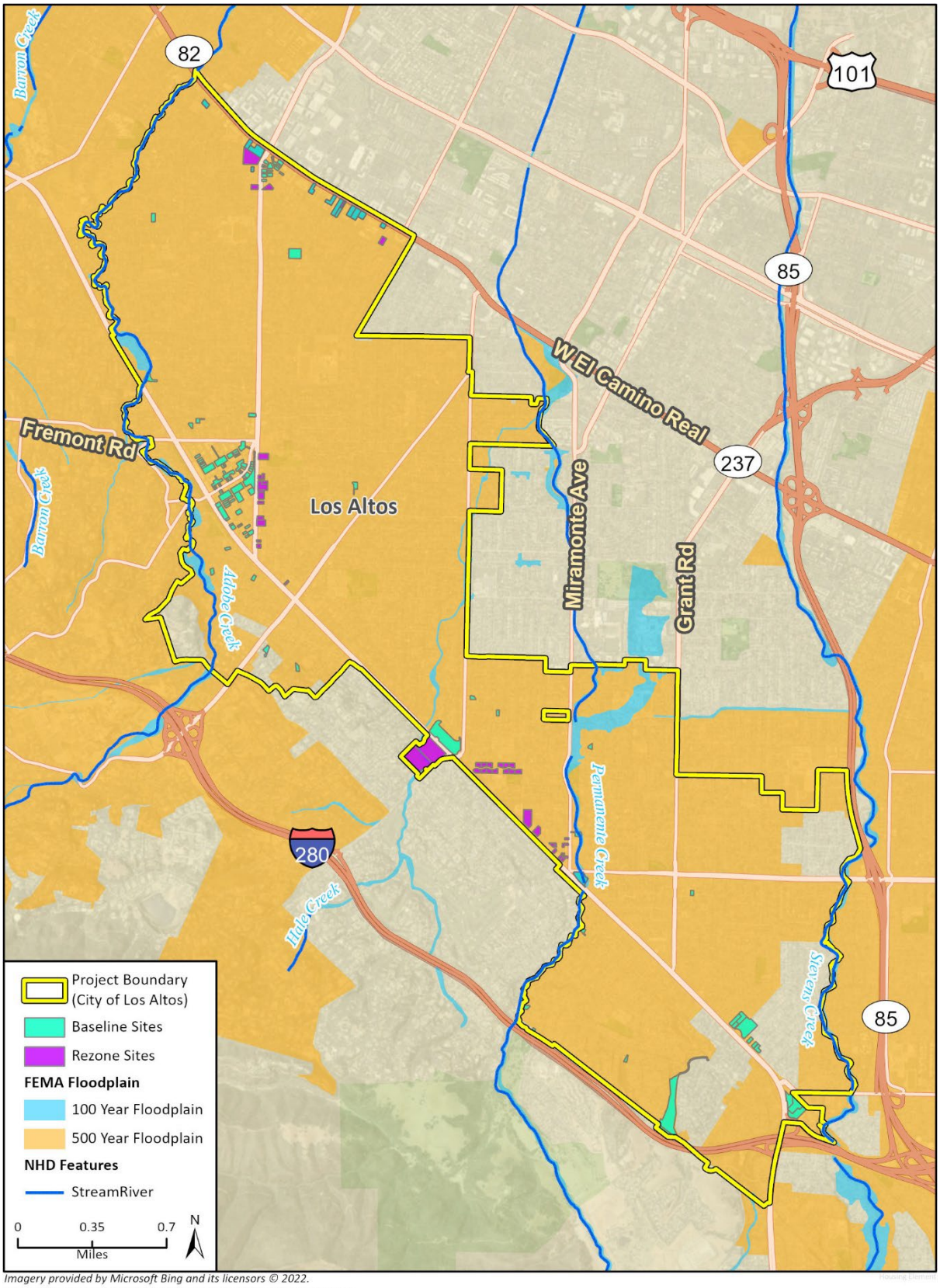
a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Special-status species are those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the United States Fish and Wildlife Service (USFWS) under the Federal Endangered Species Act. According to the USFWS Critical Habitat for Threatened & Endangered Species Map, there is no critical habitat within the city (USFWS 2022).

Future development projects would be subject to federal and State laws, regulations, and management policies regarding biological resources, such as the federal and State Endangered Species Act and permitting pursuant to California Fish and Game Commission (CFGC) Section 1600 et seq.

Although special-status species would be protected by the California Fish and Game Code or the Migratory Bird Treaty Act regulations, special-status bat species could potentially be present in Los Altos and may be affected by proposed projects where they occur in buildings or similar structures or in native habitat adjacent to construction areas. Therefore, impacts to these species are potentially significant and Mitigation Measure BIO-1 would be required.

Figure 5 Los Altos Creeks and Flood Zones



Imagery provided by Microsoft Bing and its licensors © 2022.
Additional data provided by National Hydrology Dataset, FEMA, 2022.

Mitigation Measures

The following mitigation measure is required:

BIO-1 Special-status Bat Species Avoidance and Minimization

The City shall establish the following Standard Condition of Approval for projects requiring approval:

> *For projects that involve demolition of uninhabited buildings or removal of mature trees large enough to contain crevices and hollows that could support bat roosting, focused surveys to determine the presence/absence of roosting bats shall be conducted prior to demolition or tree removal. If active maternity roosts are identified, a qualified biologist shall establish avoidance buffers applicable to the species, the roost location and exposure, and the proposed construction activity in the area. If active non-maternity day or night roosts are found on the project site, measures shall be implemented to passively relocate bats from the roosts prior to the onset of construction activities. Such measures may include removal of roosting site during the time of day the roost is unoccupied or the installation of one-way doors, allowing the bats to leave the roost but not to re-enter. These measures shall be presented in a Bat Passive Relocation Plan that shall be submitted to, and approved by, CDFW.*

Significance After Mitigation

Implementation of Mitigation Measure BIO-2 would reduce impacts to roosting bats to a less than significant level.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The four creeks in Los Altos (Adobe Creek, Hale Creek, Permanent Creek, and Stevens Creek) may provide corridors for wildlife movement and may provide refugia and habitat for wildlife. Common and special-status wildlife and plant species that have acclimated to urban areas could be present on the housing sites at the time of development, particularly on parcels that are located in proximity to the creeks. The four creeks present within Los Altos could provide a wildlife corridor for fish and other aquatic species, and construction activities from future development could potentially result in impacts to the movement of native fish.

Since the proposed HEU would mostly facilitate infill development in already developed areas and increase of density and height on sites to accommodate the City's RHNA numbers, there is a low likelihood that habitat for listed species to occur on the sites. However, as shown in Figure 5, two housing sites would be located adjacent to Permanente Creek, two would be located adjacent to Hale Creek, and several housing sites would be located in proximity to the four creeks, which could result in impacts to sensitive biological resources during construction-related activities such as vegetation removal and result in degradation to plant and wildlife habitat.

Future development would be required to comply with LAMC Chapter 6.32, which outlines watercourse protection regulations and prohibits modification and pollution of the creeks. Section 6.32.030 prohibits residents of properties through which a watercourse passes from polluting the specific part of the watercourse, and prohibits residents from removing healthy vegetation on or adjacent to the watercourse bank; and Section 6.32.040 outlines setback requirements along Adobe Creek. Additionally, LAMC Chapter 10.16 details requirements for stormwater pollution prevention measures which would reduce stormwater runoff from polluting the creeks. This would reduce the

potential for modifications to the waterways that would prohibit wildlife movement or affect riparian habitat or sensitive species.

Future development proposals would also be subject to the Los Altos General Plan and its policies regarding the protection of biological resources. Specifically, Policies 2.3 and 2.7 of the Open Space Element aim to protect creeks, creek-side areas, and riparian habitats in their natural state and establish buffers from adjoining land uses to protect creek-side areas. Additionally, housing sites near creeks and streams would be subject to the Santa Clara Valley Water Resources Protection Collaborative's (Water Collaborative) Guidelines and Standards for Land Use Near Streams manual during the City's development review process (Water Collaborative 2007), which are designed to protect creeks and riparian habitats.

Nonetheless, because implementation of the proposed HEU could encourage development and rezone sites that contain waterways and may contain sensitive species or habitat, this impact is potentially significant and Mitigation Measure BIO-3 would be required.

Mitigation Measures

The following mitigation measure is required:

BIO-2 Biological Resources Screening and Assessment

The City shall establish the following Standard Condition of Approval for projects requiring approval:

> *For projects on sites located on or adjacent to a creek, the project applicant shall hire a qualified biologist to perform a preliminary biological resources screening, for the City's review and approval, to determine whether the project has the potential to impact special status biological resources, inclusive of special status plants and animals, sensitive vegetation communities, jurisdictional waters (including creeks, drainages, streams, ponds, vernal pools, riparian areas and other wetlands), critical habitat, wildlife movement area, or biological resources protected under local or regional ordinances or an existing HCP or NCCP. If it is determined that the project has no potential to impact biological resources, no further action is required.*
>
> *If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 50 feet around the project footprint, as is feasible, and to determine the potential impacts to those resources, as approved by the City. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, State, and/or federal agencies. If the project would have the potential to impact these resources, recommendations developed to enhance wildlife movement (e.g., installation of wildlife friendly fencing), as applicable, to reduce impacts to less than significant levels. Pending the results of the project-specific biological analysis, City review, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, NMFS, CDFW, and/or other local, State, and federal agencies may be required.*

Significance After Mitigation

Implementation of Mitigation Measure BIO-2 would reduce impacts to special status species by requiring biological resources studies for projects located on or adjacent to creeks and implementation of further requirements to avoid or reduce impacts on a project-by-project basis.

c. Would the project 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?

Adobe Creek, Hale Creek, Permanente Creek, and Stevens Creek are the four creeks present within the City. Hale Creek and Permanente Creek traverse the middle of the City, while Adobe Creek runs along the northwestern border of the City and Stevens Creek runs along the southeastern border of the City, as shown in Figure 5. The four creeks eventually flows into San Francisco Bay, a Traditional Navigable Water, and therefore are potentially under the jurisdiction of the U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and/or Regional Water Quality Control Board (RWQCB). Although the 2023-2031 would facilitate development on or adjacent to the four creeks, especially Hale Creek and Permanente Creek, future development would be required to comply with Water Collaborative's Guidelines and Standards for Land Use Near Streams manual during the City's development review process (Water Collaborative 2007), which involve the protection of creeks and water quality. Future development would also be required to adhere to LAMC Chapter 6.32, which outlines watercourse protection regulations. Specifically, Section 6.32.030 prohibits residents of properties through which a watercourse passes from polluting the specific part of the watercourse and prohibits residents from removing healthy vegetation on or adjacent to the watercourse bank; and LAMC Section 6.32.040 outlines setback requirements along Adobe Creek. Additionally, LAMC Chapter 10.16 details requirements for stormwater pollution prevention measures which would reduce stormwater runoff from polluting the creeks. Therefore, adherence to federal, State, and local regulations, would reduce impacts to wetlands and creeks. Nonetheless, as implementation of the proposed project would involve development on sites adjacent to creeks and the exact design of such development is unknown at this time, impacts to waters and wetlands would be potentially significant and mitigation measures BIO-3 and BIO-4 would be required.

Mitigation Measures

The following mitigation measures are required:

BIO-3 Jurisdictional Delineation

The City shall establish the following Standard Condition of Approval for projects requiring approval:

> *If potentially jurisdictional waters and/or wetlands are identified by the project-specific analysis (as required by Mitigation Measure BIO-3), for projects on sites that are on or adjacent (within 200 feet) to a creek, a qualified biologist shall complete a jurisdictional delineation to determine the extent of the jurisdictions for CDFW, USACE, and/or RWQCB. This delineation shall be conducted in accordance with the requirements set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the City, USACE, RWQCB, and CDFW, as appropriate, for review and approval. Jurisdictional areas shall be avoided. If jurisdictional areas are expected to be impacted, then the RWQCB would require a Waste Discharge Requirements (WDRs) permit and/or Section 401 Water Quality Certification (depending upon whether the feature falls under federal jurisdiction). If CDFW asserts its jurisdictional authority, then a Streambed Alteration Agreement pursuant to Section 1600 et seq. of the CFGC would also be required prior to construction within the areas of CDFW jurisdiction. If the USACE asserts its authority, then a permit pursuant to CWA Section 404 would likely be required. Furthermore, a compensatory mitigation program shall be implemented in accordance with Mitigation Measure BIO-4 and the measures set forth by the aforementioned regulatory*

agencies during the permitting process. Compensatory mitigations for all permanent impacts to waters of the U.S. and waters of the state shall be completed at a ratio as required in applicable permits but shall not be less than a minimum ratio of 1:1. All temporary impacts to waters of the U.S. and waters of the State shall be fully restored to natural condition. The project applicant shall submit the report documenting restoration activities and monitoring to the City for review and approval.

BIO-4 General Avoidance and Minimization

The City shall establish the following Standard Condition of Approval for projects requiring approval:

Potential jurisdictional features on sites identified in jurisdictional delineation reports shall be avoided. Projects that may impact jurisdictional features shall include a report detailing how all identified jurisdictional features will be avoided, including groundwater draw down. The project applicant shall submit this report to the City for review and approval prior to construction.

- *Material/spoils generated from project activities shall be located away from jurisdictional areas or special-status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls (non- monofilament), covers, sand/gravel bags, and straw bale barriers, as appropriate.*
- *Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank.*
- *Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative will be notified.*

Significance After Mitigation

Implementation of mitigation measures BIO-3 and BIO-4 would reduce impacts to State and federally protected waters and wetlands by requiring jurisdictional delineations for projects within the housing inventory sites on or adjacent to creeks, and implementation of further requirements to avoid or reduce impacts on a project-by-project basis. Impacts to waters and wetlands would be mitigated to less than significant levels.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. Would the project 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 City of Los Altos is largely built-out and does not function as a significant regional or local wildlife movement corridor. Wildlife corridors often overlap land designated as open space, but as there are limited wildland open spaces with connectivity to larger undeveloped open spaces within urban Los Altos, natural wildlife corridors are not present in most parts of the city. As discussed in checklist question (b) above, the city's four creeks could provide a wildlife corridor for fish and other aquatic species, and construction activities from future development could potentially result in impacts to the movement of native fish. However, adherence to State and local regulations discussed above and implementation of Mitigation Measure BIO-2 would reduce impacts to a less than significant level.

Los Altos contains mature groves of trees that could provide suitable nesting substrates for birds protected under the MBTA and CFGC. In addition, mature tree groves exist along creek corridors, which could be used for nursery sites by native bird species. Future development would be required to comply with tree protection regulations pursuant to LAMC Section 11.08.120, which would preserve existing trees. Furthermore, sensitive species such as nesting birds and roosting bats would be protected by the California Fish and Game Code or the Migratory Bird Treaty Act regulations. Nonetheless, if construction of specific development projects implemented under the proposed project occurs during the breeding season, impacts to nesting

birds may occur. Impacts may include direct impacts to active nests, including eggs or young, if nesting substrates are removed as part of the project. Indirect impacts may result if noise, vibration, and human presence cause adult birds to abandon the nests for prolonged periods of time, preventing them from incubating eggs, brooding chicks, and defending the nest from predators. Therefore, this impact is potentially significant and Mitigation Measure BIO-5 would be required.

Mitigation Measures

The following mitigation measure is required:

BIO-5 Preconstruction Surveys for Nesting Birds

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

> *For projects that would involve native or naturalized vegetation or tree removal, a general pre-construction nesting bird survey shall be conducted by a qualified biologist within 14 days prior to the initiation of construction activities. If construction is stopped for more than 14 days during the nesting season, a pre-construction survey shall be conducted prior to the re-start of construction activities. Surveys shall include the disturbance area plus a 50-foot buffer for passerine species, and a 500-foot buffer for raptors.*
>
> *If active nests are located, an appropriate avoidance buffer shall be established within which no work activity would be allowed that would impact these nests. The avoidance buffer shall be established by the qualified biologist on a case-by-case basis based on the species and site conditions. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until juveniles have fledged and/or the nest is inactive. A qualified biologist shall confirm that breeding/nesting is complete, and the nest is no longer active prior to removal of the buffer. If work within a buffer area cannot be avoided, then a qualified biologist shall be present to monitor all project activities that occur within the buffer. The biological monitor shall evaluate the nesting avian species for signs of disturbance and shall have the ability to stop work.*

Significance After Mitigation

Implementation of Mitigation Measure BIO-5 would reduce impacts to nesting birds to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Future development in Los Altos may involve the removal of mature trees during construction. As outlined in the City's Tree Protection Ordinance (LAMC Chapter 11.08), all trees, regardless of species, that are 48-inches or larger in circumference are protected would require a Tree Removal Permit before they can be removed. Additionally, future development would be required to comply with Section 11.08.120 of the LAMC which outlines tree protection measures during construction such as installing protective fencing and repairing damaged trees. Therefore, with required adherence to the City's Tree Protection Ordinance, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

There are no habitat conservation plans or natural community conservation plans adopted in Los Altos. The city is also located outside of the Santa Clara Valley Habitat Conservation Plan. There would be no impact.

NO IMPACT

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5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	■	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	■	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	■	☐

Regulatory Setting

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires a lead agency determine whether a project may have a significant effect on historical resources (Public Resources Code (PRC), Section 21084.1). A historical resource is a resource listed in, or determined by the California Historical Resources Commission to be eligible for listing, in the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources, or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines on the basis of substantial evidence to be historically significant (State CEQA Guidelines, Section 15064.5(a)(1-3)). Historical resources may include eligible built environment resources and archaeological resources from any time period.

If a resource has sufficient integrity to convey information about the past, it may be considered historically significant based on substantial evidence that it:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

CEQA Guidelines Section 15064.5(c) provides further guidance on the consideration of archaeological resources. If an archaeological resource does not qualify as a historical resource, it may meet the definition of a "unique archaeological resource" as identified in PRC Section 21083.2. If it can be demonstrated that a project would cause damage to a unique archaeological resource,

the lead agency may require reasonable efforts be made to permit any or all these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC, Section 21083.2[a], [b]).

PRC, Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

CEQA Guidelines Section 15064.5 also provides guidance for addressing the potential presence of human remains, including those discovered during the implementation of a project.

City of Los Altos Municipal Code

The City of Los Altos' Municipal Code Chapter 12.44 *Historic Preservation* defines the criteria for historic resource and historic landmark designation and procedures for the treatment of historic resources. Section 12.44.040 establishes the criteria for designation. A structure, property or object may be eligible for designation as a historic resource or historic landmark, if it/they satisfy each of the three criteria listed below:

A. **Age.** A structure or property should be more than fifty (50) years in age. (Exceptions can be made to this rule if the building(s) or site(s) is/are truly remarkable for some reason - such as being associated with an outstanding architect, personage, usage or event).
B. **Determination of Integrity.** A structure or property should retain sufficient historic integrity in most of the following areas:
    1. Design: The combination of elements that create the form, plan, space, structure and style of a property.
    2. Setting: The physical environment of a historic property.
    3. Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
    4. Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
    5. Feeling: A property's expression of the aesthetic or historic sense of a particular period of time.
C. **Historic Significance.** A structure or property should be clearly associated with one or more of the following areas of significance:
        1. Event: Associated with a single significant event or a pattern of events that have made a significant contribution to broad patterns of local or regional history, or cultural heritage of California or the United States;
        2. Person/People: Associated with the lives of persons important to the local, California or national history;

3. Architecture/Design: Embodies the distinctive characteristics of a design-type, period, region or method of construction, or represents the work of a master or possesses high artistic value; or
4. Archaeology: Yields important information about prehistory or history of the local area, California or the nation.

City of Los Altos Housing Development Permit Application Requirements

While not part of the City's adopted Municipal Code, Los Altos' Housing Development Project Application process includes a requirement for historic resources evaluations for certain projects involving properties over 50 years of age. Permit applications are required to include a set of State of California Department of Parks and Recreation (DPR) Series Forms 523A and 523B, documenting a historic resource evaluation in the following project scenarios:

Environmental Setting

The environmental setting research completed for this analysis included a review of the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), the California Office of Historic Preservation (OHP) Built Environment Resource Directory (BERD) for all previously evaluated historic properties within the City of Los Altos, including the 1,048 baseline housing opportunity sites and the 600 rezone sites located throughout the City, and comprising of a total of 175 parcels. It also included a review of the City's Historic Resources Inventory (HRI), which identifies designated Historic Landmarks in addition to Historic Resources and designated Historic Districts that are significant at the local level. All properties on the HRI are subject to the City's Historic Preservation Ordinance. Properties on the HRI are potentially eligible for designation as Historic Landmarks (City of Los Altos Historic Resources Inventory, 2012). The research identified a number of properties that are listed in or eligible for listing in the NRHP, CRHR, or the City's HRI ; of these, two historical resources are located on housing opportunity sites, as described below.

- 625 Palm Avenue (APN 17516088) consists of a landscaped area presumed to be associated with the Lanthier House, with which it shares an address. Lanthier House is listed on the City's Historic Inventory and is identified in the BERD with an OHP status of 5S2, meaning it is individually eligible for local listing or designation.
- 398 Main Street (APN 16739091) contains the Altos Land Company Building which is designated locally as a landmark and identified in the BERD with a status code of 5S2.

A review of parcel data and historical aerial photographs of the properties comprising the housing opportunity sites identified 116 parcels with properties that have not been subject to previous historical resources evaluation and currently meet the 45-year threshold which, pursuant to guidance from OHP, generally triggers the need for evaluation as part of review of a proposed project on those sites, recognizing there is commonly a lag between resource identification and when planning decisions are made. Of these, 13 properties were previously analyzed as part of the environmental review for the 5th Cycle Housing Element (2015-2023). An additional 12 properties would become 45 years of age during the 2023-2031 planning period of the 2023-2031 Housing Element. Two of these were previously included in the 5th Cycle Housing Element. Pending further analysis there is a potential for these properties to qualify as historical resources pursuant to CEQA. All previously unevaluated properties that are currently aged 45 years and those that will become age-eligible during the 2023-2031 planning period of the Housing Element are listed in Appendix B.

Checklist question (a) broadly refers to historical resources. To more clearly differentiate between archaeological and built environment resources, analysis under checklist question (a) is limited to built environment resources. Archaeological resources, including those that may be considered historical resources pursuant to Section 15064.5 and those that may be considered unique archaeological resources pursuant to Section 21083.2, are considered under checklist question (b).

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

The proposed HEU does not propose any specific development. However, it envisions development including the proposed rezoning of sites for the potential development of additional housing units to meet the City's RHNA needs on parcels that contain buildings that meet the age threshold for potential historical resources pursuant to CEQA. Development on these parcels could be proposed by a property owner or project applicant with or without the City's adoption of the HEU; still, development associated with the proposed HEU could result in the material impairment of historical resources, which *CEQA Guidelines* Section 15064.5(b)(2)(A) defines as the demolition or alteration in an adverse manner of those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR or a local register. The City of Los Altos' Historic Preservation Ordinance provides procedures for designating a property as part of the local Historic Inventory and provisions to review and regulate proposed changes, including demolition, new construction, or alteration to designated properties (Chapter 12.44). Additionally, the City has submittal requirements in place for housing development project applications for any building listed or determined eligible for listing at the national, state, or local level or that contains any building, structure, or permanently located object that has been in existence for at least 45 years. The City's regulations would mitigate impacts to historical resources listed in the NRHP, CRHR, as a City Landmark or on the City's HRI. Additionally, buildings 45 years or older, are subject to planning review requiring a historical resource evaluation to be prepared by a professional architect or someone with at least one year of graduate study in architectural preservation, American architectural history, preservation planning, or closely related field or at least one year of full-time professional experience on historic preservation projects. This is to identify any property that may qualify as a historic resource that has not previously been identified as such, to ensure that any redevelopment of such a property either: (1) will not impair those elements or aspects of the property that convey historic significance, or (2) is done in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer.

With compliance with the City's regulations and application requirements and State and federal regulations, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Although the City of Los Altos does not maintain an inventory of archaeological sites, it is understood that archaeological sites are present in the City of Los Altos and the surrounding areas.

Therefore, there is potential to encounter archaeological resources in the City of Los Altos and on residential opportunity sites specified in the 2023-2031 Housing Element. Undeveloped properties in the housing inventory sites have a higher probability of containing previously unidentified archaeological resources given the probable lack of previous ground-disturbing activities on those properties. However, ground-disturbance into native soils on housing inventory sites could encounter prehistoric or historic-period archaeological resources.

Because the proposed HEU is a policy document and does not include specific development proposals, it cannot be ascertained with certainty where ground-disturbing activities could occur in these areas. Specific impacts to archaeological resources are therefore unknown at this time and would be determined by project-level analysis. Effects on archaeological resources can only be known once a specific project has been proposed, because potential effects are highly dependent on the individual project site conditions and the characteristics of proposed ground-disturbing activity. However, the proposed HEU would prioritize the development of new housing near areas that have previously been developed and disturbed and away from undeveloped land and/or environmentally sensitive resources. Therefore, it is likely that on future development sites under the proposed project, prior grading, construction, and modern use of the sites would have either removed or impacted archaeological resources within surficial soils.

Nonetheless, there is the potential for archaeological resources to exist below the ground surface throughout the City of Los Altos, which could be disturbed by grading and excavation activities associated with new housing development. As such, individual development projects under the proposed project that would involve ground disturbing activities would have the potential to damage or destroy archaeological resources, especially if they occur below the existing road base or in less disturbed or native soils.

Consequently, damage to, or destruction of previously unknown sub-surface archaeological resources could occur as a result of development implemented under the proposed HEU. This represents a potentially significant impact and mitigation measures CUL-1 and CUL-2 are required.

Mitigation Measures

The following mitigation measures are required:

CUL-1 Archaeological Resources Assessment

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

> *Prior to approval of any individual development projects under the 2023-2031 Housing Element that will involve ground disturbance activities that may include, but are not limited to, grading and excavation, an archaeological resources assessment shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards in either prehistoric or historic archaeology. Assessments shall include a California Historical Resources Information System (CHRIS) records search at the Northwest Information Center (NWIC) and a Sacred Lands File Search maintained by the Native American Heritage Commission (NAHC). The records searches shall characterize the results of previous cultural resource surveys and disclose any cultural resources that have been recorded and/or evaluated in and around the project site. A Phase I pedestrian survey shall be undertaken in proposed project sites that are undeveloped to identify the presence or absence of any surface cultural materials. By performing a records search, a Sacred Lands File search, and a Phase I*

survey, a qualified archaeologist will classify the project site as having high, medium, or low sensitivity for archaeological resources.

If the Phase I archaeological survey identifies resources that may be affected by the project, the archaeological resources assessment shall also include Phase II testing and evaluation. If resources are determined significant or unique through Phase II testing and site avoidance is not possible, appropriate site-specific mitigation measures shall be identified in the Phase II evaluation. These measures may include, but would not be limited to, a Phase III Data Recovery Program, avoidance, or other appropriate actions to be determined by a qualified archaeologist. If significant archaeological resources cannot be avoided, impacts may be reduced to less than significant by adding fill soils on top of the resources rather than cutting into the cultural deposits. Alternatively, and/or in addition, a data collection program may be warranted, including mapping the location of artifacts, surface collection of artifacts, or excavation of the cultural deposit to characterize the nature of the buried portions of sites. Curation of the excavated artifacts or samples would occur as specified by the archaeologist in consultation with the City of Los Altos and with other relevant parties.

CUL-2 Unanticipated Discoveries of Archaeological Resources

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities associated with the 2023-2031 Housing Element, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of California Code of Regulations (CCR) Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City of Los Altos shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Guidelines Section 15126.4(b)(3)(C).

Significance After Mitigation

Mitigation measures CUL-1 and CUL-2 would reduce potential impacts to a less than significant level by requiring the identification and evaluation of any archaeological resources that may be present prior to project construction and by providing steps for the evaluation and protection of unanticipated finds encountered during construction.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Human burials outside of formal cemeteries often occur in prehistoric archaeological contexts. Although much of Los Altos is developed and the City of Los Altos does not have records of burial sites within Los Altos, the potential still exists for these resources to be present. Excavation during construction activities in Los Altos related to the proposed HEU would have the potential to disturb these resources, including Native American burials.

Human burials, in addition to being potential archaeological resources, have specific provisions for treatment in PRC Section 5097. The California Health and Safety Code (Section 7050.5, 7051, and 7054) has specific provisions for the protection of human burial remains. Existing regulations address the illegality of interfering with human burial remains, and protect them from disturbance, vandalism, or destruction. They also include established procedures to be implemented if Native American skeletal remains are discovered. PRC Section 5097.98 also addresses the disposition of Native American burials, protects such remains, and established the NAHC to resolve any related disputes.

Development projects are subject to State of California Health and Safety Code Section 7050.5 which states that, if human remains are unearthed, no further disturbance can occur until the county coroner has made the necessary findings as to the origin and disposition of the remains pursuant to the PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site and make recommendations to the landowner within 48 hours of being granted access. If the landowner rejects the MLD's recommendations, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance and shall take additional steps outlined in the statute for protecting the site where the human remains and associated items are reinterred. With adherence to these existing regulations impacts to human remains would be less than significant. No mitigation is required.

LESS THAN SIGNIFICANT IMPACT

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6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	■	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	■	☐

Environmental Setting

California is one of the lowest per-capita energy users in the United States, ranked 48th in the nation, due to its energy efficiency programs and mild climate. Most of the electricity generated in California is from natural gas-fired power plants, which provided approximately 48 percent of total electricity generated in 2020. According to the California Energy Commission (CEC), in 2020 California used 272,575 gigawatt hours (GWh) of electricity and produced 70 percent (190,913 GWh) of the electricity it used and imported the rest from outside the state (CEC 2020). In 2018, SB 100 accelerated the state's Renewable Portfolio Standards Program, codified in the Public Utilities Act, by requiring electricity providers to increase procurement from eligible renewable energy and zero-carbon resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Energy consumed by the transportation sector accounts for roughly 39.5 percent of California's energy demand, amounting to approximately 3,073.3 trillion Btu in 2019. Petroleum-based fuels are used for approximately 98.4 percent of the state's transportation activity. Most gasoline and diesel fuel sold in California for motor vehicles is refined in California to meet state-specific formulations required by the California Air Resources Board (CARB). California's transportation sector, including on-road and rail transportation, consumed approximately 662 million barrels of petroleum fuels in 2019 (EIA 2021).

According to the CEC, Santa Clara County consumed approximately 16,436 giga-watts per hour (GWh) of electricity and 419 million of therms of natural gas in 2020 (CEC 2022a; CEC 2022b). The City of Los Altos residential sector consumed approximately 80,391,486 kilo-watts per hour (kWh) of electricity and 6,640,225 therms of natural gas in 2018 (City of Los Altos 2022a).

Electricity and natural gas service in Los Altos is supplied by SVCE and PG&E, with SVCE being the main provider. As the City's main electricity provider, SVCE enrolls new customers in their GreenStart program, which sources 50 percent of electricity from renewable energy sources and 50 percent from carbon-free sources. Customers have the option to upgrade to SVCE's GreenPrime program which sources 100 percent of electricity from renewable energy sources (SVCE 2022).

The City is currently updating its Reach Code, which, if adopted, would require all-electric construction for all building types along with additional EV-charging infrastructure. The Reach Code would also prohibit extension of gas service lines to new outdoor appliances and equipment such as pool and spa equipment or barbecues.

Impact Analysis

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Energy consumption is directly related to environmental quality in that the consumption of nonrenewable energy resources releases criteria air pollutant and GHG emissions into the atmosphere. The environmental impacts of air pollutant and GHG emissions associated with the project's energy consumption are discussed in detail in Section 3, *Air Quality*, and Section 8, *Greenhouse Gas Emissions*, respectively.

Los Altos demonstrates its commitment to energy efficiency and renewable energy via implementation of CALGreen and State-mandated Energy Efficiency Requirements for new development and retrofits. The proposed HEU would facilitate development of projects to encourage housing on vacant or underutilized sites, as well as rezoning to allow for higher residential densities. When proposed, individual projects would be required, pursuant to the requirements of CALGreen, to comply with the zero-net energy requirements, where new development combines energy efficiency and renewable energy generation to consume only as much energy as can be produced on-site through renewable resources over a specified period. However, development under the proposed HEU would consume energy during construction and operation, using petroleum fuel, natural gas, and electricity, as discussed below.

Energy use during construction associated with future development under the proposed HEU would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. Temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during the construction of individual projects would be temporary in nature, and equipment used would be typical of construction projects in the region. Construction contractors would be required to demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities associated with reasonably foreseeable development under the proposed HEU would be required to utilize fuel-efficient equipment consistent with federal and State regulations and would comply with State measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, individual projects would be required to comply with construction waste management practices to divert at least 65 percent of construction and demolition debris pursuant to LAMC Chapter 6.14. These practices would result in efficient use of energy during construction of future development under the proposed HEU. Furthermore, in the interest of both environmental awareness and cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, future construction activities associated with development under the proposed HEU would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

Long-term operation of future development under the proposed HEU would require permanent grid connections for electricity and natural gas service to power internal and exterior building lighting, and heating and cooling systems. Electricity and natural gas service in Los Altos is supplied by SVCE and PG&E, with SVCE being the main provider. Development facilitated by the proposed HEU would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (CALGreen, Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. This code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances and provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. Furthermore, the 2019 Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the CEC such as installing PV systems on all low-rise residential structures up to three stories equal to the expected electricity usage. CALGreen sets targets for energy efficiency, water consumption, dual plumbing systems for potable and recyclable water, diversion of construction waste from landfills, and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. These standards for new buildings are designed for energy efficient performance, using clean electricity, so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. Additionally, pursuant to the City's Reach Code, future new development would be required to be all-electric and would not include natural gas.

The housing inventory sites are located in the Downtown as well as near or adjacent to transportation corridors, which would reduce trip distances and encourage the use of alternative modes of transportation such as bicycling and walking. These factors would minimize the potential of the proposed project to result in the wasteful or unnecessary consumption of vehicle fuels. As a result, operation of development projects under the proposed HEU would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Several State plans as well as the City's adopted General Plan include energy conservation and energy efficiency strategies intended to enable the State and the City to achieve GHG reduction and energy conservation goals. A full discussion of the proposed project's consistency with GHG reduction plans is included in Section 8, *Greenhouse Gas Emissions*. As shown in Table 10, the project would be consistent with applicable State renewable energy and energy efficiency plans.

Table 10 Consistency with State Renewable Energy and Energy Efficiency Plans

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
Assembly Bill 2076: Reducing Dependence on Petroleum. Pursuant to AB 2076, the CEC and CARB prepared and adopted a joint-agency report, Reducing California's Petroleum Dependence, in 2003. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT. One of the performance-based goals of AB 2076 is to reduce petroleum demand to 15 percent below 2003 demand.	**Consistent.** The project would facilitate development of housing within the city's Downtown, as well as the Sherwood Gateway Specific Plan Area and near or adjacent to transportation corridors currently served by bus stops and Class II and Class III bicycle lanes, which supports Policy 1.2, Programs under Goal 1, and Program 4.J of the proposed HEU which aims to promote mixed uses to reduce VMT. All housing units constructed under the proposed HEU would be subject to the requirements of the most recent iteration of CALGreen and locally adopted amendments, which include provisions for electric vehicle charging infrastructure, reducing dependence on gasoline powered vehicles.
2019 Integrated Energy Policy Report. The 2019 report highlights the implementation of California's innovative policies and the role they have played in establishing a clean energy economy, as well as provides more detail on several key energy policies, including decarbonizing buildings, increasing energy efficiency savings, and integrating more renewable energy into the electricity system.	**Consistent.** Development facilitated by the project would be required to comply with the LAMC Chapter 12.22, which mandates the implementation of Title 24. Compliance would include complying with the most updated rooftop solar requirements at the time of construction. Future development would also be required to comply with the City's Reach Code which is currently being revised, but would require all-electric construction for all newly constructed buildings. Electricity would be provided either by Silicon Valley Clean Energy (SVCE) or PG&E, which are required to generate electricity that would increase renewable energy resources to 60 percent by 2030 and 100 percent by 2045. As the City's main electricity provider, SVCE enrolls new customers in their GreenStart program, which sources 50 percent of electricity from renewable energy sources and 50 percent from carbon-free sources. Customers have the option to upgrade to SVCE's GreenPrime program which sources 100 percent of electricity from renewable energy sources (SVCE 2022). Additionally, Policies 7.1 and 7.2 aim to ensure the inclusion of energy efficiency measures in future development.
California Renewable Portfolio Standard. California's RPS obligates investor-owned utilities, energy service providers, and community choice aggregators to procure 33 percent total retail sales of electricity from renewable energy sources by 2020, 60 percent by 2030, and 100 percent by 2045.	**Consistent.** Electricity for future development would be provided either by Silicon Valley Clean Energy (SVCE) or PG&E, which are required to generate electricity that would increase renewable energy resources to 60 percent by 2030 and 100 percent by 2045. As the City's main electricity provider, SVCE enrolls new customers in their GreenStart program, which sources 50 percent of electricity from renewable energy sources and 50 percent from carbon-free sources. Customers have the option to upgrade to SVCE's GreenPrime program which sources 100 percent of electricity from renewable energy sources (SVCE 2022).
Energy Action Plan. In the October 2005, the CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the EAP II in February 2008 that supplements the earlier EAPs and examines the State's ongoing actions in the context of global climate change. The nine major action areas in the EAP include energy efficiency, demand	**Consistent.** Future development facilitated by the proposed project would be required to be constructed in accordance with the latest iteration of CALGreen, the California Energy Code, and any locally adopted amendments, which include requirements for the use of energy-efficient design and technologies as well as provisions for incorporating renewable energy resources into building design. Additionally, Policies 7.1 and 7.2 would ensure implementation of energy efficiency measures in all development facilitated under the project. Electricity would be provided by SVCE, which sources 50 percent of electricity from renewable energy sources and 50

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
response, renewable energy, electricity adequacy/reliability/infrastructure, electricity market structure, natural gas supply/demand/infrastructure, transportation fuels supply/demand/infrastructure, research/development/demonstration, and climate change.	percent from carbon-free sources under their GreenStart program. Customers have the option to upgrade to SVCE's GreenPrime program which sources 100 percent of electricity from renewable energy sources (SVCE 2022). Given these features, the project would facilitate implementation of the nine major action areas in the EAP.
AB 1007: State Alternative Fuels Plans. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-State production of biofuels without causing a significant degradation of public health and environmental quality. Bioenergy Action Plan, EO S-06-06. The EO establishes the following targets to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050.	**Consistent.** The project would not interfere with or obstruct the production of biofuels in California. Vehicles used by future residents would be fueled by gasoline and diesel fuels blended with ethanol and biodiesel fuels as required by CARB regulations. Pursuant to the City's Reach Code, new multi-family residences with less than or equal to 20 dwelling units would be required to install at least one Level 2 EV Ready space for each dwelling unit. For multi-family residences with more than 20 units, 25 percent of the dwelling units with parking spaces must include at least one Level 2 EV Ready space, and each remaining dwelling unit with parking spaces must include one Level 1 EV Ready space. Future development would also be required to comply with LAMC Chapter 12.22, which mandates the implementation of the most current version of Title 24. Title 24 contains requirements for EV spaces in new construction. Future development facilitated by the project would be required to comply with the most updated EV requirements in both the City's Reach Code and Title 24 at the time of construction.
Title 24, CCR – Part 6 (Building Energy Efficiency Standards) and Part 11 (CALGreen). The 2019 Building Energy Efficiency Standards move toward cutting energy use in new homes by more than 50 percent and will require installation of solar photovoltaic systems for single-family homes and multi-family buildings of three stories and less. The CALGreen Standards establish green building criteria for residential and nonresidential projects. The 2019 Standards include the following: increasing the number of parking spaces that must be prewired for electric vehicle chargers in residential development; requiring all residential development to adhere to the Model Water Efficient Landscape Ordinance; and requiring more appropriate sizing of HVAC ducts.	**Consistent.** Development facilitated by the project would be required to comply with the LAMC Chapter 12.22, which mandates the implementation of Title 24.

Furthermore, the City's General Plan and Climate Action Plan (CAP) also contains goals and policies related to energy efficiency and renewable energy. As discussed under Table 15 in Section 8, *Greenhouse Gas Emissions*, the proposed project would be consistent with recommended goals, policies, and actions in the City's CAP related to energy efficiency and renewable energy. Table 11 summarizes the project's consistency with the applicable General Plan policy. As shown therein, the proposed project would be consistent with the applicable General Plan policy and therefore would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. This impact would be less than significant.

Table 11 Project Consistency with Applicable General Plan Policies

Policies	Project Consistency
Natural Environment and Hazards Element	
Policy 8.1: Support the principles of reducing air pollutants through land use, transportation, and energy use planning.	**Consistent**: Future development facilitated by the proposed project would be required to be constructed in accordance with the latest iteration of CALGreen, the California Energy Code, and any locally adopted amendments, which include green building practices. Future development would also be required to comply with the City's Reach Code which would require all-electric construction for all newly constructed buildings. Additionally, Policies 7.1 and 7.2 would ensure implementation of energy efficiency measures in all development facilitated under the project.

Source: City of Los Altos 2002

LESS THAN SIGNIFICANT IMPACT

7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	☐	☐	☐	■
2. Strong seismic ground shaking?	☐	☐	☐	■
3. Seismic-related ground failure, including liquefaction?	☐	☐	☐	■
4. Landslides?	☐	☐	■	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
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?	☐	☐	☐	■
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?	☐	☐	☐	■
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?	☐	☐	☐	■
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	■	☐	☐

Environmental Setting

Regional and Local Geology

The City of Los Altos is part of the Coast Ranges geomorphic province. A geomorphic province is a naturally defined geologic region that displays a distinct landscape or landform according to its geology, faults, topographic relief and climate (Department of Conservation [DOC] 2002). The Coast Ranges are Northwest trending mountain ranges and valleys, running subparallel to the San Andreas Fault. They are composed of thick Mesozoic and Cenozoic sedimentary strata (DOC 2002).

The City of Los Altos is located in the northwest portion of Santa Clara County, approximately five miles west of San Francisco Bay at the southern end of the peninsula. The City's boundaries extend from Mountain View and Palo Alto to the north, Sunnyvale to the east, Cupertino to the south, and the town of Los Altos Hills to the west. The city spans an area of around 6.5 square miles, and has relatively low topography, with rolling terrain only in the southwest portion of the city.

Fault Zones

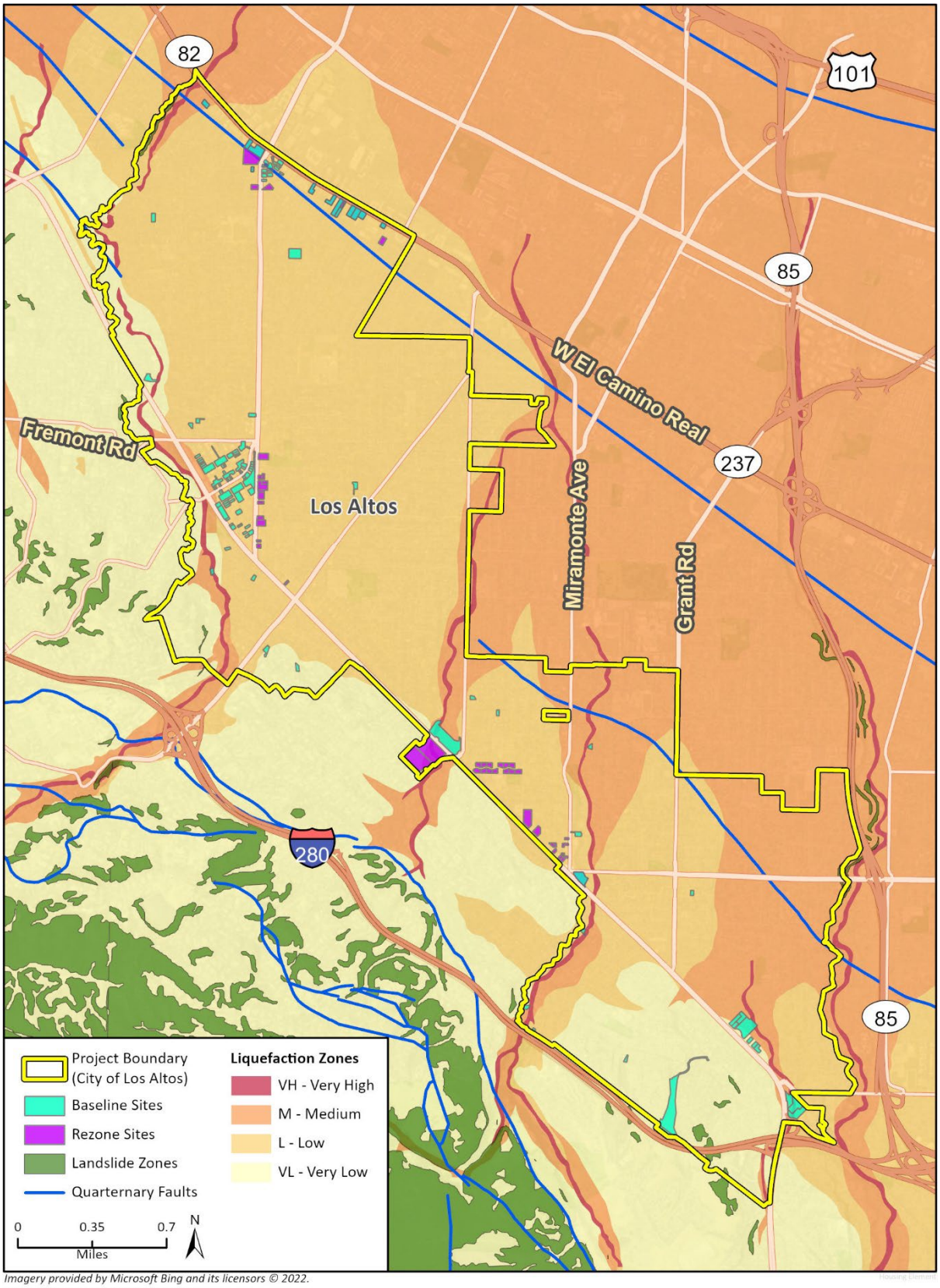
Similar to much of California, Los Altos is located in a seismically active region. The USGS defines Holocene-active faults as those that are likely to have moved one or more times (surface displacement) in the last 10,000 years (USGS, n.d.), while inactive faults have not had surface displacement within that period. Several faults are located near Los Altos. These major faults and fault zones include:

- The San Andreas Fault: Located around 5 miles west of Los Altos. The San Andreas Fault is the primary surface boundary between the Pacific and the North American plates. There have been numerous historic earthquakes along the San Andreas Fault, and it generally poses the greatest earthquake risk to California. The probability of experiencing a Magnitude 6.7 or greater earthquake along the San Andreas Fault within the next 30 years is 22 percent (Office of Emergency Services 2017).
- The Hayward Fault: Located around 16 miles east of Los Altos. The Hayward Fault is part of the wide plate boundary between the Pacific and the North American plates. The probability of experiencing a Magnitude 6.7 or greater earthquake along the Hayward Fault in the next 30 years is 33 percent (Office of Emergency Services 2017).
- The Calaveras Fault: Located around 23 miles Northeast from the City of Los Altos. The probability of experiencing a Magnitude 6.7 or greater earthquake along the Calaveras Fault in the next 30 years is 26 percent (Office of Emergency Services 2017).

In addition to primary hazards like surface fault ruptures, earthquakes also result in secondary hazards and impacts such as ground shaking, landslides, and liquefaction, which could cause widespread damage. No part of Los Altos is located within an identified earthquake fault zone as delineated on the Alquist-Priolo Earthquake Fault Zoning Map (DOC 2022a). An inactive quaternary fault[9] runs parallel to El Camino Real, as shown in Figure 6.

[9] A Quaternary fault is one that has been recognized at the surface and that has moved in the past 1.6 million years. That places fault movement within the Quaternary Period, which covers the last 2.6 million years (United States Geological Survey [USGS] 2022).

Figure 6 Faults, Landslide Zones, and Liquefaction Zones in Los Altos



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Additional data provided by CGS, 2022.

Ground Shaking

Seismically induced ground shaking covers a wide area and is greatly influenced by the distance of the site to the seismic source, soil conditions, and depth to groundwater. The USGS and Associated Bay Area Governments (ABAG) have worked together to map the likely intensity of ground-shaking throughout the Bay Area under various earthquake scenarios. The most intense ground-shaking scenario mapped in the vicinity assumes a 8.2 magnitude earthquake on the San Andreas Fault system (northern and peninsula segments). The predicted ground-shaking level from such an earthquake would be "severe shaking" throughout the city (ABAG 2022).

Liquefaction and Seismically Induced Settlement

Liquefaction is defined as the sudden loss of soil strength due to a rapid increase in soil pore water pressure resulting from seismic ground shaking. Liquefaction potential is dependent on such factors as soil type, depth to ground water, degree of seismic shaking, and the relative density of the soil. When liquefaction of the soil occurs, buildings and other objects on the ground surface may tilt or sink, and lightweight buried structures (such as pipelines) may float toward the ground surface. Liquefied soil may be unable to support its own weight or that of structures, which could result in loss of foundation bearing or differential settlement. Liquefaction may also result in cracks in the ground surface followed by the emergence of a sand-water mixture.

Los Altos sits on the very deep alluvial soils of the Santa Clara Valley floor, the soils of which contains silt, clay, sand, and gravel deposits, extending up to a depth of 4,000 to 5,000 feet throughout most of the city. Therefore, most of the city has low risk for liquefaction. According to the DOC, only a small portion of the western portion of the city near Foothill Expressway and University Avenue is subject to liquefaction (DOC 2022). As shown in Figure 6, one site in the northwestern portion of the city as well as several sites in the southern portion of the city and near Hale Creek and Permanente Creek are located on medium and very high liquefaction zones.

Seismically induced settlement occurs in loose to medium dense unconsolidated soil above groundwater. These soils compress (settle) when subject to seismic shaking. The settlement can be exacerbated by increased loading, such as from the construction of buildings. Settlement can also result solely from human activities including improperly placed artificial fill, and structures built on soils or bedrock materials with differential settlement rates.

Landslides

Landslides result when the driving forces that act on a slope (i.e., the weight of the slope material, and the weight of objects placed on it) are greater than the slope's natural resisting forces (i.e., the shear strength of the slope material). Slope instability may result from natural processes, such as the erosion of the toe of a slope by a stream, or by ground shaking caused by an earthquake. Slopes can also be modified artificially by grading, or by the addition of water or structures to a slope. Development that occurs on a slope can substantially increase the frequency and extent of potential slope stability hazards.

Areas susceptible to landslides are typically characterized by steep, unstable slopes in weak soil/bedrock units which have a record of previous slope failure. There are numerous factors that affect the stability of the slope, including: slope height and steepness, type of materials, material strength, structural geologic relationships, ground water level, and level of seismic shaking.

As shown in Figure 6, there are minimal landslide zones located within Los Altos. No housing inventory sites are located in a landslide zone.

Expansive Soils

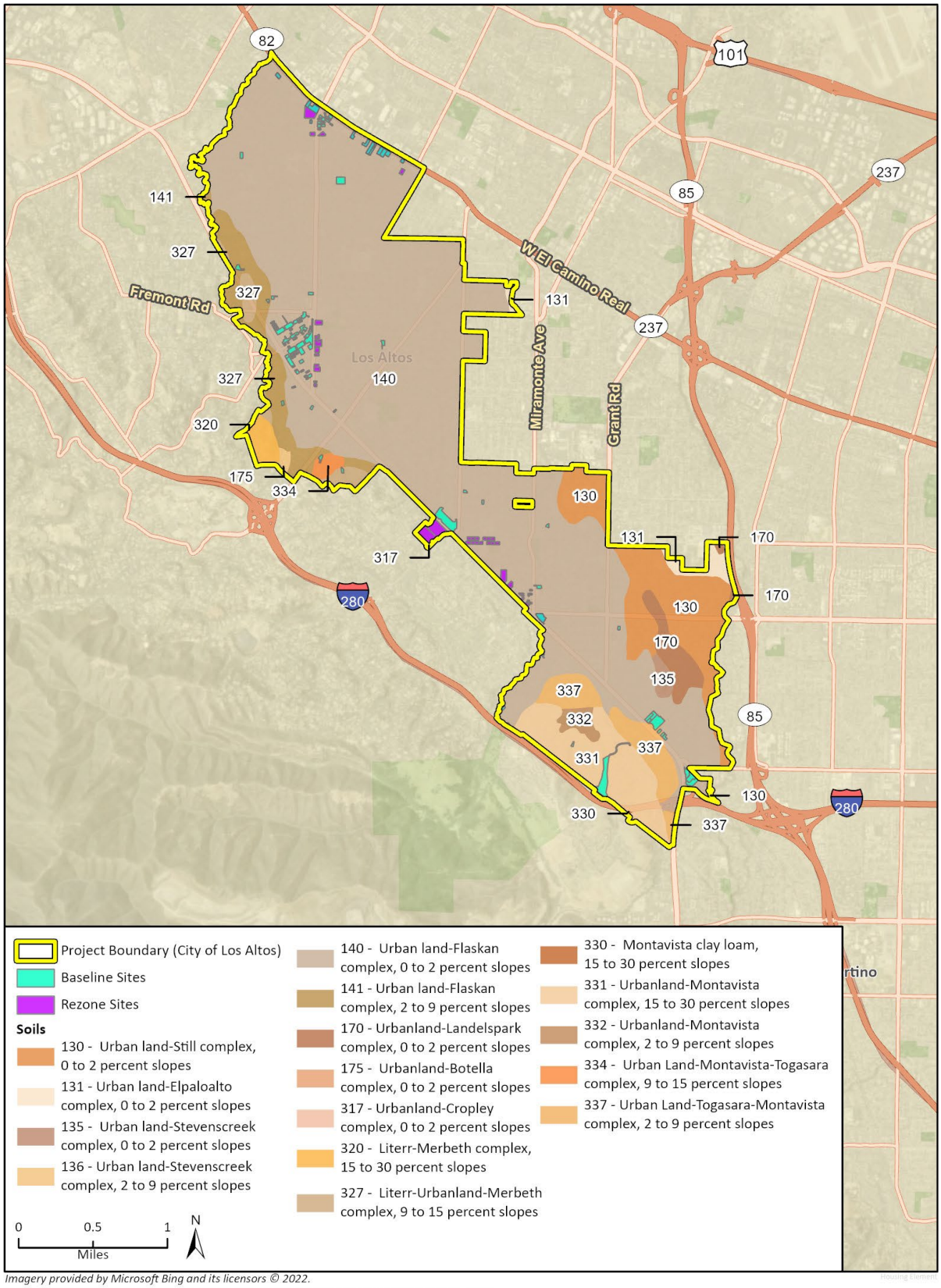
Expansive soils can change dramatically in volume depending on moisture content. When wet, these soils can expand; conversely, when dry, they can contract or shrink. Sources of moisture that can trigger this shrink-swell phenomenon include seasonal rainfall, landscape irrigation, utility leakage, and/or perched groundwater. Expansive soil can develop wide cracks in the dry season, and changes in soil volume have the potential to damage concrete slabs, foundations, and pavement. Special building/structure design or soil treatment are often needed in areas with expansive soils. Expansive soils are typically very fine-grained with a high to very high percentage of clay. The clay minerals present typically include montmorillonite, smectite, and/or bentonite. Linear extensibility is used to determine the shrink-swell potential of soils. The shrink-swell potential or expansivity is low if the soil has a linear extensibility of less than 3 percent; moderate if 3 to 6 percent; high if 6 to 9 percent; and very high if more than 9 percent. Figure 7 shows soil types within the city and Table 12 lists those soil types and describes their expansivity.

Table 12 Los Altos Soil Parameters

Map Unit #	Name	Expansivity[1]
130	Urban Land Still-Complex, 0 to 2 percent slopes	Moderate
131	Urban Land Elpaloalto Complex, 0 to 2 percent slopes	Moderate to Very High
135	Urban Land-Stevenscreek Complex, 0 to 2 percent slopes	Moderate
136	Urban Land-Stevenscreek Complex, 2 to 9 percent slopes	Moderate
140	Urban Land-Flaskan Complex, 0 to 2 percent slopes	Low to Moderate
141	Urban Land-Flaskan Complex, 2 to 9 percent slopes	Low to Moderate
170	Urban-Landelspark Complex, 0 to 2 percent slopes	Low
175	Urbanland-Botella Complex, 0 to 2 percent slopes	Low
317	Urbanland-Cropley Complex, 0 to 2 percent slopes	High
320	Literr-Merbeth Complex, 15 to 30 percent slopes	Moderate to High
327	Literr-Urbanland-Merbeth Complex, 9 to 15 percent slopes	Moderate to High
330	Montavista Clay Loam, 15 to 30 percent slopes	Low to Moderate
331	Urbanland-Montavista Complex, 15 to 30 percent slopes	Moderate to High
332	Urbanland-Montavista Complex, 2 to 9 percent slopes	Moderate to High
334	Urban Land-Montavista-Togasara Complex, 9 to 15 percent slopes	Moderate to High
337	Urban Land-Togasara-Montavista Complex, 2 to 9 percent slopes	Moderate to High

[1] Low expansivity: <3% linear extensibility
Moderate expansivity: 3-6% linear extensibility
High expansivity: 6-9% linear extensibility
Very high expansivity: >9% linear extensibility
Sources: USDA 2022, UC Davis 2022

Figure 7 Soils Types in Los Altos



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Additional data provided by Natural Resource Conservation Service Soil Survey Geographic , 2022.

Erosion

Erosion is the wearing away of the soil mantle by running water, wind or geologic forces. It is a naturally occurring phenomenon and ordinarily is not hazardous. However, excessive erosion can contribute to landslides, siltation of streams, undermining of foundations, and ultimately the loss of structures. Removal of vegetation tends to heighten erosion hazards.

Regulatory Setting

California Building Code

The California Building Code (CBC), Title 24, Part 2 provides building codes and standards for the design and construction of structures in California. It requires, among other things, seismically resistant construction and foundation and soil investigations prior to construction. The CBC also establishes grading requirements that apply to excavation and fill activities and requires the implementation of erosion control measures. The City is responsible for enforcing the CBC within Los Altos. Chapter 12.08 of the LAMC enforces the adoption of the California Building Code (Title 24, Part 2).

The referenced codes and standards include requirements for evaluations of geologic conditions at future project sites and design and construction standards to address geologic hazards. Geotechnical investigations are performed to identify the geologic conditions at a site and to evaluate whether a proposed project is feasible given the existing geological conditions. The Geotechnical report must be completed by a California licensed professional and must provide recommendations for foundation and structural design to address any geologic hazards. Such reports are required under the following conditions:

- New structures designed under the California Building Code in accordance with CBC 1803.5.11 and CBC 1803.5.12.
- New structures designed under the California Residential Code and located in a seismic hazard zone in accordance with CRC R401.4. This requirement does not apply to new accessory structures including utility sheds, garages and accessory dwelling units.
- New structures within a delineated earthquake fault zone:
- A single-family wood-frame or steel-frame dwelling exceeding two stories or when any dwelling is part of a development of four or more dwellings. Public Resources Code Chapter 7.5
- Multi-family and commercial of any kind.
- Alterations or additions to any structure within a seismic hazard zone which exceed either 50 percent of the value of the structure or 50 percent of the existing floor area of the structure. Public Resources Code Chapter 7.8
- In accordance with CBC 1803.5.2 and CRC R401.4.1 where design values exceed the presumptive values or the classification, strength or compressibility of the soil is in doubt.
- Where deep foundations will be used, a geotechnical investigation shall be conducted in accordance with CBC 1803.5.5.
- For new structures assigned to Seismic Design Category C, D, E or F, a geotechnical investigation shall be conducted in accordance with CBC 1803.5.11

Los Altos General Plan

The Natural Environment and Hazards Element of the Los Altos General Plan includes the following goals and policies related to geologic hazards:

Goal 1: Minimize risks of personal injury and property damage associated with seismic activity, landslides, and other geologic hazards.

Policy 1.1: Update acceptable levels of risk/life safety standards when necessary, and see that buildings are brought up to those standards, consistent with state law.

Policy 1.2: Avoid placement of critical facilities and high occupancy structures in areas known to be prone to ground failure during an earthquake.

Policy 1.3: Require soil analysis and erosion mitigation for all development proposed on sites known to be prone to erosion or ground failure.

Impact Analysis

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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?

There are no earthquake fault zones as delineated on the Alquist-Priolo Earthquake Fault Zoning Map in Los Altos (DOC 2021a). The closest active fault is the San Andreas Fault which is located approximately 5 miles west of the city. As a result, the likelihood of surface rupture occurring from active faulting that would affect future development under the proposed HEU is remote. No impact would occur.

NO IMPACT

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

CEQA is concerned with the impacts of a project on the environment, and not the impacts of the environment on a project. Therefore, a project would not have a significant environmental effect involving strong seismic ground shaking unless the project would increase the risk of harm to surrounding properties from such ground shaking. Any such impacts from any development project facilitated by the HEU is unlikely, not currently known, and wholly speculative at this time based upon available evidence. Therefore, the project would not have any known environmental impact involving strong seismic ground shaking.

Even if CEQA were concerned with impacts of the environment on projects, the impact would be less than significant. As with any site in the Bay Area region, development under the proposed HEU is susceptible to strong seismic ground shaking in the event of a major earthquake. Nearby faults include the San Andreas Fault, the Hayward Fault and the Calaveras Fault. These faults are capable of producing strong seismic ground shaking in the city.

Although nothing can ensure that residences and infrastructure do not fail under seismic stress, proper engineering can minimize the risk to life and property. Accordingly, building standards have been developed for construction in areas subject to seismic ground-shaking. Development facilitated by the proposed HEU would be required to comply with standards established by LAMC

Chapter 12.08 and 12.10, which adopts the California Building Code and the California Residential Code, respectively. The requirements of the California Building Code ensure that new habitable structures are engineered to withstand the expected ground acceleration at a given location. Further, California Building Code Chapter 18 requires that actions recommended in a site-specific soil investigation are incorporated into the construction of each structure. Additionally, the project would promote infill development, which may involve replacing older buildings subject to seismic damage with newer structures built to current seismic standards that could better withstand the adverse effects of strong ground shaking. Although the risk of sustaining an earthquake with higher ground accelerations can never be completely eliminated, compliance with all applicable provisions of the California Building Code and the LAMC would ensure that potential impacts from ground-shaking would be minimized to the extent possible.

Conformance with the requirements of the California Building Code, the California Residential Code, and LAMC would reduce impacts related to seismic ground shaking.

NO IMPACT

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

CEQA is concerned with the impacts of a project on the environment, and not the impacts of the environment on a project. Therefore, a project would not have a significant environmental effect involving seismic-related ground failure, including liquefaction, unless the project would increase the risk of harm to surrounding properties from such geologic hazards. Any such impacts from any development project facilitated by the HEU is unlikely, not currently known, and wholly speculative at this time based upon available evidence. Therefore, the project would not have any known environmental impact involving seismic-related ground failure, including liquefaction.

Even if CEQA were concerned with impacts of the environment on projects, the impact would be less than significant. As shown on Figure 6, although the majority of inventory sites are not located in liquefaction zones, some would be located on high to very high liquefaction zones within the City. However, future development facilitated by the proposed HEU would be subject to applicable policies within the Natural Environment and Hazards Element of the Los Altos General Plan, specifically Policy 1.3, requires soil analysis and erosion mitigation for all development proposed on sites know to be prone to erosion or ground failure. In addition, LAMC Section 13.20.070 (Required Soil Report) requires preparation of a preliminary soils report to identify soil problems which would lead to structural defects and incorporate corrective actions to prevent structural damage. Policy 1.3 and LAMC Section 13.20.070 would require preparation of a soils analysis, which would identify potentially liquefiable soils on the housing sites. Chapter 18 of the California Building Code also requires that actions recommended in a site-specific soil investigation are incorporated into the construction of each structure. Compliance with State and City requirements would reduce seismic ground shaking impacts with current engineering practices and the project would not exacerbate liquefaction potential in the area. As such, the proposed HEU would not directly or indirectly cause substantial adverse effects from liquefaction risk.

NO IMPACT

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

As shown in Figure 6, no proposed housing sites are located on or in proximity to landslide-prone areas. Also, development facilitated by the proposed HEU would be required to comply with the Public Resources Code (PRC) Section 2690-2699.6, *Seismic Hazards Mapping Act,* Chapter 12.08 and 12.10 of the LAMC, which adopts the California Building Code (CBC) and the California Residential Code, respectively, and the City's design review process, which regulates and provides requirements for development on steeper slopes. Furthermore, development facilitated by the proposed HEU would be required to adhere to Policy 1.3 of the Natural Environment and Hazards Element of the Los Altos General Plan and LAMC Section 13.20.070 which would require soil analysis and erosion mitigation and would reduce impacts to landslides to a less than significant level. Therefore, the impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

The proposed HEU would mostly include infill development in undeveloped and underutilized areas and rezoning to allow for increased density. Demolition and construction activities would be required to comply with CBC, Appendix Section J110, Erosion Control Standards, pursuant to Chapter 12.08 of the LAMC, which ensures appropriate erosion and stormwater pollution control during grading and construction activities.

Construction activities that occur on more than one acre are required to obtain a National Pollutant Discharge Elimination System (NPDES) Construction General Permit. NPDES requires the development of a storm water pollution prevention plan (SWPPP), which includes best management practices (BMP) to reduce erosion and topsoil loss from stormwater runoff. BMP examples generally include an effective combination of erosion and sediment controls, which include barriers such as silt fences, hay bales, drain inlet protection, or gravel bags.

As discussed under checklist questions (a.3), (a.4), and (c) above, development facilitated under the proposed HEU would also be required to comply with Policy 1.3 of the Natural Environment and Hazards Element of the Los Altos General Plan, which would require soil analysis and erosion mitigation in order to prevent excessive erosion and runoff. Therefore, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project 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?

CEQA is concerned with the impacts of a project on the environment, and not the impacts of the environment on a project. Therefore, a project would not have a significant environmental effect involving landslides, lateral spreading, subsidence, liquefaction, or collapse, unless the project would increase the risk of harm to surrounding properties from such geologic hazards. Any such impacts from any development project facilitated by the HEU is unlikely, not currently known, and wholly speculative at this time based upon available evidence. Therefore, the project would not have any known environmental impact involving landslides, lateral spreading, subsidence, liquefaction, or collapse.

Moreover, as shown in Figure 6, no proposed housing sites are located on or in proximity to landslide-prone areas. Development facilitated by the proposed HEU would be required to comply with the Public Resources Code (PRC) Section 2690-2699.6, *Seismic Hazards Mapping Act,* Chapter 12.08 and 12.10 of the LAMC, which adopts the California Building Code (CBC) and the California Residential Code, respectively, and the City's design review process, which regulates and provides requirements for development on steeper slopes. The project would also facilitate development that would replace older buildings subject to seismic damage with newer structures built to current seismic standards that could better withstand the adverse effects associated with unstable soils and liquefaction. Furthermore, development facilitated by the proposed HEU would be required to adhere to Policy 1.3 of the Natural Environment and Hazards Element of the Los Altos General Plan and LAMC Section 13.20.070 which would require soil analysis and erosion mitigation and would reduce impacts to landslides, lateral spreading, subsidence, liquefaction, and collapse.

NO IMPACT

d. Would the project 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?

Soils that volumetrically increase (swell) or expand when exposed to water and contract when dry (shrink) are considered expansive soils. The potential for soil to shrink and swell depends on the amount and types of clay in the soil. Highly expansive soils can cause structural damage to foundations and roads without proper structural engineering and are less suitable or desirable for development than non-expansive soils because of the necessity for detailed geologic investigations and costlier grading applications.

CEQA is concerned with the impacts of a project on the environment, and not the impacts of the environment on a project. Therefore, a project would not have a significant environmental effect involving expansive soils unless the project would increase the risk of harm to surrounding properties from such geologic hazards. Any such impacts from any development project facilitated by the HEU is unlikely, not currently known, and wholly speculative at this time based upon available evidence. Therefore, the project would not have any known environmental impact involving expansive soils.

Even if CEQA were concerned with impacts of the environment on projects, the impact would be less than significant. As shown in Table 12, only map unit 130 (Urban Land Elpaloalto Complex, 0 to 2 percent slopes) has moderate to very high soil expansivity. As shown in Figure 7, no housing sites are located on map unit 130. Table 12 also shows moderate to high soil expansivity in map units 320 (Literr-Merbeth Complex, 15 to 30 percent slopes), 327 (Literr-Urbanland-Merbeth Complex, 9 to 15 percent slopes), 331 (Urbanland-Montavista Complex, 15 to 30 percent slopes), 332 (Urbanland-Montavista Complex, 2 to 9 percent slopes), 334 (Urban Land-Montavista-Togasara Complex, 9 to 15 percent slopes), and 337 (Urban Land-Togasara-Montavista Complex, 2 to 9 percent slopes). According to Figure 7, only three housing sites are located on map unit 327, two housing sites on map unit 331, and one housing site on map unit 334. Future development would be required to comply with the Natural Environment and Hazards Element of the Los Altos General Plan, which includes goals and policies designed to address potential geologic impacts. Consistent with Section 1803 of the CBC, Policy 1.3 of the Los Altos General Plan would require soil analysis and erosion mitigation which would identify areas of expansive soils and require corrective action to reduce impacts to a less than significant level. Further, LAMC Section 13.20.070 (Required Soil Report) requires preparation of a preliminary soils report to identify the presence of expansive soils which would lead to structural defects and incorporate corrective actions to prevent structural damage.

The CBC also includes requirements to address soil-related hazards. Typical measures to treat hazardous soil conditions involve removal of soil or fill materials, proper fill selection, and compaction. In cases where soil remediation is not feasible, the CBC requires structural reinforcement of foundations to resist the forces of expansive soils. This would ensure that the potential for projects to occur on expansive soils such that substantial direct or indirect risks to life or property to occur would be reduced.

NO IMPACT

e. Would the project 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?

Los Altos is served by the City's established wastewater system. The proposed HEU would facilitate development on undeveloped or underutilized sites and would rezone sites to allow for increased density. These sites are and would continue to be served by the City's wastewater system. The project would not include the use of septic tanks or alternative wastewater disposal systems. There would be no impact.

NO IMPACT

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows, etc.). Paleontological resources are not found in "soil" but are contained within the geologic deposits or bedrock that underlies the soil layer. Typically, fossils are greater than 5,000 years old (i.e., older than middle Holocene in age) and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP] 2010). Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. It is possible to evaluate the potential for geologic units to contain scientifically important paleontological resources, and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they are discovered during construction of a development project.

Rincon Consultants evaluated the paleontological sensitivity of the geologic units that underlie the project site to assess the project's potential for significant impacts to scientifically important paleontological resources. The analysis was based on the results of a paleontological locality search and a review of existing information in the scientific literature regarding known fossils within geologic units mapped at the project site. According to the SVP (2010) classification system, geologic units can be assigned a high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources. Following the literature review, a paleontological sensitivity classification was assigned to each geologic unit mapped within the project site. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units.

According to the geologic map of Brabb et al. (2000) and as shown on Figure 8, the City of Los Altos is underlain by five geologic units: Quaternary stream channel deposits, Quaternary natural levee deposits, Quaternary (Holocene) alluvial fan and fluvial deposits, Quaternary (Pleistocene) alluvial fan and fluvial deposits, and the Santa Clara Formation.

Quaternary stream channel deposits underlie the various creeks in Los Altos including Stevens Creek, Permanente Creek, Hale Creek, and Adobe Creek. Quaternary stream channel deposits consist of poorly to well-sorted silt, sand, or sandy gravel with some cobbles and are Holocene in age (Brabb et al. 2000). Quaternary stream channel deposits are too young (i.e., less than 5,000 years old) to preserve paleontological resources (SVP 2010). Therefore, Quaternary stream channel deposits have low paleontological sensitivity.

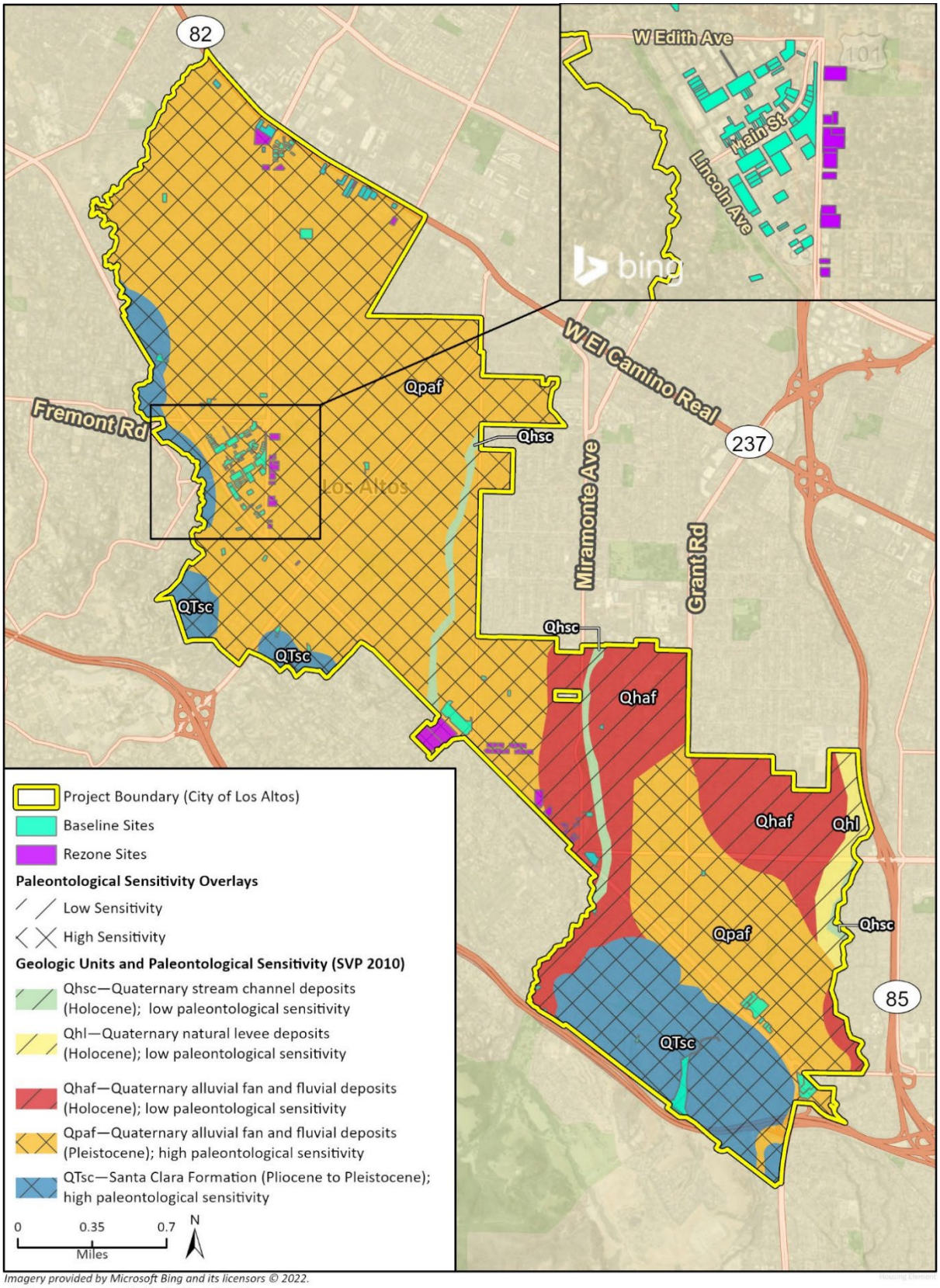
Quaternary natural levee deposits are found along Stevens Creek in eastern Los Altos. Quaternary natural levee deposits consist of loose, moderately to well-sorted sandy silt grading upward to silty clay and are Holocene in age (Brabb et al. 2000). Quaternary natural levee deposits are too young (i.e., less than 5,000 years old) to preserve paleontological resources (SVP 2010). Therefore, Quaternary natural levee deposits have low paleontological sensitivity.

Quaternary (Holocene) alluvial fan and fluvial deposits underlie much of eastern Los Altos. Quaternary (Holocene) alluvial fan and fluvial deposits consist of brown or tan, sand or gravel that grades upward to sandy or silty clay and are Holocene in age (Brabb et al. 2000). Fossil discoveries in areas mapped as Holocene alluvial sediments in Santa Clara County demonstrate that Holocene-aged alluvial fan and fluvial deposits may be as thin as 9 feet in some areas and are underlain by Pleistocene-aged sediments (Maguire and Holroyd 2016). Quaternary (Holocene) alluvial fan and fluvial deposits are too young (i.e., less than 5,000 years old) to preserve paleontological resources (SVP 2010). Therefore, Quaternary (Holocene) alluvial fan and fluvial deposits have low paleontological sensitivity.

Quaternary (Pleistocene) alluvial fan and fluvial deposits underlie large portions of Los Altos. Quaternary (Pleistocene) alluvial fan and fluvial deposits consist of brown, gravelly or clayey sand that grades upward into sandy clay and are Pleistocene in age (Brabb et al. 2000). Pleistocene alluvial sediments have produced significant vertebrate fossils throughout Santa Clara County, including mammoth (*Mammuthus*), ground sloth (*Paramylodon*), camel (*Camelops*), peccary (*Platygonus*), pronghorn (*Capromeryx*), rabbit, rodents, and reptiles (Jefferson 2010; Maguire and Holroyd 2016; Paleobiology Database [PBDB] 2022; University of California Museum of Paleontology [UCMP] 2022). Given this fossil-producing history, Quaternary (Pleistocene) alluvial fan and fluvial deposits have high paleontological sensitivity.

The Santa Clara Formation underlies portions of southern and western Los Altos. The Santa Clara Formation consists of gray to reddish-brown, moderately consolidated, conglomerate, sandstone, and mudstone arranged in irregular and lens-like beds and is Pleistocene to Pliocene in age (Brabb et al. 2000). The Santa Clara Formation contains several significant paleontological resources in Santa Clara County yielding taxa such as American cheetah (*Miracinonyx*), bison (*Bison*), horse (*Equus*), deer (Cervidae), fish, plants, and invertebrates (PBDB 2022; UCMP 2022). Given this fossil, producing history, the Santa Clara Formation has high paleontological sensitivity.

Figure 8 Geologic Map and Paleontological Sensitivity of Los Altos



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Additional imagery provided by Brabb et al. 2000

Ground disturbance in previously undisturbed sediments with high paleontological sensitivity may result in significant impacts to paleontological resources. However, potentially significant impacts to paleontological resources can only be determined once a specific project has been proposed because the effects are highly dependent on both the individual project site conditions (e.g., presence of previously disturbed sediments or artificial fill) and the characteristics of the proposed ground disturbance (e.g., depth, total volume, type of construction). Ground disturbing activities associated with construction facilitated by this project, particularly in areas that have not previously been developed with urban uses, have the potential to damage or destroy paleontological resources that may be present on or below the ground surface in areas of high paleontological sensitivity. Consequently, damage to or destruction of fossils could occur due to development under the proposed HEU. This impact would be potentially significant.

Mitigation Measures

The following mitigation measure is required:

GEO-1 Protection of Paleontological Resources

The City shall establish the following Standard Condition of Approval for projects requiring approval in areas of high paleontological sensitivity (Quaternary (Pleistocene) alluvial fan and fluvial deposits and Santa Clara Formation) and that involve ground disturbance below the level of past disturbance:

PALEONTOLOGICAL RESOURCES ASSESSMENT

Prior to initial ground disturbance, the applicant shall retain a Qualified Professional Paleontologist, as defined by the SVP (2010), to conduct a paleontological resources assessment (PRA). The PRA shall determine the age and paleontological sensitivity of geologic formations underlying the proposed disturbance area, consistent with SVP (2010) guidelines for categorizing paleontological sensitivity of geologic units within a project area.

If underlying formations are found to have a high potential for paleontological resources, the Qualified Professional Paleontologist shall create a Paleontological Mitigation and Monitoring Program, which will be approved by the City and contain the following elements:

PALEONTOLOGICAL WORKER ENVIRONMENTAL AWARENESS PROGRAM (WEAP)

Prior to the start of construction, the Qualified Professional Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and procedures for notifying paleontological staff should fossils be discovered by construction staff.

PALEONTOLOGICAL MONITORING

Full-time paleontological monitoring shall be conducted during ground disturbing construction activities (i.e., grading, trenching, foundation work) in sediments assigned a high paleontological sensitivity. Paleontological monitoring shall be conducted by a qualified Paleontological Resources Monitor, as defined by the SVP (2010). The duration and timing of the monitoring will be determined by the Qualified Professional Paleontologist based on the observation of the geologic setting from initial ground disturbance, and subject to the review and approval by the City. If the Qualified Professional Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions once the full depth of excavations

has been reached, they may recommend that monitoring be reduced to periodic spot-checking or ceased entirely. Monitoring shall be reinstated if any new ground disturbances are required, and reduction or suspension shall be reconsidered by the Qualified Professional Paleontologist at that time. In the event of a fossil discovery by the paleontological monitor or construction personnel, all work in the immediate vicinity of the find shall cease. A Qualified Professional Paleontologist shall evaluate the find before restarting construction activity in the area. If it is determined that the fossil is scientifically significant, then it shall be salvaged, identified to the lowest possible taxonomic level, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps.

Upon completion of ground disturbing activity (and curation of fossils if necessary) the Qualified Professional Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to the City. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.

Significance After Mitigation

Implementation of Mitigation Measure GEO-1 would ensure procedures are in place to avoid destruction of paleontological resources. Impacts would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	■	☐
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	■	☐

Environmental Setting

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere, and natural processes, such as oceanic evaporation, largely determine its atmospheric concentrations. GHGs are emitted by natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are usually by-products of fossil fuel combustion, and CH_4 results from off-gassing associated with agricultural practices and landfills. Human-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6 (U.S. EPA 2021). Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (IPCC 2021).[10]

In 2018, Los Altos generated approximately 1,128 MT CO_2e from government activities, and 110,192 MT CO_2e from community activities, for a total of 111,320 MT CO_2e. For the community sector, on-road motor vehicles were the largest source of GHG emissions within Los Altos, generating approximately 65 percent of total community GHG emissions. Residential energy was the second largest GHG emission source, generating approximately 32 percent of total community GHG emissions. Commercial energy contributed approximately 7 percent, while solid waste and water

[10] The Intergovernmental Panel on Climate Change's (2021) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for methane, consistent with the Intergovernmental Panel on Climate Change's (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWPs from the Fourth Assessment Report.

and wastewater represented the smallest GHG emissions sources at 2 percent and 1 percent, respectively. Table 13 provides a summary of the 2018 government and community GHG emissions inventory results by GHG emission sector.

Table 13 2018 Community GHG Emissions Inventory Results by Sector

GHG Emissions Sector	GHG Emissions (MT CO_2e)	Percent of GHG Emissions Totals
Government	**1,128**	**100%**
Employee Commute	445	39%
Vehicle Fleet	351	31%
Solid Waste Facilities	172	15%
Buildings and Facilities	134	12%
Process and Fugitive Emissions	21	2%
Water and Wastewater Treatment Facilities	5	<1%
Community	**110,192**	**100%**
Transportation and Mobile Sources	71,531	65%
Residential Energy	35,661	32%
Commercial Energy	7,535	7%
Solid Waste	2,653	2%
Water and Wastewater	1,063	1%

MT CO_2e = metric tons of carbon dioxide equivalent

Totals may not add due to rounding.

Source: City of Los Altos 2022a

Impact Analysis

a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

In response to climate change, California implemented AB 32, the "California Global Warming Solutions Act of 2006." AB 32 requires the reduction of statewide GHG emissions to 1990 emissions levels (essentially a 15 percent reduction below 2005 emission levels) by 2020 and the adoption of rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions. On September 8, 2016, the Governor signed SB 32 into law, extending AB 32 by requiring the State to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, the CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program and the Low Carbon Fuel Standard, and implementation of recently adopted policies and legislation, such as SB 1383 (aimed at reducing short-lived climate pollutants including methane, hydrofluorocarbon gases, and anthropogenic black carbon) and SB 100 (discussed further below). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends local governments adopt policies and locally appropriate quantitative thresholds consistent with a statewide per capita goal of 6 metric tons MT CO_2e by 2030 and 2 MT

CO_2e by 2050 (CARB 2017). On September 10, 2018, the Governor signed Executive Order (EO) B-55-18, which identifies a new goal of carbon neutrality by 2045 and supersedes the goal established by EO S-3-05.[11] CARB has been tasked with including a pathway toward the EO B-55-18 carbon neutrality goal in the next Scoping Plan update which is currently being drafted.

BAAQMD recently adopted updated thresholds for evaluating the significance of climate impacts from plan-level projects on April 20, 2022. The updated thresholds state that a plan-level project must either meet the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045; or be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

The City of Los Altos adopted its Climate Action and Adaptation Plan (CAAP) in March 2022 as an update to the 2013 Climate Action Plan (CAP), which aims to achieve carbon neutrality by 2035. Although the City's CAAP includes a GHG emissions inventory; a reduction target of 67,000 MT CO_2e by 2035; forecast projected emissions for activities covered by the CAAP; reduction measures in the form of strategies, goals, and actions; and a monitoring and reporting process, it was not adopted in following comprehensive environmental review and therefore conservatively does not consider it to be a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b) for the purpose of this analysis. However, the CAAP outlines guidance to reduce the emissions in Los Altos by approximately 67,000 MT CO_2e by 2035 in order to reach the goal of carbon neutrality by 2035. Therefore, the CAAP is consistent with the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045, and the project would result in a less than significant impact if it would be consistent with the City's CAAP. As shown below under checklist question (b), the proposed HEU would be consistent with applicable CAAP strategies and actions. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

Potential Emissions Generated by the Proposed HEU

For informational purposes, GHG emissions associated with development under the proposed HEU are shown in Table 14. Since the city's Reach Code requires all-electric units in future construction, it was assumed that the natural gas demand estimated for the project would instead be supplied by electricity to account for increased electricity usage. As shown in the table, annual emissions from full buildout of the project's envisioned increase of 1,648 dwelling units over existing conditions would be 8,011 MT of CO_2e per year. With a project increase in population of 4,582 over existing conditions, this would result in an increase of 1.7 MT of CO_2e per service population per year. This analysis is provided for informational purposes only because the BAAQMD significance thresholds are based on consistency with the City's CAAP, as discussed above.

[11] Executive Order (EO) S-3-05, signed by Governor Arnold Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra Nevada snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the EO established total GHG emission targets for the state. Specifically, emissions are to be reduced to the 2000 level by 2010, the 1990 level by 2020, and to 80 percent below the 1990 level by 2050.

Table 14 Operational GHG Emissions

Emission Source	Annual Emissions (MT of CO_2e)
Operational	
Area	20
Energy	3
Mobile	7,481
Waste	439
Water	67
Operational Total	**8,011**
Project Population Increase	4,582
MT of CO_2e per Service Population	**1.7**

Source: See Appendix C for modeling results. Trip generation information provided by Hexagon Transportation Consultants, Inc.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

As discussed under checklist question (a) above, the City of Los Altos adopted its Climate Action and Adaptation Plan (CAAP) in March 2022 as an update to the 2013 Climate Action Plan (CAP), which aims to achieve carbon neutrality by 2035. Table 15 shows the project's consistency with applicable CAAP strategies and actions. As shown in Table 15, the proposed HEU would be consistent with applicable goals and actions from the City's CAAP. This impact would be less than significant.

Table 15 Project Consistency with Applicable Climate Action and Adaptation Plan Actions

Recommended Actions	Project Consistency
Transportation	
Action 1.2A: Support transit-oriented development. Require increased residential and commercial density and diversity along main corridors and commercial areas, including affordable multi-family housing and mixed-use developments. Encourage Transit-Oriented Development along major bus routes within and outside of the City to attract new employers and better serve the daily needs of residents and employees. Set a target of at least a 20% increase in the percent of the city's population living in high-density Transit-Oriented Development by 2035. Integrate with the City's Housing Element (ensure meeting RHNA commitments encourages high-density & affordable housing in transit-accessible/walkable areas).	**Consistent:** The project would facilitate development of housing in the Downtown, near commercial areas, and near or adjacent to transportation corridors currently served by bus stops and Class II and Class III bicycle lanes.

Recommended Actions	Project Consistency
Action 1.5A: Increase the number of available Level 2 EV charging stations in workplace, commercial and multifamily areas. Increase the number of available Level 2 EV charging stations at businesses with >50 employees, multifamily homes of >10 units, and in commercial areas. Adopt an Electric Vehicle Supply Equipment Master Plan to identify number and location of EVSE.	**Consistent:** Pursuant to the City's Reach Code, new multi-family residences with less than or equal to 20 dwelling units would be required to install at least one Level 2 EV Ready space for each dwelling unit. For multi-family residences with more than 20 units, 25 percent of the dwelling units with parking spaces must include at least one Level 2 EV Ready space, and each remaining dwelling unit with parking spaces must include one Level 1 EV Ready space. Future development would also be required to comply with LAMC Chapter 12.22, which mandates the implementation of the most current version of Title 24. Title 24 contains requirements for EV spaces in new construction. Future development facilitated by the project would be required to comply with the most updated EV requirements in both the City's Reach Code and Title 24 at the time of construction.
Action 1.6A: Phase out off-road fossil fuel engines such as landscaping equipment. Accelerate phase-out of small off-road fossil fuel engines such as landscaping equipment through bans, replacement ordinances, and/or incentives for electric alternatives. Work to reduce construction-related emissions. Form an Environmental Commission subcommittee to develop rules and/or ordinances.	**Consistent:** Pursuant to LAMC Section 6.16.070, residents of new future development are prohibited from using gasoline-powered leaf blowers. Additionally, as discussed in Section 6, *Energy*, construction activities associated with reasonably foreseeable development under the proposed HEU would be required to utilize fuel-efficient equipment consistent with federal and State regulations, which would reduce the usage of energy and emittance of GHG.
Energy	
Action 2.1B: Increase residential and commercial energy efficiency. Develop a program to increase energy efficiency in existing residential buildings including wall and ceiling insulation, roof replacements, new ducting and windows, lighting upgrades, and outdoor amenities upgrades. Identify outside funding to perform upgrades identified in energy audits performed under action 2.1 A, and ensure eligible residents and businesses take advantage of all available energy efficiency incentive programs.	**Consistent.** Development facilitated by the project would be required to comply with the LAMC Chapter 12.22, which mandates the implementation of Title 24. Compliance would include complying with the most updated rooftop solar requirements at the time of construction. Future development would also be required to comply with the City's Reach Code which is currently being revised, but would require all-electric construction for all newly constructed buildings. Electricity would be provided either by Silicon Valley Clean Energy (SVCE) or PG&E, which are required to generate electricity that would increase renewable energy resources to 60 percent by 2030 and 100 percent by 2045. As the City's main electricity provider, SVCE enrolls new customers in their GreenStart program, which currently sources 50 percent of electricity from renewable energy sources and 50 percent from carbon-free sources. Customers have the option to upgrade to SVCE's GreenPrime program which sources 100 percent of electricity from renewable energy sources (SVCE 2022).
Action 2.5A: Increase community solar capacity. Increase solar panel requirements in new construction from 4kW to 6kW minimum, and add solar panel requirement for large additions and remodels (>4kW). Ensure residents and businesses are aware of and take advantage of incentive programs for solar panels.	**Consistent.** Pursuant to Title 24, most residences would be required to include rooftop solar systems. LAMC Chapter 12.70 serves to expedite and streamline the solar permitting process for small residential rooftop solar systems in order to incentivize new construction to include solar.

Recommended Actions	Project Consistency
Resource Conservation	
Action 3.1A: Increase the landfill diversion rate. Increase landfill diversion rate to 90% by 2030 and 95% by 2035, negotiated in the next Franchise Agreement. Launch an education and awareness campaign for residents and businesses to help promote best practices.	**Consistent**: In accordance with LAMC Section 6.12.050, multi-family residences with five or more units would be required to provide recycling service for tenants. Future residents would also be required to recycle organics pursuant to SB 1383.
Action 3.1C: Reduce waste from demolition, construction and building materials. Develop an ordinance requiring the deconstruction of old buildings instead of demolition and the recycling/re-use of materials. Provide incentives to builders for the use of environmentally friendly construction materials.	**Consistent**: Pursuant to Chapter 6.14 of the LAMC, future projects would be required to comply with construction waste management practices to divert at least 65 percent of construction and demolition debris.
Action 3.2A: Increase communitywide water efficiency. Increase education and awareness of water efficiency programs through Calwater and other organizations. Continue to support implementation of the 2015 UWMP through enforcement of the 2015 Model Water Efficient Landscape Ordinance. Develop an ordinance requiring conversion of grass lawns to low-water landscaping. Consider an update to the building code prohibiting new grass lawns.	**Consistent:** Future development that needs new or expanded water service would be required to comply with the California Water Service Company's and CALGreen's water efficiency regulations, and the state's Model Water Efficiency Landscape Ordinance to reduce indoor and outdoor water use.
Climate Risk	
Action 6.1C: Expand green infrastructure program to reduce impermeable surface areas and capture runoff from paved areas. Implement porous paving in sidewalks, parking lots and driveways, and other water percolation methods like bioswales to reduce stormwater runoff to streets.	**Consistent:** Future development facilitated by the proposed HEU would be required to comply with stormwater pollution prevention measures outlined in Chapter 10.16 of the LAMC, which would reduce stormwater runoff to streets.

Source: City of Los Altos 2022a

LESS THAN SIGNIFICANT IMPACT

9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
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?	☐	☐	■	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	■	☐	☐
d. Be located on a site that is included on a list of hazardous material 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?	☐	■	☐	☐
e. For a project located in 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?	☐	☐	☐	■
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	■	☐

Regulatory Setting

Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA)

These acts established a program administered by the USEPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

U.S. Department of Transportation Regulations

DOT prescribes strict regulations for the safe transportation of hazardous materials, including requirements for hazardous waste containers and licensed haulers that transport hazardous waste on public roads. The Secretary of the DOT receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in in 49 U.S. Code (U.S.C.) Section 5101 et seq. The Secretary is authorized to issue regulations to implement the requirements of 49 U.S.C. The Pipeline and Hazardous Materials Safety Administration, formerly the Research and Special Provisions Administration, was delegated the responsibility to write the hazardous materials regulations, which are contained in Title 49 of the CFR Parts 100-180. Title 49 of the CFR, which contains the regulations set forth by the HMTA, specifies requirements and regulations with respect to the transport of hazardous materials. It requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Under the HMTA, the Secretary "may authorize any officer, employee, or agent to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to: (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any 'person' in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any 'person' of hazardous materials in commerce.

Department of Toxic Substances Control

As a department of the California Environmental Protection Agency, the DTSC is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of RCRA and the California Health and Safety Code.

The DTSC also administers the California Hazardous Waste Control Law (HWCL) to regulate hazardous wastes. While the HWCL is generally more stringent than RCRA, until the USEPA approves the California program, both state and federal laws apply in California. The HWCL lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Government Code Section 65962.5 requires the DTSC, the State Department of Health Services, the State Water Resources Control Board, and CalRecycle to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the state. The Secretary for Environmental Protection consolidates the information submitted by these agencies

and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included.

If any soil is excavated from a site containing hazardous materials, it would be considered a hazardous waste if it exceeded specific criteria in Title 22 of the California Code of Regulations. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

California Occupational Safety and Health Act – California Labor Code, Section 6300 et seq.

The California Occupational Safety and Health Act of 1973 addresses California employee working conditions, enables the enforcement of workplace standards, and provides for advancements in the field of occupational health and safety. The Act also created CalOSHA, the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. CalOSHA's standards are generally more stringent than federal regulations. Under the former, the employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure. The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings. At sites known or suspected to be contaminated by hazardous materials, workers must have training in hazardous materials operations and a Site Health and Safety Plan must be prepared, which establishes policies and procedures to protect workers and the public from exposure to potential hazards at the contaminated site.

California Code of Regulations, Title 22, Hazardous Waste Management

At the State level, under Title 22, Division 4.5 of the CCR, DTSC regulates hazardous waste in California primarily under the authority of the Federal RCRA and the California Health and Safety Code. The HWCL, under CCR 22, Chapter 30, establishes regulations that are similar to RCRA but more stringent in their application and empowers the DTSC to administer the State's hazardous waste program and implement the federal program in California. The DTSC is responsible for permitting, inspecting, ensuring compliance, and imposing corrective action programs to ensure that entities that generate, store, transport, treat, or dispose of potentially hazardous materials and waste comply with federal and State laws. The DTSC defines hazardous waste as waste with a chemical composition or other properties that make it capable of causing illness, death, or some other harm to humans and other life forms when mismanaged or released into the environment. The DTSC shares responsibility for enforcement and implementation of hazardous waste control laws with the SWRCB and, at the local level, the LARWQCB, and city and county governments.

California Code of Regulations Title 23, Chapter 15 Discharges of Hazardous Waste to Land Section 2511(b)

CCR 23, Chapter 15 Discharges of Hazardous Waste to Land Section 2511(b) pertains to water quality aspects of waste discharge to land. The regulation establishes waste and site classifications as well as waste management requirements for waste treatment, storage, or disposal in landfills, surface impoundments, waste piles, and land treatment facilities. Requirements are minimum

standards for proper management of each waste category, which allows regional water boards to impose more stringent requirements to accommodate regional and site-specific conditions. In addition, the requirements of CCR 23, Chapter 15 applies to cleanup and abatement actions for unregulated hazardous waste discharges to land (e.g., spills).

Environmental Setting

The assessment of potential to encounter hazardous materials in soil and groundwater in the city is generally based on a search of federal, State, and local regulatory databases that identify permitted hazardous materials uses, environmental cases, and spill sites. The Department of Toxic Substances Control (DTSC) EnviroStor database contains information on properties in California where hazardous substances have been released or where the potential for a release exists. The California State Water Resources Control Board (SWRCB) GeoTracker database contains information on properties in California for sites that require cleanup, such as LUST sites, which may impact, or have potential impacts, to water quality, with emphasis on groundwater.

According to databases of hazardous material sites maintained by the DTSC (EnviroStor) and the SWRCB (GeoTracker), Los Altos has five active cleanup sites and one active school cleanup site (DTSC 2021; SWRCB 2021). As shown in Figure 9, these sites are mostly located along Foothill Expressway.

Impact Analysis

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

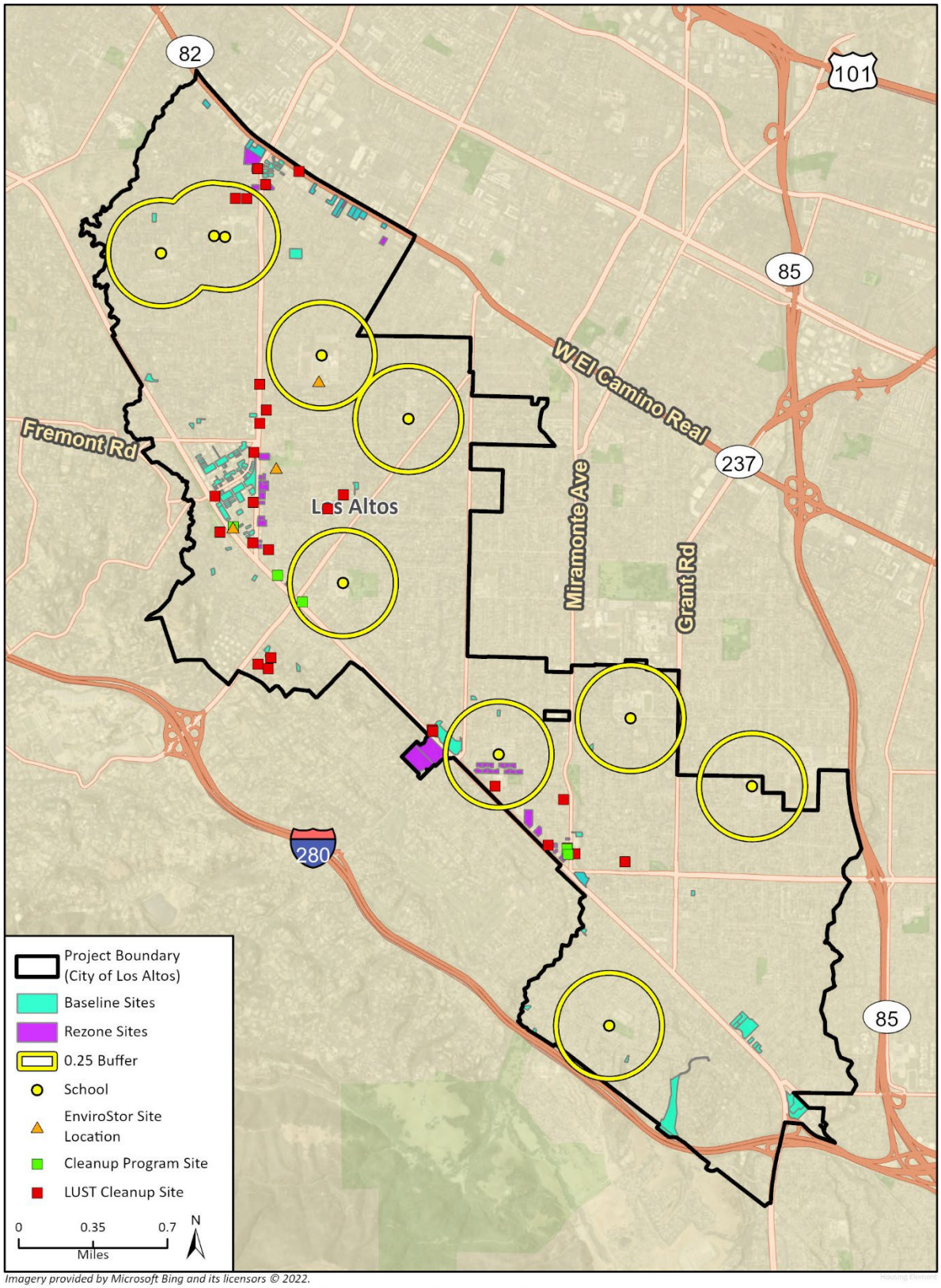
Construction Activities

Construction associated with future development under the proposed HEU may include the temporary transport, storage, and use of potentially hazardous materials including fuels, lubricating fluids, cleaners, or solvents. If spilled, these substances could pose a risk to the environment and to human health. However, the transport, storage, use, or disposal of hazardous materials is subject to various federal, State, and local regulations designed to reduce risks associated with hazardous materials, including potential risks associated with upset or accident conditions. Specifically, as discussed under Regulatory Setting, DOT regulations would regulate the transportation process of hazardous materials and reduce the risk of accidental release into the environment.

Compliance with existing regulations would reduce the risk of potential release of hazardous materials during construction.

In addition, grading or excavation on sites with existing contamination may result in the transport and disposal of hazardous materials if they are unearthed and removed from the site. Potential health and environmental concerns related to contaminated groundwater and soil may occur during excavation and dewatering for new construction. However, future development under the project would be subject to regulatory programs such as those listed in the Regulatory Setting and overseen by the RWQCB and the DTSC.

Figure 9 Known Hazardous Sites and Hazardous Sites Located Within 0.25 Mile of a School



Imagery provided by Microsoft Bing and its licensors © 2022.
Additional data provided by Geotracker, 2022; EnviroStor, California School Campus Database (CSCD) 2022.

These agencies require applicants for development of potentially contaminated properties to perform investigation and cleanup if the properties are contaminated with hazardous substances. The removal, transport, storage, use, or disposal of hazardous materials would be subject to federal, state, and local regulations pertaining to the transport, use, storage, and disposal of hazardous materials.

Los Altos contains numerous residential and commercial buildings that, due to their age, may contain asbestos and/or lead-based paint. Structures built before the 1970s typically contained asbestos containing materials. Demolition or redevelopment of these structures could result in health hazard impacts to workers if not remediated prior to construction activities. Future development would be required to adhere to BAAQMD Regulation 11, Rule 2, which governs the proper handling and disposal of asbestos containing materials for demolition, renovation, and manufacturing activities in the Bay Area, and California Occupational Safety and Health Administration (CalOSHA) regulations regarding lead-based materials. The California Code of Regulations, Section 1532.1, requires testing, monitoring, containment, and disposal of lead-based materials, such that exposure levels do not exceed CalOSHA standards. Therefore, with adherence to State and local regulations listed in the Regulatory Setting, risk of public exposure to hazardous materials would be greatly reduced, and impacts related to hazards and hazardous materials during construction would be less than significant.

Operation

The proposed HEU is intended to expand housing capacity and would not facilitate the establishment of uses that would sell, use, store, transport, or release substantial quantities of hazardous materials such as industrial, warehouse, auto-service, or manufacturing uses. Residential uses do not typically use hazardous materials other than small amounts for cleaning and landscaping. These materials would not be different from household chemicals and solvents already in wide use throughout the Los Altos. Residents are anticipated to use limited quantities of products routinely for periodic cleaning, repair, and maintenance or for landscape maintenance/pest control that could contain hazardous materials. Those using such products would be required to comply with all applicable regulations regarding the disposal of household waste. Therefore, operation of new residential uses poses little risk of exposing the public to hazardous materials, and impacts would be less than significant.

CEQA is concerned with the impacts of a project on the environment, and not the impacts of the environment on a project. However, for informational purposes, the effects of the location of new housing units is analyzed. Although the project would place new housing units in areas near major transportation corridors where hazardous materials may be transported, the DOT's Office of Hazardous Materials Safety regulates the transportation of hazardous materials, as described in Title 49 of the CFR, and implemented by Title 13 of the CCR, would reduce the chances of hazardous release during transport. Additionally, all new development that uses hazardous materials would be required to comply with the regulations, standards, and guidelines established by the USEPA, the State, and the City of Los Altos related to storage, use, and disposal of hazardous materials. Goal 3 and Policies 3.1 and 3.2 of the Natural Environment and Hazards Element of the Los Altos General Plan also aim to regulate the use, storage, transport, and disposal of hazardous materials. Therefore, with adherence to State and local regulations, impacts related to hazards and hazardous materials during operation would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project 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?

As discussed under checklist question (a) above, grading or excavation on sites with existing contamination may result in the transport, disposal, and release of hazardous materials if they are unearthed and removed from the site. However, future development under the project would be subject to regulatory programs such as those overseen by the RWQCB and the DTSC. These agencies require applicants for development of potentially contaminated properties to perform investigation and cleanup if the properties are contaminated with hazardous substances. Additionally, future development would be required to comply with Chapter 6.15 of the LAMC which requires building demolition permit applicants to conduct a screening assessment of polychlorinated biphenyls in priority building materials to reduce the risk of release into the environment. Therefore, impacts would be less than significant.

Residential uses do not typically use hazardous materials other than small amounts for cleaning and landscaping. These materials would not be different from household chemicals and solvents already in wide use throughout Los Altos. Residents and workers are anticipated to use limited quantities of products routinely for periodic cleaning, repair, and maintenance or for landscape maintenance/pest control that could contain hazardous materials. Those using such products would be required to comply with all applicable regulations regarding the disposal of household waste. Therefore, operation of new residential uses poses little risk of exposing the public to hazardous materials. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Several housing sites are located within a 0.25 mile of an existing school, such as Montclaire Elementary School; Loyola Elementary School; Santa Rita Elementary School; and Bullis Charter School, North Campus. The proposed HEU would not involve new industrial or manufacturing uses, or involve the use, storage, disposal, or transportation of significant quantities of hazardous materials. They may involve use and storage of some materials considered hazardous, though primarily these would be limited to solvents, paints, chemicals used for cleaning and building maintenance, and landscaping supplies. These materials would not be different from household chemicals and solvents already in general and wide use throughout the city. Development accommodated under the project therefore would not pose as a health risk to nearby schools or childcare facilities.

Additionally, as mentioned above under impacts a and b, construction activities associated with future development may include the temporary transport, storage, and use of potentially hazardous materials including fuels, lubricating fluids, cleaners, or solvents. Specifically, demolition of existing buildings and grading and excavation activities associated with new construction may result in emissions and transport of hazardous materials within one-quarter mile of existing schools. As discussed under checklist question (d), two housing inventory sites overlap cleanup sites. One of these sites is within 0.25 mile of a school. Therefore, grading or excavation on a site included on a list of hazardous materials sites may expose contamination within proximity of a school. However, adherence to applicable requirements, including DOT and DTSC regulations, as well as implementation of mitigation measures HAZ-1, HAZ-2, and HAZ-3 below would reduce impacts to less than significant levels. Mitigation Measure HAZ-1 would require regulatory database review

and/or investigation, and HAZ-2 requires preparation of a Soil Management Plan (SMP) if impacted soils or wastes are discovered at a project site, which would require the establishment of remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. Mitigation Measure HAZ-3 would require conduction of additional analytical testing and recommendation of soil disposal methods or other remedial engineering controls in order to reduce impacts from hazardous soils and wastes. Compliance with existing applicable regulations and policies and mitigation measures would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials. Oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these substances. Overall, impacts related to release of hazardous materials within 0.25 mile of an existing or proposed school would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. Would the project be located on a site that is included on a list of hazardous material 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?

As shown in Figure 9, above, there are five active cleanup sites in Los Altos, three of which are located within or adjacent to housing inventory sites. There are also closed LUST cleanup sites and EnviroStor sites that are located in proximity to housing sites. One housing inventory site (APN 18956014) would overlap two closed LUST cleanup sites and one housing inventory site (APN 16741007) would overlap an active cleanup site (Los Altos Cleaners). Development facilitated by the proposed HEU may involve ground disturbance on sites where soil, soil vapor, or groundwater contamination is present such that hazardous materials are released. This could expose construction workforce and or nearby occupants to hazardous materials, and impacts could potentially be significant. Implementation of mitigation measures HAZ-1, HAZ-2, and HAZ-3 would be required. Mitigation Measure HAZ-1 would require regulatory database review and/or investigation, and HAZ-2 would require preparation of a SMP if impacted soils or wastes are discovered at a project site, which would require the establishment of remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. Mitigation measure HAZ-3 would require conduction of additional analytical testing and recommendation of soil disposal methods or other remedial engineering controls in order to reduce impacts from hazardous soils and wastes.

Mitigation Measures

The following mitigation measures are required prior to development on sites listed on a hazardous materials database or where contamination may be present:

HAZ-1 Database Review and Investigation

The City shall establish the following Standard Condition of Approval for projects requiring approval:

> *Prior to issuance of a grading permit, the SWRCB's GeoTracker database and DTSC's EnviroStor database shall be consulted by City staff or consultant to determine whether or not the site to be graded is within 500 feet of an identified active hazardous material site.*

If the site is identified in the GeoTracker or EnviroStor databases within 500 feet of an identified active hazardous material site, or if the site to be graded is located on a site that:

- *Was currently and/or historically used for railroad, agricultural, or industrial uses.*
- *Was previously or is currently utilized to store, handle, and/or generate hazardous materials.*
- *Has unknown previous site uses; and/or*
- *Was previously or is currently utilized as a manufacturing facility, a gasoline station, automobile repair shop (or similar), or dry cleaner,*

The following process shall be followed prior to issuance of a grading permit:

- *The project applicant shall retain a qualified environmental professional (Professional Geologist or Professional Civil Engineer) to prepare a Phase I ESA in accordance with current ASTM standards.*
- *If the Phase I ESA identifies any potential contamination sources, the project applicant shall retain a qualified environmental consultant to prepare a Phase II ESA (subsurface investigation) to determine whether the identified potential sources have resulted in soil, groundwater, or soil vapor contamination exceeding regulatory action levels.*
- *If the Phase II ESA identifies contamination exceeding applicable regulatory screening levels for construction workers and future site users published by the Regional Water Quality Control Board (RWQCB), Department of Toxic Substances Control (DTSC), and/or Environmental Protection Agency (EPA), a Soil Management Plan shall be prepared (see HAZ-2).*
- *If the Phase II ESA identifies contamination exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), remediation shall be conducted (see HAZ-3).*

The project applicant shall provide written evidence of regulatory database review and investigation. The City of Los Altos shall ensure that evidence of regulatory database review and investigation has been provided by the project applicant prior to project approval.

HAZ-2 Soil Management Plan for Impacted Soils

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

If impacted soils or other impacted wastes are present at the project site, the project applicant shall retain a qualified environmental professional to prepare a Soil Management Plan (SMP) prior to construction. The SMP, or equivalent document, shall be prepared to address onsite handling and management of impacted soils or other impacted wastes and reduce hazards to construction workers and offsite receptors during construction. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. These measures and practices may include, but are not limited to:

- *Stockpile management including stormwater pollution prevention and the installation of BMPs*
- *Guidance regarding proper disposal procedures of contaminated materials*
- *Guidance regarding monitoring, reporting, and regulatory agency notification*

- *A health and safety plan (HASP) for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection*
- *The HASP shall also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.*

The project applicant shall prepare and implement a written Soil Management Plan and ensure that an appropriate regulatory oversight agency, such as Santa Clara County Department of Environmental Health, reviews and approves the development site Soil Management Plan, HASP, and remedial measures for impacted soils.

The City of Los Altos shall ensure that a written Soil Management Plan, HASP, and remedial measures for impacted soils has been prepared and approved prior to issuance of a grading permit.

HAZ-3 Remediation

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

If soil present within the construction envelope at the development site contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project applicant shall retain a qualified environmental consultant (PG or PE), to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary.

The qualified environmental consultant shall use the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted wastes. The qualified environmental consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate.

The project applicant or their contractors shall provide evidence that remediation reduced contaminant levels to below applicable federal, State, and local regulations for human and environmental health, and below hazardous materials threshold concentrations. Evidence of compliance may include, but is not limited to, notifying the appropriate oversight agency (e.g., SCCDEH) of the contamination, hiring a qualified environmental professional to conduct the necessary assessments and abatement (including soil sampling, preparing a remediation plan to adequately abate the hazardous materials, and ultimately obtaining necessary clearance letters from the oversight agency), and issuance of a No Further Action letter, if applicable.

City of Los Altos shall ensure that evidence of remediation compliance has been provided by the project applicant, prior to issuing an occupancy permit.

Significance After Mitigation

Development of identified hazard sites would be preceded by investigation, remediation and cleanup under the supervision of the RWQCB or DTSC before construction activities could begin as currently required by federal, State, and local regulations. The agency responsible for oversight

would determine the types of remediation and cleanup required and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells onsite with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants. Compliance with federal, State, and local regulations would apply to development. Mitigation Measure HAZ-1 would address the onsite handling and management of impacted soils or other impacted wastes and would reduce hazards to construction workers and offsite receptors during construction. Where remediation of onsite soils or other impacted wastes is necessary, implementation of mitigation measure HAZ-2 would address the offsite removal and proper disposal of impacted soils or other impacted wastes. Therefore, implementation of mitigation measures HAZ-1 and HAZ-2 would identify, manage onsite, and/or remove hazardous material impacted soils prior to construction (demolition and grading) and would reduce exposure to hazards resulting from development of a potential hazardous materials site to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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?

There are no public or private airports within Los Altos. The nearest airport is the San Jose International Airport which is located 7 miles east of the City limits. The project would have no impact related to a safety hazard or excessive noise hazards within airport land use plan areas or in proximity to airports. There would be no impact.

NO IMPACT

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City has adopted its Emergency Preparedness Plan (Los Altos PREPARES) implemented by the local police and fire departments, in conjunction with the Santa Clara County Office of Emergency Services. Los Altos PREPARES provides guidance for City response to emergency situations such as natural disasters and other large-scale incidents. Construction of housing development facilitated by the proposed HEU could interfere with implementation of the Los Altos PREPARES during a disaster event, as construction may involve lane closures. However, lane closures would be coordinated with the City prior to permit issuance, and land closures would be temporary. Therefore, the plan would not substantially impair an adopted emergency response or evacuation plan, and impacts would be less than significant.

The City has also identified primary North/South evacuation routes at Arastradero Road, West Fremont Road, San Antonio Road, South El Monte Avenue, Magdalena Avenue, South Springer Road, and Grant Road; and primary East/West evacuation routes at Foothill Expressway, El Camino Real, Cuesta Drive, Fremont Avenue, Interstate 280, and Highway 101 (City of Los Altos 2022b). Many of the housing sites are located along access and evacuation routes including North San Antonio Road, Springer Street, and Foothill Expressway. While traffic increases associated with the proposed project may affect streets within the city, North San Antonio Road, Springer Street, and Foothill Expressway would still serve as evacuation routes in case of emergency.

Additionally, Policy 5.3 of the Los Altos General Plan Natural Environment and Hazards Element aims to encourage key emergency personnel to live within the community by allowing development of mixed-use housing in the Downtown area and along El Camino Real, Foothill Plaza, and other appropriate commercial districts. The proposed HEU would facilitate development in the Downtown Land Use Plan Area and the Sherwood Gateway Specific Plan Area, providing more housing opportunities for emergency personnel and further reducing impacts to hazards and emergency response. Therefore, development facilitated by implementation of the proposed HEU would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Wildfire impacts are discussed in detail under Section 20, *Wildfire*. As discussed therein, the proposed HEU would result in less than significant impacts related to wildfire.

LESS THAN SIGNIFICANT IMPACT

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	■	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	■	☐
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;	☐	■	☐	☐
(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?	☐	■	☐	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	■
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	■	☐

Environmental Setting

Los Altos is under the jurisdiction of the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB), which is responsible for the preparation and implementation of the water quality control plan, also known as the Basin Plan, for the region. Four creeks are located within the City of Los Altos, including Adobe Creek, Stevens Creek, Permanente Creek, and Hale Creek as shown on Figure 5.

California Water Service Company (Cal Water) is the primary water provider within Los Altos Limits. Los Altos is located in Cal Water's Los Altos Suburban District. The Los Altos Suburban District sources water supply through a combination of groundwater from the Santa Clara Subbasin, recycled water, and purchased water from the Santa Clara Valley Water District (Cal Water 2021).

Regulatory Setting

Santa Clara Valley Water District

The Santa Clara Valley Water District (Valley Water) operates as the flood control agency for Santa Clara County. They manage creek restoration, pollution prevention efforts, and groundwater recharge. Permits for well construction and destruction work, most exploratory boring for groundwater exploration, and projects within Valley Water property or easements are required under Valley Water's Water Resources Protection Ordinance and District Well Ordinance.

Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Construction Impacts

Construction activities associated with development facilitated under the proposed HEU would have the potential to cause soil erosion from exposed soil, and accidental release of hazardous materials used for equipment such as vehicle fuels and lubricant, or temporary siltation from storm water runoff. Soil disturbance would occur during excavation for proposed building foundations, demolition of existing buildings, and grading for improvements to public spaces and landscaped areas or development projects. However, future development facilitated by the proposed project would be required to comply with State and local water quality regulations designed to control erosion and protect water quality during construction. This includes compliance with the requirements of the SWRCB Construction General Permit and LAMC Section 10.08.430, which requires preparation and implementation of a SWPPP for projects that disturb one acre or more of land. The SWPPP must include erosion and sediment control BMPs that would meet or exceed measures required by the Construction General Permit, as well as those that control hydrocarbons, trash, debris, and other potential construction-related pollutants. Construction BMPs would include scheduling inlet protection, silt fencing, fiber rolls, stabilized construction entrances, stockpile management, solid waste management, and concrete waste management. Post-construction stormwater performance standards are also required to specifically address water quality and channel protection events. Implementation of these BMPs would prevent or minimize environmental impacts and ensure that discharges during the construction phase of new development facilitated by the proposed project would not cause or contribute to the degradation of water quality in receiving waters.

Should dewatering be necessary during construction, it may result in the discharge of potentially contaminated groundwater to surface water and may degrade the water quality of surrounding watercourses and waterbodies. However, future development projects would be subject to the San Francisco Bay Regional Water Quality Control Board Order No. R2-2012-0060, General Waste Discharge Requirements for Discharge or Reuse of Extracted Brackish Groundwater, Reverse Osmosis Concentrate Resulting from Treated Brackish Groundwater, and Extracted Groundwater from Structural Dewatering Requiring Treatment (Groundwater General Permit). The Groundwater General Permit requires dischargers to obtain an Authorization to Discharge, treat effluent to meet water quality-based effluent limitations, and comply with the Monitoring and Reporting Program. Pumped groundwater must be tested and if determined to be contaminated, the water must be collected and either treated or disposed of according to waste discharge requirements of Order No. R2-2012-0060. Future applicants are required to comply with all requirements of the Groundwater General Permit. Additionally, future development would be required to adhere to stormwater requirements for construction operations pursuant to LAMC Section 10.08.430. Therefore, construction-related water quality impacts would be less than significant.

Operational Impacts

Los Altos is urbanized, and the majority of housing sites are almost entirely covered with impervious surfaces except for landscaped areas. Development under the proposed HEU would involve infill and redevelopment of existing sites. Future development would be required to be implemented in compliance with existing programs and permits, including the LAMC, the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP), and the Municipal Regional Stormwater NPDES Permit (No. CAS612008). Development design would include BMPs to avoid adverse effects associated with stormwater runoff quality. Specifically, future development facilitated by the proposed project would be required to implement LID Measures and on-site infiltration, as required under the C.3 provisions of the Municipal Regional Stormwater Permit (MRP) and SCVURPPP (SCVURPPP 2016). Implementation of LID measures would reduce water pollution from stormwater runoff as compared to existing conditions. For example, on-site infiltration would improve the water quality of stormwater prior to infiltration or discharge from the site.

The City of Los Altos is responsible for enforcing the requirements of the MRP. Compliance with the MRP must include operational and maintenance control measures, or BMPs and construction-related BMPs. Provisions specified in the MRP that affect construction projects generally include but are not limited to Provision C.3 (New Development and Redevelopment), Provision C.6 (Construction Site Control), and Provision C.15 (Exempted and Conditionally Exempted Discharges). Provision C.3 of the MRP addresses post-construction stormwater requirements for new development and redevelopment projects that add and/or replace 10,000 square feet or more of impervious area or special land use categories that create and/or replace 5,000 square feet of impervious surfaces, such as auto service facilities, retail gas stations, restaurants, and uncovered parking lots. These “regulated” projects are required to meet certain criteria: 1) incorporate site design, source control, and stormwater treatment measures into the project design; 2) minimize the discharge of pollutants in stormwater runoff and non-stormwater discharge; and 3) minimize increases in runoff flows as compared to pre-development conditions. Additionally, future development would be required to comply with Chapter 10.16 of the LAMC which outlines the requirements for permanent stormwater pollution prevention measures, hydromodification management measures, and site design measures.

Compliance with the MRP and LAMC would increase infiltration of stormwater, decrease stormwater runoff, and would reduce the risk of water contamination from operation of new developments to the maximum extent practicable, and the project would reduce water pollution from stormwater runoff as compared to existing conditions. Therefore, the proposed project would not violate water quality standards or waste discharge requirements, would not significantly contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and would not substantially degrade water quality. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Cal Water supplies water to the Los Altos, and its 2020 Los Altos Suburban District Urban Water Management Plan (UWMP) anticipates future growth in the city through 2045. The Los Altos Suburban District currently pumps groundwater from the Santa Clara Subbasin (DWR Basin No.2-009.02) of the Santa Clara Valley Basin. The Santa Clara Subbasin is not considered by DWR to be critically over drafted; however, the Santa Clara Subbasin has been prioritized by DWR as "high" priority. Cal Water coordinates with the Valley Water Groundwater Sustainability Agency (GSA), which manages the Santa Clara Subbasin, to protect and maintain the sustainability of the Basin. The GSA completed an Alternative Groundwater Sustainability Plan in December 2016 per the Sustainable Groundwater Management Act. According to the UWMP, available groundwater supplies are expected to be sufficient to meet the projected future demands of the Los Altos Suburban District in normal and multiple dry year periods through 2045.

Development facilitated by the proposed HEU may increase the amount of impervious surfaces on individual development sites throughout Los Altos which may incrementally affect groundwater recharge on these sites. However, future projects would not include installation of new groundwater wells or use groundwater from existing wells. As discussed under checklist question (a) above, development would be required to comply with Provision C.3 requirements of the MRP as well as Chapter 10.16 of the LAMC, which outlines the requirements for permanent stormwater pollution prevention measures, hydromodification management measures, and site design measures. Compliance with the MRP and LAMC would increase absorption of stormwater runoff and the potential for groundwater recharge. Water that does not recharge into the groundwater would be released into the City's existing storm drain system.

Los Altos is under the jurisdiction of the SFBRWQCB, which is responsible for preparing the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan designates beneficial uses of water in the region and establishes narrative and numerical water quality objectives. The Basin Plan serves as the basis for the SFBRWQCB's regulatory programs and incorporates an implementation plan for achieving water quality objectives. With adherence to the State and local water quality standards discussed above, the project would not have an adverse effect on water quality and would not interfere with the objectives and goals in the Basin Plan.

Therefore, development under the proposed HEU would not result in a net deficit in aquifer volume or a lowering of the groundwater table and would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c.(i) Would the project 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 result in substantial erosion or siltation on- or off-site?

Construction

Construction activities would involve stockpiling, grading, excavation, paving, and other earth-disturbing activities, which may result in the alteration of existing drainage patterns. As described under checklist question (a) above, compliance with the NPDES Construction General Permit, NPDES MS4 General Permit, and the LAMC would reduce risk of short-term erosion and increased runoff resulting from drainage alterations during construction. Therefore, construction related impacts would be less than significant.

Operation

As discussed in Section 4, *Biological Resources,* several inventory sites are located on or adjacent to creeks. Future development would be required to comply with Chapter 6.32 of the LAMC, which outlines watercourse protection regulations and prohibits modification and pollution of the creeks. Section 6.32.030 prohibits residents of properties through which a watercourse passes from polluting the specific part of the watercourse and prohibits residents from removing healthy vegetation on or adjacent to the watercourse bank, and Section 6.32.040 outlines setback requirements along Adobe Creek. Additionally, Chapter 10.16 of the LAMC details requirements for stormwater pollution prevention measures which would reduce stormwater runoff from polluting the creeks. This would reduce the potential for modifications to the waterways that would prohibit wildlife movement or affect riparian habitat or sensitive species. Additionally, housing sites near creeks and streams would be subject to the Santa Clara Valley Water Resources Protection Collaborative's (Water Collaborative) Guidelines and Standards for Land Use Near Streams manual during the City's development review process (Water Collaborative 2007), which are designed to protect creeks and riparian habitats. Nonetheless, mitigation measures BIO-4 and BIO-5 are requires to prevent impacts to creeks.

Development could potentially alter the exiting drainage patterns at the future development sites through the introduction of new impervious surfaces and infrastructure. However, the future development sites and vicinities are generally urbanized and future development would be required to implement stormwater pollution prevention measures which would reduce erosion and stormwater pollutants. The introduction of impervious surfaces on these sites would not substantially affect the drainage patterns of the area or stormwater runoff volumes due to the relatively minor change in impervious surface area in the larger context. Although site-specific drainage pattern alterations could occur with development facilitated by the proposed project, such alterations would not result in substantial adverse effects. The inventory sites are mostly covered with impervious surfaces, and development under the proposed project would not introduce new impervious areas to the extent that the rate or amount of surface runoff would substantially increase. Development that could be facilitated by the proposed project would not introduce substantial new surface water discharges and would not result in flooding on- or off-site. Overall drainage patterns, including direction of flow and conveyance to stormwater infrastructure, would not be modified by the project, and the runoff volume and rate from the project would be reduced compared to existing conditions. Furthermore, MRP-regulated projects would be required must treat 80 percent or more of the volume of annual runoff for volume-based treatment measures. Projects that create or replace 2,500 square feet or more, but less than 10,000 square feet, of

impervious surface must implement site design measures to reduce stormwater runoff. All future development that satisfies Provision C.3 of the SCVURPPP would be required to implement post-construction stormwater controls into the design of the project. Compliance with State and local regulations as well as the LAMC would increase infiltration of stormwater and reduce stormwater runoff from operation of new developments to the extent practicable. Additionally, future development facilitated under the proposed HEU would be required to comply with Policy 3.3 of the Infrastructure and Waste Disposal Element of the Los Altos General Plan, which aims to minimize the amount of impervious surfaces in areas of new development and maximize on-site infiltration of stormwater runoff.

Therefore, with compliance with existing regulations and implementation of mitigation measures BIO-4 and BIO-5, development that could be facilitated by the proposed HEU would not substantially alter the existing drainage pattern of the site or area or alter the course of any stream or river in a manner that would substantially increase the rate or amount of surface runoff in a manner which would result in substantial erosion or siltation on- or off-site. This impact would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c.(ii) Would the project 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

For the same reasons outlined above under checklist question (c.i), with compliance with existing regulations and implementation of mitigation measures BIO-4 and BIO-5, development that could be facilitated by the proposed HEU would not substantially alter the existing drainage pattern of the site or area or alter the course of any stream or river in a manner which would result in flooding on- or off-site. This impact would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c.(iii) Would the project 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 that would 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?

For the same reasons outlined above under checklist question (c.i), with compliance with existing regulations and implementation of mitigation measures BIO-4 and BIO-5, development that could be facilitated by the proposed HEU would not substantially alter the existing drainage pattern of the site or area or alter the course of any stream or river in a manner which would create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. This impact would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c.(iv) Would the project 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 impede or redirect flood flows?

For the same reasons outlined above under checklist question (c.i), with compliance with existing regulations and implementation of mitigation measures BIO-4 and BIO-5, development that could be facilitated by the proposed HEU would not substantially alter the existing drainage pattern of the site or area or alter the course of any stream or river in a manner which would impede or redirect flood flows. This impact would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Los Altos does not contain large surface water bodies that would result in seiches and is not located in a tsunami zone (DOC 2022b). The Federal Emergency Management Agency (FEMA) establishes base flood elevations (BFE) for 100-year and 500-year flood zones and establishes Special Flood Hazard Areas (SFHA). SFHAs are those areas within 100-year flood zones or areas that will be inundated by a flood event having a one percent chance of being equaled or exceeded in any given year. The 500-year flood zone is defined as the area that could be inundated by the flood which has a 0.2 percent probability of occurring in any given year, or once in 500 years, and is not considered an SFHA. As shown in Figure 5, almost the entire City and all the housing sites under the proposed HEU are located in a 500-year flood zone, with the exception of two housing sites which are located in a 100-year flood zone on Permanente Creek. Development in flood zones is regulated through Chapter 12.60 of the LAMC, which outlines requirements for management of and development in flood hazard areas, such as obtaining permits for floodplain development, elevation requirements, and using flood damage-resistant materials for new construction. Therefore, development under the proposed HEU on these sites would be designed to withstand flooding hazards, including FEMA-designated Flood Hazard Areas. Additionally, the development facilitated by the proposed project would be required to adhere to existing federal, State, and local laws and regulations that address the management and control of pollutants, including regulations addressing the proper disposal, transportation, storage, and handling of potentially hazardous materials, including the California Health and Safety Code and Division 7 of the California Water Code. Adherence to existing regulations would reduce the risk of the release of pollutants. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As discussed under checklist question (b), Cal Water's Los Altos Suburban District currently pumps groundwater from the Santa Clara Subbasin (DWR Basin No.2-009.02) of the Santa Clara Valley Basin. Cal Water coordinates with the Valley Water Groundwater Sustainability Agency (GSA), which manages the Santa Clara Subbasin, to protect and maintain the sustainability of the Basin. The GSA completed an Alternative Groundwater Sustainability Plan in December 2016 and a Groundwater Management Plan (GWMP) for the Santa Clara and Llagas Subbasin in 2021 (Valley Water 2021) per the Sustainable Groundwater Management Act.

Los Altos is under the jurisdiction of the SFBRWQCB, which is responsible for preparing the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan designates beneficial uses of water in the region and establishes narrative and numerical water quality objectives. The Basin Plan serves as the basis for the SFBRWQCB's regulatory programs and incorporates an implementation plan for achieving water quality objectives.

As discussed under checklist question (b), future development would not include installation of new groundwater wells or use groundwater from existing wells. Additionally, with adherence to the State and local water quality standards such as Provision C.3 requirements of the MRP as well as Chapter 10.16 of the LAMC, development under the proposed HEU would not interfere with the objectives and goals in the GWMP or the Basin Plan. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

Agenda Item # 3.

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	■
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?	☐	☐	■	☐

a. Would the project physically divide an established community?

The proposed HEU would not divide a community; rather, it is designed to meet the City's RHNA and includes implementation programs that would promote the development of existing vacant, underdeveloped, or underutilized properties, as well as implement a rezoning program to increase allowed density and height, thereby locating people closer to existing employment, goods and services within an established community. The proposed HEU involves policies and programs that would increase the potential number of dwelling units in Los Altos and intensify development in existing urban areas. The proposed HEU does not involve the construction of barriers, such as new roads or other linear development or infrastructure, that would divide the existing communities or neighborhoods. Existing roadways would not be permanently blocked, and temporary construction would not limit access to a community or restrict movement within a community. No impact related to dividing an established community would occur.

NO IMPACT

b. Would the project 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 proposed HEU would provide a framework for introducing new housing at all levels of affordability that is within access to transit, jobs, services, and open spaces. Through its identification of sites for future development and implementation of housing programs, the project would encourage development of up to 1,648 new residential units, which would address the City's fair share housing needs as quantified in the RHNA.

The proposed HEU would also include zoning ordinance and zoning map amendments to increase permitted densities in the CN, CT, OA, and PCF districts and height in the CT district

The following analysis discusses the project's consistency with applicable policies in the Los Altos General Plan, presented in Table 16, and the LAMC.

City of Los Altos General Plan

As shown in Table 16, the project would be consistent with the goals, policies, and actions within the Los Altos General Plan. As noted under Government Code Section 65589.5(a), the Legislature has concluded that "the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California." More specifically, the Legislature's stated intent is "to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal" (Government Code Section 65581). The project would help meet the City's RHNA allocation, as well as efficiently utilize vacant, underutilized, and underdeveloped lots within Los Altos to increase the supply of housing. The project would encourage development of housing, which is supportive of the City's goal and policies.

Table 16 Project Consistency with Relevant General Plan Goals and Policies

General Plan Policy	Proposed HEU Project Consistency
Community Design and Historic Resources Element	
Policy 1.6: Continue to provide for site planning and architectural design review within the City, with a focus on mass, scale, character, and materials. **Policy 1.7:** Enhance neighborhood character by promoting architectural design of new homes, additions to existing homes, and residential developments that is compatible in the context of surrounding neighborhoods.	**Consistent.** Future development facilitated by the project would be subject to the City's existing general development standards (Title 14 of the LAMC, also known as the Zoning Code), to ensure that buildings are compatible with neighboring land uses, architectural design, and scale. Future development would also be required to undergo the City's design review process, where applicable, in order to ensure compatibility with surrounding property and use.
Downtown **Policy 3.3:** Encourage pedestrian and bicycle-oriented design in the Downtown.	**Consistent.** The proposed HEU would facilitate development within the City's Downtown Area in proximity to transit, which would encourage bicycling and walking to jobs and services. Development would be required to comply with the Downtown Design Guidelines, where applicable, as listed in Appendix II of the Downtown Land Use Plan.
Policy 3.3: Encourage the development of affordable housing above the ground floor throughout the Downtown.	**Consistent.** The proposed HEU would increase the number of market-rate and affordable housing within the city and in the Downtown Area. As discussed under Program 1.H of the proposed HEU, City-owned Downtown Parking Plazas 7 and 8 would be used to accommodate affordable housing.
El Camino Real Commercial Corridor **Policy 4.2:** Evaluate site development and design to ensure consistency in site design.	**Consistent.** Future individual projects located along the El Camino Real Commercial Corridor would be required to undergo the City's design review process, where applicable, in order to ensure compatibility with surrounding property and use.
Land Use Element	
Policy 2.2: Encourage a variety of residential housing opportunities by allowing residential uses with adequate parking in appropriate commercial areas, including sections of the Downtown area, Foothill Plaza and along El Camino Real.	**Consistent.** As shown in Figures 3 and 4 of the Project Description, the proposed HEU would facilitate development on undeveloped or underutilized sites and increase allowed density and height on housing sites located within or adjacent to the Downtown area, Foothill Plaza area, and El Camino Real Corridor.

General Plan Policy	Proposed HEU Project Consistency
Policy 2.3: Continue to conduct design review of residential and nonresidential development applications to ensure compatibility with surrounding property and neighborhoods.	**Consistent.** Future development facilitated by the project would be subject to the City's existing general development standards (Title 14 of the LAMC, also known as the Zoning Code), to ensure that buildings are compatible with neighboring land uses, architectural design, and scale. Future development would also be required to undergo the City's design review process, where applicable, in order to ensure compatibility with surrounding property and use.
Downtown **Policy 3.1:** Encourage residential development above the ground floor that includes affordable housing units.	**Consistent.** The proposed HEU would increase the number of market-rate and affordable housing within the Los Altos and in the Downtown. As discussed under Program 1.H of the proposed HEU, City-owned Downtown Parking Plazas 7 and 8 would be used to accommodate affordable housing.
Policy 3.5: Continue to review development plans to ensure compliance with the Downtown Urban Design Plan.	**Consistent.** Future development located within the Downtown area would be required to comply with design guidelines listed in the Downtown Urban Design Plan, where applicable. Additionally, projects in a non-single-family district may be subject to design review approval pursuant to Chapter 14.78 of the LAMC (City of Los Altos 2022c).
El Camino Real **Policy 4.3:** Encourage residential development on appropriate sites within the El Camino Real corridor. **Policy 4.4:** Encourage the development of affordable housing.	**Consistent.** The proposed HEU would increase the number of market-rate and affordable housing within the city and in the El Camino Real area. Program 1.B of the 2023-2031 Housing Element Update aims to facilitate higher density housing in the Commercial Thoroughfare (CT) Zone located along El Camino Real and Program 1.F aims to rezone the Village Court parcel at 4546 El Camino Real to CT.
Policy 4.6: Continue to review development proposals to ensure a balance between development rights and impact on surrounding residential neighborhoods.	**Consistent.** Future development located within or along the El Camino Corridor would be subject to the City's design review process, where applicable, in order to ensure compatibility with surrounding property and use.
Circulation Element	
Policy 2.4: Require development projects to mitigate their respective traffic and parking impacts by implementing practical and feasible street improvements. **Policy 2.5:** Ensure that new development or redevelopment projects provide adequate property dedication to accommodate future roadway improvements at key intersections and other problem areas. **Policy 2.6:** Implement and require developers to implement street improvements that accommodate and encourage the use of non-automobile travel modes including walking, bicycling, and transit.	**Consistent.** The proposed HEU would facilitate development within the Downtown Land Use Plan Area and the Sherwood Gateway Specific Plan Area, as well as along transportation corridors, which would encourage the use of non-automobile travel and encourage walking and bicycling. Future development would be required to mitigate their respective traffic and parking impacts and provide the appropriate dedication of property for future roadway improvements.

LAMC Consistency

As current zoning would not be able to deliver the level of deed-restricted affordable housing and economic and geographic diversity that the project aims to achieve, the proposed HEU would contain implementation programs and zoning policies to encourage additional housing, especially affordable housing that would support a diversity of income levels and household types. Additionally, under the proposed HEU, CN, CT, OA, and PCF districts are anticipated to increase in allowed density and CT district in height to facilitate increased development. All future development under the project would be required to comply with zoning requirements as described in Title 14, *Zoning*, of the LAMC.

Upon adoption of the proposed HEU and the associated zoning and General Plan amendments, the project would comply with the land use requirements set forth by the Los Altos General Plan and the LAMC, and therefore, would result in less than significant adverse physical land use impacts.

LESS THAN SIGNIFICANT IMPACT

12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
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?	☐	☐	☐	■

a. Would the project 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?

Los Altos does not have significant mineral resources or active mining sites within its boundaries. No mineral resources are identified in the City's General Plan (City of Los Altos 2002). The proposed HEU applies to an urban area which is not compatible with, identified for, or used for mineral extraction. Development under the proposed HEU would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state. Therefore, there would be no impacts related to mineral resources.

NO IMPACT

b. Would the project 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?

For the same reasons outlined above under checklist question (a), development under the proposed HEU would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan or other land use plan. Therefore, there would be no impacts related to mineral resources.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would 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?	☐	■	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	■	☐	☐
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 two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	■

Environmental Setting

Overview of Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

HUMAN PERCEPTION OF SOUND

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; dividing the energy in half would result in a 3 dB decrease (Caltrans 2013).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (half) as loud (10.5 times the sound energy) (Caltrans 2013).

SOUND PROPAGATION AND SHIELDING

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in the noise level as the distance from the source increases. The manner by which noise reduces with distance depends on factors such as the type of sources (e.g., point or line), the path the sound will travel, site conditions, and obstructions.

Sound levels are described as either a "sound power level" or a "sound pressure level," which are two distinct characteristics of sound. Both share the same unit of measurement, the dB. However, sound power (expressed as L_{pw}) is the energy converted into sound by the source. As sound energy travels through the air, it creates a sound wave that exerts pressure on receivers, such as an eardrum or microphone, which is the sound pressure level. Sound measurement instruments only measure sound pressure, and noise level limits are typically expressed as sound pressure levels.

Noise levels from a point source (e.g., construction, industrial machinery, air conditioning units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this "shielding" depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011). Structures can substantially reduce exposure to noise as well. The FHWA's guidance indicates that modern building construction generally provides an exterior-to-interior noise level reduction of 10 dBA with open windows and an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows (FHWA 2011).

NOISE DESCRIPTORS

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important factors of project noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. The noise descriptors used for this study are the equivalent noise level (L_{eq}), and the Day-Night Average Level (DNL; may also be symbolized as L_{dn}).

L_{eq} is one of the most frequently used noise metrics; it considers both duration and sound power level. The L_{eq} is defined as the single steady-state A-weighted sound level equal to the average sound energy over a period. When no period is specified, a 1-hour period is assumed. The L_{max} is the highest noise level within the sampling period, and the L_{min} is the lowest noise level within the measuring period. Normal conversational levels are in the 60 to 65-dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level (DNL or L_{dn}), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.).[12] The relationship between the peak-hour L_{eq} value and the L_{dn} depends on the distribution of noise during the day, evening, and night. Quiet suburban areas typically have L_{dn} noise levels in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 60+ dBA L_{dn} range (FTA 2018).

Overview of Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent buildings or structures and vibration energy may propagate through the buildings or structures. Vibration may be felt, may manifest as an audible low-frequency rumbling noise (referred to as groundborne noise), and may cause windows, items on shelves, and pictures on walls to rattle. Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants at vibration-sensitive land uses and may cause structural damage.

Typically, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. Vibration amplitudes are usually expressed in peak particle velocity (PPV) or root mean squared (RMS) vibration velocity. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used as it corresponds to the stresses that are experienced by buildings (Caltrans 2020).

High levels of groundborne vibration may cause damage to nearby building or structures; at lower levels, groundborne vibration may cause minor cosmetic (i.e., non-structural damage) such as cracks. These vibration levels are nearly exclusively associated with high impact activities such as blasting, pile-driving, vibratory compaction, demolition, drilling, or excavation. As shown in Table 17 and Table 18, the Caltrans *Transportation and Construction Vibration Guidance Manual* (2020) identifies guideline impact criteria for damage to buildings and additional impact criteria for annoyance to humans from transient and continuous/frequent sources.

[12] Because DNL is typically used to assess human exposure to noise, the use of A-weighted sound pressure level (dBA) is implicit. Therefore, when expressing noise levels in terms of DNL, the dBA unit is not included.

Table 17 Building Vibration Damage Potential

Structure and Condition	Maximum PPV (in./sec.)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient mountains	0.12	0.08
Fragile buildings	0.20	0.10
Historic and similar old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial/commercial buildings	2.00	0.50

Notes: Transient sources create a single isolated vibration event, such as blasting or drop balls (i.e., a loose steel ball that is dropped onto structures or rock to reduce them to a manageable size). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

PPV = peak particle velocity; in./sec. = inches per second

Source: Caltrans 2020

Table 18 Vibration Annoyance Potential

Human Response	Maximum PPV (in./sec.)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.90	0.10
Severe	2.00	0.40

Notes: Transient sources create a single isolated vibration event, such as blasting or drop balls (i.e., a loose steel ball that is dropped onto structures or rock to reduce them to a manageable size). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

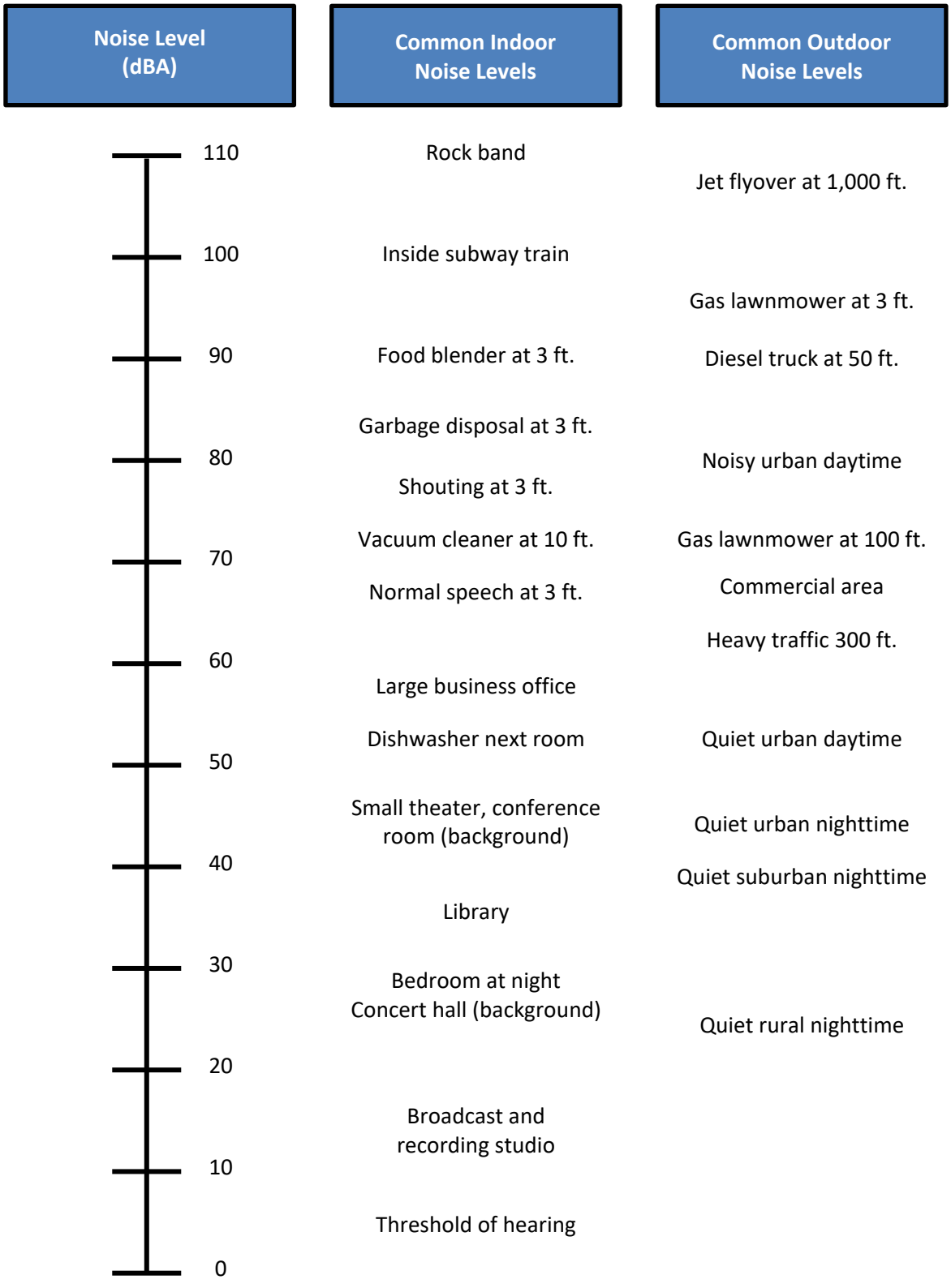
PPV = peak particle velocity; in./sec. = inches per second

Source: Caltrans 2020

Noise in Los Altos

Noise in Los Altos is primarily generated by vehicular traffic from cars and trucks. The greatest contributor to noise is traffic on I-280, El Camino Real, and Foothill Expressway. Other surface streets that experience significant increases in ambient noise levels include San Antonio Road, Fremont Avenue, Grant Road, and Springer Road. Land uses adjacent to these roadways in Los Altos are affected by motor vehicle-generated noise. Secondary sources of noise in Los Altos include construction, landscaping activities, and mechanical and stationary equipment. As shown in Figure 10, noisy urban areas or commercial areas (e.g., commercial districts with major arterial roadways and transit routes) can commonly reach noise levels between 60 dBA L_{eq} and 80 dBA L_{eq} during the daytime, whereas a common outdoor noise level associated with a quiet urban area (e.g., residential neighborhood with local or collector streets) is 50 dBA L_{eq} during the daytime. These noise levels typically decrease during nighttime hours as traffic activity slows, such that quiet urban areas commonly experience nighttime noise levels of 40 dBA L_{eq}.

Figure 10 Examples of Typical Noise Levels



Sensitive Receivers

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Noise-sensitive land uses are those that may be subject to stress and/or interference from excessive noise. Noise-sensitive land uses include residential uses, schools and daycare facilities, hospitals, and institutional uses such as places of worship and museums. Vibration sensitive receivers are similar to noise-sensitive receivers and also include historical, fragile buildings.

Potential sensitive receivers that may be impacted by development facilitated by the proposed HEU would primarily be residential uses and schools. Residential uses would mainly include single- or multi-family residences near or adjacent to housing inventory sites, and schools would include the Almond Elementary School, Covington Elementary School, Gardner Bullis School, Loyola Elementary School, Oak Avenue School, Santa Rita Elementary School, Springer Elementary School, Blach Intermediate School, and Egan Junior High School.

Regulatory Setting

City of Los Altos General Plan

The Natural Environment & Hazards Element of the City of Los Altos' General Plan contains Noise and Land Use Compatibility Standards policies that are applicable to the project. Residential land uses are considered “normally acceptable” when sites are exposed to noise levels below 60 dBA L_{dn}, “conditionally acceptable” when exposed to noise levels between 60 and 70 dBA L_{dn}, “normally unacceptable" when exposed to noise levels of between 70 and 75 dBA L_{dn} and “clearly unacceptable” when exposed to noise levels above 75 dBA L_{dn}.

City of Los Altos Municipal Code

The City’s Noise Control Ordinance was adopted to control unnecessary, excessive, and annoying noise and vibration within Los Altos. Specifically, Chapter 6.16.50 of the Los Altos Municipal Code establishes exterior noise limits for various zoning districts, as shown in Table 19. The City also has interior noise standards for multi-family residential dwellings at 45 dBA from 7 a.m. to 10 p.m. and 35 dBA from 10 p.m. to 7 a.m.

Table 19 City of Los Altos Municipal Code Exterior Noise Limits by Zone

Zone	Time	Exterior Noise Limit (dBA) (levels not to be exceeded more than 30 minutes every hour)
All R1 Zoning Districts	10 PM to 7 AM 7 AM to 10 PM	45 55
All R3 and PCF Zoning Districts	10 PM to 7 AM 7 AM to 10 PM	50 55
All OA Zoning Districts	10 PM to 7 AM 7 AM to 10 PM	55 60
All C Zoning Districts	10 PM to 7 AM 7 AM to 10 PM	60 65

Source: LAMC Section 6.16.050

The LAMC prohibits the production of noise on one property that would (i) exceed the noise standard on any other property for a cumulative period of more than thirty minutes in any hour; (ii) exceed the noise standard plus five dB on any other property for a cumulative period of more than fifteen minutes in any hour; (iii) exceed the noise standard plus 10 dB on any other property for a cumulative period of more than five minutes in any hour; (iv) exceed the noise standard plus 15 dB on any other property for a cumulative period of more than one minute in any hour; or (vi) exceed the noise standard plus 20 dB or the maximum measured ambient on any other property for any period of time. The LAMC also states that if the measured ambient level exceeds the maximum permissible noise level within any of the first four noise limit categories, the allowable noise exposure standard shall be increased in five dB increments in each category as appropriate to encompass or reflect such ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level. If the noise measurement occurs on a property adjacent to a zone boundary, the noise level limit applicable to the lower noise zone, plus five dB is the applicable noise limit.

To ensure that unnecessary or excessive noise disturbances from specific activities and equipment are avoided, the Noise Control Ordinance sets noise thresholds for musical instruments, loudspeakers, loading and unloading, construction and demolition, and air-conditioning equipment (LAMC Section 6.16.070). Exceeding those thresholds is considered a prohibited act and would constitute a violation of the Ordinance.

LAMC Section 6.16.070 establishes allowable hours of construction within residentially zoned properties. In these areas, construction is permitted between 7:00 a.m. and 5:30 p.m. Monday through Friday and between 9:00 a.m. and 3:00 p.m. on Saturdays. Construction in all other zoning districts (excluding single-family districts) is permissible between 7:00 a.m. and 7:00 p.m. Monday through Friday and 9:00 a.m. and 6:00 p.m. on Saturdays. Construction activities are not permitted on Sundays or the City observed holidays of New Year's Day, Memorial Day, Independence Day, Labor Day, Veterans' Day, Thanksgiving Day and Christmas Day.

In addition, according to LAMC Section 6.16.070(6)(b), where technically and economically feasible, maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment should not exceed those levels listed in Table 20 and maximum noise levels for the respectively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment should not exceed noise levels listed in Table 21.

Table 20 City of Los Altos Maximum Mobile Equipment Noise Levels

	All R1 Zoning Districts (dBA)	All PCF and R3 Zoning Districts (dBA)	All OA and C Zoning Districts (dBA)
Daily, except Sundays and legal holidays 7:00 a.m. — 7:00 p.m.	75	80	85
Daily, 7:00 p.m. — 7:00 a.m. and all day Sundays and legal holidays	50	55	60

Source: Table 3 in LAMC Chapter 6.16.070

Table 21 City of Los Altos Maximum Stationary Equipment Noise Levels

	All R1 Zoning Districts (dBA)	All PCF and R3 Zoning Districts (dBA)	All OA and C Zoning Districts (dBA)
Daily, except Sundays and legal holidays 7:00 a.m. — 7:00 p.m.	75	80	85
Daily, 7:00 p.m. — 7:00 a.m. and all day Sundays and legal holidays	50	55	60

Source: Table 4 in LAMC Chapter 6.16.070

Impact Analysis

a. Would the project result in 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?

Construction Noise

Future construction activity would require the use of a variety of noise-generating equipment that would result in temporary increases in ambient noise levels on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receiver, and presence or absence of noise attenuation barriers. Typical noise levels at 50 feet from various types of equipment that may be used during construction are listed in Table 22. The loudest noise levels are typically generated by impact equipment (e.g., pile drivers) and heavy-duty equipment (e.g., cranes, scrapers, and graders). Construction noise would occur intermittently throughout construction, and in some instances, multiple pieces of equipment may operate simultaneously, generating overall noise levels that are incrementally higher than what is shown in Table 22.

Table 22 Construction Equipment Noise Levels

Equipment	Typical Noise Level (dBA) at 50 Feet from Source
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Derrick	88
Crane, Mobile	83
Dozer	85
Generator	82
Grader	85
Jackhammer	88
Loader	80
Paver	85
Pile-driver (Impact)	101
Pile-driver (Sonic)	95
Pneumatic Tool	85
Pump	77
Roller	85
Saw	76
Scarifier	83
Scraper	85
Shovel	82
Truck	84

Source: FTA 2018

Sensitive receivers are located throughout Los Altos and could be exposed to noise associated with construction activities from reasonably foreseeable development under the proposed Housing Element Update. As discussed in the Environmental Setting, sensitive receivers in Los Altos mainly consist of residences and schools. Based on the location of sites shown on Figures 3 and 4 of the Project Description, this analysis assumes that construction activities for most projects under the proposed HEU would occur within 50 feet of sensitive receivers. As shown in Table 22, sensitive receivers would be exposed to noise levels ranging from 76 to 88 dBA at 50 feet from typical construction equipment and could reach as high as 101 dBA through the use of pile drivers.

However, a typical construction day includes the operation of multiple pieces of equipment at once with noise levels averaged over the construction day. For assessment purposes, a construction noise level at 50 feet from the source was estimated using RCNM and was based on an excavator, dozer, and jackhammer operating simultaneously. In addition, a separate scenario was also analyzed with these pieces of equipment and an impact pile driver. These pieces of equipment generate some of the highest noise levels during demolition and grading phases of construction. As shown in Table 23,

the combined noise level (dBA Leq) from these pieces of equipment is estimated at 84 dBA Leq at 50 feet without a pile driver, and 95 dBA Leq at 50 feet with a pile driver.

Table 23 Typical Construction Noise Level at 50 Feet

Equipment	dBA Leq at 50 Feet
Excavator, Dozer, Jackhammer *without* Impact Pile Driver	84
Excavator, Dozer, Jackhammer *with* Impact Pile Driver	95

See Appendix D for RCNM results.

Construction noise levels would vary depending on the type of equipment, the duration of use, the distance to receivers, and the potential for pile driving. Engine noise reduction technology, including silencers, continues to improve, but heavy construction equipment still generates noise exceeding ambient levels that could cause intermittent annoyance to nearby receivers. Noise associated with construction of most development under the proposed HEU would be typical of residential construction in urban areas.

However, construction noise could exceed the 75 or 80 dBA L_{eq} standard for maximum construction noise levels for residential districts shown in Table 20 and Table 21. These standard are included in the LAMC and are required when technically and economically feasible. Future development would be required to comply with construction and demolition noise limits for mobile and stationary equipment pursuant to Section 6.16.070(B)(6) of the LAMC, as well as allowed construction hours of 7 a.m. to 7 p.m. on weekdays and 9 a.m. to 6 p.m. on Saturdays for all zoning districts excluding single-family zoning districts, and 7 a.m. to 5:30 p.m. on weekdays and 9 a.m. to 3 p.m. on weekends for single-family zoning districts pursuant to Chapter 6.16 of the LAMC. Nonetheless, construction noise impacts could still be potentially significant and mitigation is required.

Operational Noise

ON-SITE OPERATIONAL NOISE

Noise generated by on-site activities for new development would be subject to the City's exterior noise limits listed in Table 19. On-site operational noise for residential uses would include air conditioning (HVAC) equipment, stationary heating, ventilation, on-site vehicle movement (e.g., trash handling), and outdoor activities. To analyze potential HVAC noise impacts, a typical to larger-sized residential condenser such as a Carrier 38HDR060 split system condenser was used. The manufacturer's noise data lists the unit as having an A-weighted sound power level of 72 dBA and a sound pressure level of 57 dBA at a distance of 5 feet (Carrier 2011). For large buildings, such units are typically located on the roof, where operational noise is greatly reduced by distance and the intervening building itself; however, for smaller buildings including smaller multi-family residential units, large HVAC units are often placed at ground level on a concrete pad adjacent to the building. Existing noise sensitive receivers could be affected by operational noise occurring on-site at properties developed under proposed HEU. However, noise levels from HVAC equipment associated with the proposed HEU would be comparable to noise levels of HVAC equipment associated with the existing urban environment. Additionally, future development would be required to comply with Table 6 of LAMC Section 6.16.070(B)(12) which lists noise limits for HVAC equipment. Therefore, operation of HVAC equipment would have a less than significant noise impact.

Future residential development may increase the number of delivery and trash hauling trucks traveling through the city to individual development sites. Increased delivery and trash hauling

trucks could intermittently expose various sensitive receivers to increased truck noise. Section 23130 of the California Motor Vehicle Code establishes maximum sound levels of 86 dBA L_{eq} at 50 feet for trucks operating at speeds less than 35 miles per hour. While individual delivery truck and/or loading or trash pick-up operations would likely be audible at properties adjacent to individual development, such operations are already a common occurrence in the urban environment. In addition, solid waste pick-up operations are typically scheduled during daytime hours when people tend to be less sensitive to noise. Furthermore, these noise events from trucks are typically transient and intermittent, and do not occur for a sustained period of time. Therefore, the project would not result in a substantial permanent increase in ambient noise levels from trash and delivery trucks due their prevalence in the city, resulting in a less than significant impact.

Housing developments would generate noise from conversations, music, television, or other outdoor sound-generating equipment (e.g., leaf blowers), particularly in the event future residents maintain open windows or such activities take place on balconies. However, these noise-generating activities would be similar to those of the existing urban environment. Section 6.16.070(11) of the LAMC restricts operation of lawn and garden tools from 8 a.m. to 8 p.m. from Monday to Friday and 9 a.m. to 6 p.m. from Saturday to Sunday; and restricts the use of portable electric powered blowers from 9 a.m. to 5 p.m. from Monday to Sunday. Furthermore, Section 6.16.070(B)(15)(b) of the LAMC prohibits the use of portable gasoline-powered leaf blowers which would further reduce noise levels within Los Altos. Additionally, Section 12.10.010 of the LAMC includes the 2019 California Residential Code, as adopted in Title 24 Part 2.5 of the California Code of Regulations. Required compliance with code enforcement would reduce operational noise impacts related to conversations and sound-generating equipment to a less than significant level.

Off-Site Operational Noise

The project allows for higher density/intensity land uses in some areas of Los Altos than currently permitted, leading to additional vehicle trips on area roadways. Under full buildout of the project, an estimated 1,648 new units would be added to Los Altos. By generating new vehicle trips, new development would incrementally increase the exposure of land uses along roadways to traffic noise.

Development facilitated by the project would increase vehicle trips and VMT in Los Altos, depending on the location and intensity of individual projects. As discussed under Section 3, *Air Quality*, the proposed HEU would increase residential VMT from 2015 conditions by 17 percent. It is unlikely that a VMT growth of 17 percent would result in a 100 percent increase in traffic volumes on a given roadway segment. As discussed in the Environmental Setting, a 3 dBA increase is considered noticeable. A 40 percent increase in trips equates to a noise increase of less than 1.5 decibels. A 1.5 dBA increase in noise would not be perceptible, and the increase in traffic volumes on any given roadway segment is expected to be below 40 percent. A doubling of traffic volumes would be required to reach the threshold of noticeability (a 3-dba increase in noise levels). A doubling of traffic volumes on a roadway (i.e., a 100 percent increase) is not anticipated under the project, considering VMT is only anticipated to increase by 17 percent.

Traffic volumes on streets would not increase by 40 percent on average, and therefore increases in traffic noise would be less than perceptible. Increases in roadway noise would be less than significant.

Mitigation Measures

The following mitigation measure is required:

NOI-1 Construction Noise Reduction Measures

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

> *For development projects involving construction within 50 feet of sensitive receivers, the applicant shall develop a site-specific Construction Noise Reduction Program prepared by a qualified acoustical consultant to reduce construction noise impacts to the maximum extent feasible, subject to review and approval of the Planning Director in advance of issuance of building permits. The following measures to minimize exposure to construction noise shall be included:*

1. ***Mufflers**. During excavation and grading construction phases, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.*
2. ***Air compressors**. Utilize "quiet" models of air compressors and other stationary noise sources to the greatest extent practicable. Select hydraulically or electrically powered equipment and avoid pneumatically powered equipment where feasible.*
3. ***Pile driving**. If pile driving is required, pre-drill foundation pile holes to minimize the number of impacts required to seat the pile. Examine whether the use of sonic pile driving is feasible and quieter. If so, utilize that method.*
4. ***Stationary Equipment**. All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receivers. Construct temporary noise barriers or partial enclosures to acoustically shield such equipment to the maximum extent feasible.*
5. ***Equipment Staging Areas**. Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receivers.*
6. ***Smart Back-up Alarms**. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.*
7. ***Perimeter Noise Reduction.** Construct solid plywood fences around construction sites adjacent to operational business, residences or other noise-sensitive land uses where the noise control plan analysis determines that a barrier would be effective at reducing noise.*
8. ***Signage**. For the duration of construction, the applicant or contractor shall post a sign in a construction zone that includes contact information for any individual who desires to file a noise complaint.*

Significance After Mitigation

Implementation of mitigation measure NOI-1 would reduce construction noise levels by an estimated 10-20 dBA. Temporary noise barriers would provide up to 10 dBA of noise reduction and eliminating traditional back-up alarms, locating stationary equipment as far as possible or within an

enclosure, shielding impact tools, and limiting idling time would provide an additional 5-10 dBA reduction. Therefore, with mitigation, impacts would be reduced to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

It is not anticipated that operation of residential housing development would involve activities that would result in substantial vibration levels, such as use of heavy equipment or machinery. Operational groundborne vibration in the vicinity of development associated with the proposed HEU would be primarily generated by vehicular travel on the local roadways. According to the FTA *Transit Noise and Vibration Impact Assessment* (2018) guidance document, rubber tires and suspension systems dampen vibration levels from trucks to a level that is rarely perceptible. Therefore, traffic vibration levels associated with the expected additional trips from the proposed HEU would not be perceptible by sensitive receivers. Impacts related to operational groundborne vibration would be less than significant. The remainder of this analysis focuses on impacts relate to construction activities associated with future housing development.

Construction activities associated with housing development accommodated by the proposed HEU would result in varying degrees of groundborne vibration depending on the equipment and methods employed. Construction equipment causes vibration that spreads through the ground and diminishes in strength with distance. Buildings with foundations in the soil in the vicinity of a construction site respond to these vibrations with varying results ranging from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibrations at moderate levels, and slight damage at the highest levels. Construction vibration is a localized event and is typically only perceptible to a receiver that is in close proximity to the vibration source.

Construction for housing development would require heavy equipment, particularly development with certain geologic conditions that may require pile driving. Pile driving would be required if the project engineer determined that it was necessary and pile driving alternatives were not feasible. Pile driving more often occurs for buildings with subterranean parking garages or tall buildings (e.g., six or more stories). Such heavy equipment could potentially operate within 25 feet of nearby buildings when accounting for equipment setbacks. As shown in Table 24, general construction equipment such as a vibratory roller would generate vibration levels up to 0.21 in./sec. PPV at 25 feet, while more intensive equipment such as pile driving could generate a vibration level of approximately 0.64 in./sec. PPV at 25 feet.

Table 24 Typical Construction Equipment Vibration Levels

Equipment	PPV (in./sec.)				
	25 Feet	50 Feet	75 Feet	100 Feet	125 Feet
Pile Driver (Impact)	**0.644**[1,2,3,4]	**0.300**[1,4]	**0.192**[1]	**0.140**[1]	**0.110**[1]
Pile Driver (Sonic)	**0.170**[1]	0.079	0.051	0.037	0.029
Vibratory Roller	**0.210**[1]	0.098	0.063	0.046	0.036
Hoe Ram	0.089	0.042	0.027	0.019	0.015
Large Bulldozer	0.089	0.042	0.027	0.019	0.015
Caisson Drilling	0.089	0.042	0.027	0.019	0.015
Loaded Truck	0.076	0.036	0.023	0.017	0.013
Jackhammer	0.035	0.016	0.011	0.008	0.006
Small Bulldozer	0.003	0.001	<0.001	<0.001	<0.001

Notes: Vibration levels shown in bolded and underlined text exceed one or more of the Caltrans criteria shown in Table 4.11-1 and Table 4.11-2. Superscripts specify the threshold exceeded by each piece of equipment.

[1] Exceeds the 0.1 in./sec. Caltrans damage threshold for historic sites (and other critical locations).

[2] Exceeds the 0.5 in./sec. Caltrans damage threshold for historic and other/similar old buildings.

[3] Exceeds the 0.5 in./sec. Caltrans damage threshold for older residential structures.

[4] Exceeds the 0.25 in./sec. Caltrans human annoyance threshold.

Sources: FTA 2018; Caltrans 2020

The City has not adopted a significance threshold to assess vibration impacts during construction and operation. Therefore, the Caltrans Transportation and Construction Vibration Guidance Manual (2020) was used to evaluate potential construction vibration impacts related to both potential building damage and human annoyance. Construction vibration impacts from housing development would be significant if vibration levels exceed the Caltrans criteria shown in Table 17 and Table 18, using the lower range of the thresholds. For example, impacts would normally be significant if vibration levels exceed 0.2 in./sec. PPV for residential structures and 0.5 in./sec. PPV for commercial structures. This is the limit where minor cosmetic (i.e., non-structural) damage may occur to these buildings. However, groundborne vibration would also have the potential to impact structures with historic significance at much lower levels. Therefore, for a conservative analysis of potential impacts to such buildings, construction vibration impacts would be significant if vibration levels exceed 0.12 in./sec. PPV for extremely fragile historic buildings, as shown in Table 17. In addition, construction vibration impacts would cause human annoyance at nearby receivers if vibration levels exceed 0.25 in./sec. PPV, which is the limit where vibration becomes distinctly perceptible to most humans, as shown in Table 18. Vibration levels shown in bolded and underlined text in Table 24, exceed one or more of the Caltrans criteria shown in Table 17 and Table 18.

As shown in Table 24, groundborne vibration from hoe rams, bulldozers, caisson drilling, loaded trucks, and jackhammers would not exceed the 0.12 in./sec. PPV threshold. While groundborne vibration from vibratory rollers would only exceed the threshold for building damage for historic sites at 25 feet from the source, vibration levels from pile driving would exceed one or more of the building damage thresholds shown in Table 17 for historic sites, general old buildings, and older and newer residential structures. Furthermore, vibration levels associated with pile driving would also exceed the threshold of 0.25 in./sec. PPV for human annoyance at various distances up to 75 feet, as shown in Table 24. Therefore, vibration impacts could be potentially significant and mitigation measure NOI-2 would be required.

Mitigation Measure

The following mitigation measure is required:

NOI-2 Vibration Control Plan

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

For projects involving vibratory rollers within 25 feet of a historic structure, and/or the use of pile drivers, the applicant shall prepare a Vibration Control Plan prior to the commencement of construction activities. The Vibration Control Plan shall be prepared by a licensed structural engineer and shall include methods to minimize vibration, including, but not limited to:

- *Use of drilled piles or similar method (e.g., cast-in-place systems) rather than pile driving*
- *Use of resonance-free vibratory pile drivers/rollers*
- *Avoiding the use of vibrating equipment when allowed by best engineering practices*

The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions of buildings within a 50-foot radius as well as at potentially affected extremely fragile buildings/historical resources and/or residential structures within the vicinity of the construction site. The condition of existing potentially affected properties shall be documented by photos and description of existing condition of building facades, noting existing cracks. The survey letter shall provide a shoring design to protect such buildings and structures from potential damage. At the conclusion of vibration causing activities, the qualified structural engineer hired by the applicant shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed by the contractor and monitored by a qualified structural engineer in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).

A Statement of Compliance signed by the applicant and owner is required to be submitted to the City Building Department at plan check and prior to the issuance of any permit. The Vibration Control Plan, prepared as outlined above, shall be documented by a qualified structural engineer, and shall be provided to the City upon request. A Preservation Director shall be designated, and this person's contact information shall be posted in a location near the project site that it is clearly visible to the nearby receivers most likely to be disturbed. The Director will manage complaints and concerns resulting from activities that cause vibrations. The severity of the vibration concern should be assessed by the Director, and if necessary, evaluated by a qualified noise and vibration control consultant.

Significance After Mitigation

Implementation of Mitigation Measure NOI-2 would require a vibration control plan to reduce impacts associated with vibration from vibratory rollers or pile driving to below thresholds. With mitigation, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT WITH MITIGATION

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 two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The City of Los Altos is not located within 2 miles of a public airport or a private airstrip. The closest airport is the San Jose International Airport, located approximately 7 miles east of the City limits. Development facilitated under the proposed HEU would not increase exposure of residents to excessive noise levels from an airport and there would be no impacts related to aviation-related noise exposure.

NO IMPACT

14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	■
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

Environmental Setting

Table 25 provides 2022 estimates of population and housing for Los Altos. Los Altos has an estimated 2022 population of 31,526 people and 11,841 housing units, with an average household size of 2.78 people (California Department of Finance 2022).

Table 25 Current Population and Housing Stock for Los Altos

	City of Los Altos	Santa Clara County
Population (# of people)	31,526	1,894,783
Average Household Size (persons/household)	2.78	2.81
Total Housing Units (# of units)	11,841	696,489
Vacant Housing Units	578 (4.9%)	34,855 (5.0%)

Source: California Department of Finance 2022

Plan Bay Area 2050 is the most recent regional long-range plan and regional growth forecast for the Bay Area (ABAG and MTC 2021). Though it does not include projections by city, it does include employment and housing projections for Northwest Santa Clara County which includes Los Altos Hills, Los Altos, part of Palo Alto, and part of Mountain View. These projections are shown in Table 26.

Table 26 2050 Plan Bay Area Population, Housing, and Employment Projections for Northwest Santa Clara County

	2015	2050 (Projected)	Projected Growth (Percent Increase)
Housing (# of units)	74,000	102,000	28,000 (38%)
Employment (# of jobs)	180,000	207,000	27,000 (15%)

Source: ABAB and MTC 2021

Impact Analysis

a. Would the project 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)?

For the purposes of this analysis, buildout under the proposed HEU would add up to 1,648 additional residential units to the city by the year 2031. Based on an estimated number of 2.78 residents per household as shown in Table 25, this additional housing would lead to an increase of approximately 4,582 residents in the city during the housing element cycle 2023 to 2031 assuming all of the estimated 1,648 units are built.

In the unlikely event that all potential buildout that is proposed in the HEU occurs, and assuming the growth is all new and not already accounted for under existing projections, the total population of the city in 2031 would be 36,108 (31,526 current population + 4,582 new residents), or a population increase of approximately 14.5%. In addition, the total housing of units in Los Altos would be an estimated 13,489 (11,841 current housing units + 1,648 units), or a housing increase of approximately 13.9 percent. The proposed project would be consistent with State requirements for the RHNA and would be within the growth forecasts for Northwest Santa Clara County in Plan Bay Area 2050, which projects a 38 percent increase in housing for Northwest Santa Clara County.

Further, growth under the proposed HEU would be concentrated in locations where such development is encouraged by adopted plans due to their proximity to transit and transportation corridors. All the baseline units are proposed in areas that are currently used for residential purposes and are therefore connected to commonly used transportation corridors. Additionally, the rezoned sites are mostly centered around the Downtown and major transportation corridors.

In addition, the State requires that all local governments adequately plan to meet the housing needs of their communities. Given that the State is currently in an ongoing housing crisis due to an insufficient housing supply, the additional units under the proposed project would further assist in addressing the existing crisis and meeting the housing needs of the City's communities. Furthermore, the proposed HEU would first be submitted to the HCD for review and approval to ensure that it would adequately address the housing needs and demands of the city. Approval by the HCD would ensure that population and housing growth under the 2023-2031 Housing Element would not be substantial or unplanned.

Lastly, this analysis is conservative because it assumes a maximum buildout scenario and includes sites already planned for development and maximum buildout under the proposed zoning changes. The project's actual contribution to population growth may be less than estimated. In addition, the project would not involve the extension of roads or other infrastructure that could indirectly lead to population growth. The city is mostly developed and is supported by existing public services and infrastructure which are sufficient to serve the additional housing units. Therefore, the project would not result in substantial unplanned population growth, either directly or indirectly. There would be no impact.

NO IMPACT

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

"Substantial" displacement would occur if the proposed project would displace more residences than would be accommodated through growth facilitated by the project. The goal of the proposed project is to accommodate and encourage new residential development in Los Altos. A portion of the housing units would be developed at a density range that could accommodate low and very low-income housing as required to meet the 6th Cycle RHNA. Development under the proposed HEU could result in up to an estimated 1,648 new housing units developed by 2031. The proposed buildout, in addition to existing and planned housing projects, would result in an overall increase in available housing which exceeds the City's RHNA requirements. Therefore, overall, the proposed HEU would add to the City's housing stock to meet housing goals.

On an individual site basis, it is possible that some redevelopment projects could result in displacement of current residents. However, the proposed HEU includes policies and programs to reduce displacement impacts. For example, Program 5.C. restricts commercial use in residential areas to protect residents against displacement. Further, the HEU includes Program 6.E. which outlines the City's plan to produce and distribute anti-displacement information in multiple languages to ensure residents are educated on their rights and connect them to relevant resources. Distributing this information in multiple languages through community organizations and local groups will allow the city to reach those groups that may be at the greatest risk of displacement. Additionally, the HEU includes Policy 6.4 which implements anti-displacement measures in accordance with Government Code §66300(d)(2)(D)(ii).

In summary, the proposed project would facilitate the development of 1,648 additional dwelling units throughout Los Altos. Proposed residential units would provide additional housing opportunities in excess of the RHNA requirement for residents and there are policies in place to reduce displacement resulting from the proposed project. Therefore, the proposed project would not result in the net loss or displacement of housing necessitating the construction of replacement housing elsewhere. There would be no impact.

NO IMPACT

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15 Public Services

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:				
	1 Fire protection?	☐	☐	■	☐
	2 Police protection?	☐	☐	■	☐
	3 Schools?	☐	☐	■	☐
	4 Parks?	☐	☐	■	☐
	5 Other public facilities?	☐	☐	■	☐

Regulatory Setting

Los Altos General Plan

The Open Space, Conservation, and Community Facilities Element of the Los Altos General Plan includes the following goals and policies related to public services:

Goal 6.0: Ensure an adequate level of fire protection and police protection within Los Altos.

Policy 6.1: Promote community order by preventing criminal activity, enforcing laws, and meeting community service demands.

Policy 6.2: Provide community-oriented policing services that are responsive to citizen needs.

Policy 6.3: Provide response times for police and fire protection services emergencies that are comparable to similar jurisdictions in Santa Clara County.

Policy 6.4: Continue cooperative mutual aid agreements with nearby jurisdictions to ensure rapid and sufficient response to emergency situations.

Policy 6.5: Prevent or mitigate hazardous situations.

Goal 7.0: Work with local school districts and other educational organizations to ensure a high-quality public education system.

Policy 7.1: Continue to work with the Los Altos and Cupertino Union Elementary School Districts, Mountain View-Los Altos Union and Fremont Union High School Districts, and Foothill and De Anza Community College to provide a high-quality educational system to residents.

Methodology

This analysis considers the *CEQA Guidelines* Appendix G thresholds in determining whether the proposed HEU, including future development accommodated by the proposed HEU, would result in impacts related to the provision of public services. Public services information was acquired through review of relevant documents and communications with City staff and public service providers. The determination that the proposed HEU would or would not result in "substantial" adverse effects concerning public services considers the relevant policies and regulations established by local and regional agencies, the proposed HEU's compliance with such policies, and whether the HEU would create the need for new or expanded facilities, the construction of which could result in environmental impacts.

In *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, the Court of Appeal held that significant impacts under CEQA consist of adverse changes in the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate: "[T]he obligation to provide adequate fire and emergency medical services is the responsibility of the city. (Cal. Const., art. XIII, § 35, subd. (a)(2) ["The protection of the public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services."].) Thus, the need for additional fire and police protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

Impact Analysis

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The City of Los Altos contracts with the Santa Clara County Fire District for fire and emergency medical services. There are two fire stations in Los Altos: Almond Fire Station located at 10 Almond Avenue; and Loyola Fire Station located at 765 Fremont Avenue.

The proposed HEU would not expand the current fire service area but would result in an increased population within the existing service area, as described in Section 14, *Population and Housing*. Currently, the Santa Clara Fire District has response time goals of 5 minutes 30 seconds for urban areas and 7 minutes 30 seconds for rural areas (SCCFD 2020). The increase in residents associated with the project could increase demand for fire protection and emergency medical services such that additional staff, equipment or facilities would be needed to meet these response time goals.

The continued implementation of policies and actions in the Los Altos General Plan would allow the fire protection facilities to serve this future development. Los Altos Open Space, Conservation, and

Community Facilities Implementation Program 10 (OCC 10) calls for promoting fire prevention including continuing to provide fire protection services, increasing fire prevention education, and coordinating with local water districts to ensure there is an adequate amount of water available to fight fire. Additionally, Policy 6.3 and 6.4 of the Open Space, Conservation, and Community Facilities Element ensure there is an adequate level of fire protection for all residents of Los Altos.

Further, under the proposed HEU future development would be required to comply with Chapter 12.24 of the Los Altos Municipal Code, which includes minimum fire safety and fire prevention standards. Future development under the proposed HEU would also be required to comply with abatement of fire-related hazards and pre-fire management prescriptions as outlined under the California Health and Safety Code and the California Fire Plan. A list of fire-related requirements included in these codes and that would apply to typical residential projects allowed by the proposed HEU includes:

a. Adequate marking of exterior building openings
b. Openings and fire escape stairs and balconies
c. Internal access, including via hallways and doorways
d. Manual and automatic fire alarm systems
e. Fire Fighter Air Replenishment Systems
f. Internal building sprinkler systems
g. New fire hydrants
h. External fire protection (setbacks, fire-resistant materials, etc.)

New residential projects allowed by the proposed HEU would be reviewed for compliance with these requirements and compliance with other building and safety regulations several times during different phases of project development. Compliance with these safety standards would reduce the demand for fire protection services and thereby reduce the need for new fire stations.

Should the County determine that new or expanded facilities are needed to provide fire protection services to Los Altos, it is not known where such facilities would be located. No location has been identified for a new fire station as part of the proposed HEU. Nonetheless, this IS-MND analyzes the impact associated with development on vacant and underutilized sites throughout the city. A potential future facility would likely be developed on the same site as the current fire station or as infill development on one of the inventory sites. As infill development, it is not anticipated that the construction of a new fire station would cause additional significant environmental impacts beyond those identified in this IS-MND. The environmental effects of constructing a fire station would be consistent with the impacts determined in other sections of this IS-MND, which would be less than significant or less than significant with mitigation. When the Fire Department proposes a new station and identifies an appropriate site and funding, the city will conduct a complete evaluation of the station's environmental impacts under CEQA. Therefore, the proposed HEU would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered fire protection facilities. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Police protection services for the project site are provided by the Los Altos Police Department, headquartered at 1 North San Antonio Road. The Department has 32 sworn officers and 17 professional civilian staff (City of Los Altos 2019)

The Police Department has a goal to maintain a ratio of 2 officers per 1,000 residents. Currently, the officer ratio is approximately 1 officer per 1,000 residents. As described in Section 2, *Population and Housing*, implementation of the proposed HEU would increase the population served by the Los Altos Police Department to 36,107 people. To meet the departments' goal would require an increase of 40 officers. Policies in the City's General Plan such as OCC 10 aim to ensure that there are adequate budget allocations for staffing and crime prevention programs. Police protection service levels would continue to be evaluated and maintained by Los Altos PD in accordance with existing policies, procedures and practices as development occurs over the lifetime of the HEU.

While police protection services are not typically "facility-driven," meaning such services are not as reliant on facilities in order to effectively patrol a beat, the Police Department has indicated that expanded facilities would be needed should the department provide full staffing to meet the department's ratio of 2 officers per 1,000 residents. The Los Altos Police Department has not gone through a facility planning process and no location has been identified for a new police station as part of the proposed HEU (Chief Angela Averiett 2022). Nonetheless, this IS-MND analyzes the impact associated with development on vacant and underutilized sites throughout the city. A potential future facility would likely be developed on the same site as the current police station or as infill development on one of the inventory sites. As infill development, it is not anticipated that the construction of a new police station would cause additional significant environmental impacts beyond those identified in this IS-MND. The environmental effects of constructing a police station would be consistent with the impacts determined in other sections of this IS-MND, which would be less than significant or less than significant with mitigation. When the Police Department proposes a new station and identifies an appropriate site and funding, the city will conduct a complete evaluation of the station's environmental impacts under CEQA.

Therefore, the proposed HEU would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered police protection facilities. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Los Altos is served by five school districts: Los Altos Elementary School District, Cupertino Union Elementary School District, Mountain View-Los Altos Union High
School District, and Fremont Union High School District.

Development under the proposed project could generate new students entering all five districts serving Los Altos. These students would be distributed throughout the schools that serve Los Altos

depending on their grade level and on their location. Although the proposed HEU would result in an increase in enrollment at schools that serve the city, most of the districts report net declines in enrollment projected over the next 10 years.

Cupertino Union Elementary School District reports a projected decline in enrollment for all grade levels over the next 10 years even when accounting for increased housing development occurring over the same time period. Therefore, there is no planned improvements or expansions to schools in this district (CUSD Annual Enrollment Projection Report 2022).

Mountain View-Los Altos Union High School District reports a projected increase in enrollment and then a subsequent decline by the 2025-2026 school year. To accommodate the initial significant increase in enrollment that is projected, the district is advised to increase facility capacity and add additional classrooms to existing schools. The plan to expand these facilities is not included in the proposed HEU and would undergo an independent CEQA review (MVLASD Demographic Analysis and Enrollment Projections 2017).

Most schools in the Fremont Union High School District report there is a decline in enrollment which is projected to decline further through 2024. The projected increase in enrollment from new housing developments such as those proposed by the HEU would not be sufficient to substantially offset the reduction in enrollment from existing dwellings. The district has no plans to expand or build new facilities (FUHSD Forecast Report 2019).

The only district serving Los Altos that projects a steady net increase in enrollment is the Los Altos Elementary School District. The district reports that it has experienced a 23 percent increase in public school enrollment over the last decade and many schools in the district area at or near peak enrollment. They expect enrollment will continue to increase into the future. Because of the LASD Board's desire to keep schools close to neighborhoods and to keep enrollment at each school in the district below 600 students, the Superintendent's Enrollment Growth Task Force identified a need for two additional school sites, one for Bullis Charter School which operates outside the Los Altos School District and the other to support Los Altos Elementary School District students. While a specific site for these facilities has not been chosen, the Enrollment Growth Task Force recommended that sites near the El Camino Corridor or otherwise in the center of the District be chosen due to the increase in housing in these areas. In 2018, four sites were selected for further review (LASD 2013).

As discussed in Regulatory Setting, to offset a project's potential impact to schools Government Code 65995 (b) establishes the base amount of allowable developer fees a school district can collect from development projects located within its boundaries. The fees obtained by school districts that serve Los Altos are used for construction or reconstruction of school facilities. Future development facilitated by the proposed project would be required to pay school impact fees which, pursuant to Section 65995 (3) (h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), are "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization."

For the facility expansions in Los Altos Elementary School District and Mountain View-Los Altos Union High School District the construction of facilities will require a project-specific environmental analysis under CEQA to address site-specific environmental concerns. As described above, existing laws and regulations require funding for the provision or expansion of new school facilities to offset impacts from new residential development and therefore impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

See Section 16, *Recreation.*

LESS THAN SIGNIFICANT IMPACT

a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impacts related to other public facilities such as water, wastewater, storm water systems, and landfills are addressed in Section 10, *Hydrology and Water Quality,* and Section 19, *Utilities and Service Systems*.

LESS THAN SIGNIFICANT IMPACT

16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project 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?	☐	☐	■	☐
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?	☐	☐	■	☐

Environmental Setting

Los Altos is home to 18 parks and recreation facilities which make up approximately 47.5 acres of City land (Los Altos Facility and Parks 2020). Based on the current population of 31,526 (see Table 25), Los Altos currently maintains a ratio of 1.5 acres of City-owned parkland per 1,000 residents. In addition to the public open space managed by the City's Department of Recreation and Community Services, there are multiple County Parks and open space preserves such as Rancho San Antonio County Park & Open Space Preserve (165 acres of designated park space), Byrne Preserve (88 acres), and Foothills Nature Preserve (212 acres) near Los Altos. When considering parkland adjacent, the ratio of parkland per resident is approximately 16.3acres per 1,000 residents.

According to the Los Altos General Plan, the City has adopted a park dedication requirement for new subdivisions of 5.0 acres per 1,000 residents is implementing programs under its General Plan to increase purchase of land for parks as well as encouraging the development of parkland by public and private landowners.

Regulatory Setting

Los Altos General Plan

The Open Space, Conservation, and Community Facilities Element of the Los Altos General Plan includes the following goals and policies related to parks and recreation:

Goal 1.0: Preserve and expand the amount of open space in and around Los Altos.

Policy 1.1: Preserve existing parks and establish new neighborhood parks to enhance neighbor- hood identity within Los Altos.

Policy 1.2: Continue to identify and acquire additional land for parks and recreational uses.

Policy 1.3: Maintain dedicated parkland in public ownership.

Policy 1.4: Require Park dedication, public open space, or require fees in lieu thereof, for all new subdivisions and multi- family residential development in Los Altos.

Policy 1.5: Retain and update appropriate building regulations to preserve community identity.

Goal 3.0: Expand recreation programs and facilities for all ages using City and non- City sites.

Policy 3.1: Encourage development of a comprehensive Recreation Plan for existing and future park facilities and recreation services.

Policy 3.2: Continue to seek cooperative use of school facilities for recreation programs.

Policy 3.3: Provide and expand continuing support for children and teen facilities and programs.

Policy 3.4: Promote and provide programs and recreation facilities for seniors.

Policy 3.5: Ensure the availability of community pool facilities.

Goal 4.0: Ensure proper maintenance of parks, open space, and public facilities.

Policy 4.1: Provide adequate level of maintenance for City parks, open space, and public property to ensure safety, aesthetics, and recreational enjoyment for Los Altos residents.

Policy 4.2: Provide opportunity to create assessment districts for unique or maintenance needs.

Impact Analysis

a. Would the project 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 HEU does not include the provision of new parks or the physical alteration of existing parks or recreation centers. As described in Section 14, *Population and Housing*, full buildout under the proposed HEU would increase the population in Los Altos by 4,582 new residents by 2031, which would increase the demand and use of parks and recreational facilities. The additional demand could cause physical deterioration of existing parks and recreational facilities. With the proposed HEU, the ratio of parks to residents in the city would decrease from 1.5 acres of parkland per 1,000 residents to 1.3 acres of parkland per 1,000 residents. When considering the nearby parks and open space preserves, the ratio of parkland per resident would decrease to approximately 14.2 acres per 1,000 residents.

Policies and actions in Los Altos' Open Space, Conservation, and Community Facilities Element referenced above are designed to ensure that adequate parks and recreational facilities are provided to accommodate increases in new residents. In accordance with General Plan policies, the City continually evaluates and plans for expansion or renovations of parks and recreation facilities as need to accommodate demand. Policy 1.1-1.3 of the Open Space, Conservation, and Community Facilities Element of the General Plan ensure the City actively seeks to preserve and expand parks to meet the needs of Los Altos residents. Further, the City of Los Altos has established a Parkland Dedication Ordinance (Chapter 13.24.010 of the Municipal Code) along with policy 1.4 of the Open Space, Conservation, and Community Facilities Element of the General Plan requiring residential

subdivisions to dedicate land for park or recreational purposes, or pay a fee in-lieu thereof, as a condition of approval for the final subdivision or parcel map. The intent of these policies is to allow development to occur within the city in a manner that meets the city's parks and recreation goals. The city provides and maintains developed parkland and open space to serve its residents. Residents of Los Altos are served by community park facilities, neighborhood parks, playing fields and community centers. The City's Department of Recreation and Community Services is responsible for development, operation, and maintenance of all city park facilities. In accordance with the City of Los Altos Parkland Dedication Ordinance (Chapter 13.24.010 of the Municipal Code) and Policy 1.4, future project applicants will be required to pay the applicable parkland dedication in-lieu fee as a condition of project approval.

Adherence to City of Los Altos General Plan goals and policies as well as the LAMC would ensure that substantial physical deterioration of the city's parks and recreational facilities would not occur or be accelerated. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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?

As discussed under checklist question (a), policies and actions in the Open Space, Conservation, and Community Facilities Element of the city's General Plan as well as Chapter 13.24.010 of the LAMC would ensure that the city provides and maintains developed parkland and open space to serve its residents and that development would occur in a manner that meets the city's parks and recreation goals. Should future park or recreational facilities be identified for construction, it is not known where such facilities would be located. No location has been identified for new facilities of the proposed HEU. Nonetheless, this document analyzes the impact associated with development on vacant and underutilized sites throughout Los Altos. A potential future facility would likely be developed as infill development on one of the inventory sites. As infill development, it is not anticipated that the construction of facilities in would cause additional significant environmental impacts beyond those identified in this analysis. The environmental effects of constructing facilities would be consistent with the impacts determined in other sections of this document, which would be less than significant or less than significant with mitigation with the exception of impacts related to historical resources and construction noise. When and if the Parks Department proposes new facilities and identifies an appropriate site and funding, the City will conduct a complete evaluation of the station's environmental impacts under CEQA. Adherence to City of Los Altos General Plan goals and policies as well as the LAMC would ensure that impacts from construction of new parks and enhancements to existing parks are reduced to the extent feasible. Impacts to parks and recreation would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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 15064.3, subdivision (b)?	☐	■	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	■	☐
d. Result in inadequate emergency access?	☐	☐	■	☐

Environmental Setting

Los Altos is immediately adjacent to I-280 and SR 85 and is served by two subregional facilities: Foothill Expressway and El Camino Real (SR 82). El Camino Real is a major arterial roadway within Los Altos, and San Antonio Road and El Monte Avenue are the minor arterials. The Santa Clara Valley Transportation Authority (VTA) operates bus, light rail transit, and paratransit throughout Santa Clara County. Bus transit service within Los Altos includes six fixed routes (Routes 22, 23, 34, 51, 52, and 300), and paratransit service (dial-a-ride service for qualified individuals). VTA light rail service can be accessed at the Downtown Mountain View Transit Center, and Caltrain provides heavy rail passenger service between Gilroy in Santa Clara County, through San Mateo County, to San Francisco. The closest Caltrain stations to Los Altos are located on Central Expressway near San Antonio Road and also near Castro Street at the Downtown Mountain View Transit Center. Los Altos also contains Class I, II, and III bicycle lanes on most transportation corridors such as San Antonio Road, Foothill Expressway, and University Avenue, as well as bicycle parking facilities scattered around the city.

Regulatory Setting

State Senate Bill 743

Senate Bill (SB) 743 was signed into law by Governor Brown in 2013 and tasked the State Office of Planning and Research (OPR) with establishing new criteria for determining the significance of transportation impacts under the California Environmental Quality Act (CEQA). SB 743 requires the new criteria to "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." It also states that alternative

measures of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

On September 27, 2013, California Governor Jerry Brown signed SB 743 into law and started a process that changes transportation impact analysis as part of CEQA compliance. SB 743 requires the Governor's OPR to identify new metrics for identifying and mitigating transportation impacts within CEQA. In January 2018, OPR transmitted its proposed CEQA Guidelines implementing SB 743 to the California Natural Resources Agency for adoption, and in January 2019 the Natural Resources Agency finalized updates to the CEQA Guidelines, which incorporated SB 743 modifications, and are now in effect. SB 743 changed the way that public agencies evaluate the transportation impacts of projects under CEQA, recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (Public Resource Code, § 21099 (b)(2)). In addition to new exemptions for projects consistent with specific plans, the CEQA Guidelines replaced congestion-based metrics, such as auto delay and level of service (LOS), with VMT as the basis for determining significant impacts, unless the Guidelines provide specific exceptions.

Impact Analysis

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The city's Circulation Element of the Los Altos General Plan addresses circulation improvements needed to provide adequate capacity for future land uses. The Circulation Element uses level of service (LOS) as its performance criteria while analyzing the city's roadway system. However, as described in Regulatory Setting, to implement SB 743, the CEQA Guidelines have been updated to change the criteria for determining what constitutes a significant traffic related environmental impact to rely upon quantification of VMT instead of LOS. Nonetheless, the project would be consistent with the Circulation Element since it would place housing near transit, services, and jobs, which would reduce the usage of single-occupancy vehicles and encourage walking, bicycling, and using alternative modes of transportation.

Bicycling would be encouraged through the City's Bicycle Transportation Plan (City of Los Altos 2012) which aims to improve bicycling conditions and increase bicycling rates within Los Altos. Additionally, the City recently adopted its Complete Streets Master Plan (City of Los Altos 2022d) which aims to provide a long-term vision for improving walking and bicycling in Los Altos as well as access to transit, schools, and Downtown. Future residents would be able to benefit from goals, policies, and improvements associated with the Bicycle Transportation Plan and the Complete Streets Master Plan which would reduce VMT and reliance on single-occupancy vehicles.

Future multi-family development facilitated under the project would be subject to design and transportation review pursuant to LAMC Section 14.78.090 and would be assessed for potential project impacts to various modes of transportation such as bicycle, pedestrian, parking, traffic impacts on public streets, and/or public transportation. Development proposals for individual projects would be subject to adopted development guidelines, including standards that govern VMT, transportation, GHG, and associated issues. Impacts identified for development facilitated by the plan would be addressed through the project approval process, including design review specific to potential impacts of that project. Because the proposed HEU does not include modifications to the existing transportation network and individual future developments would be designed consistent with applicable bicycle and pedestrian facility requirements, the proposed HEU would

not conflict with the City's existing circulation, bicycle, or pedestrian plans. Impacts to transit, roadway, bicycle, and pedestrian facilities would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

CEQA Guidelines Section 15064.3(b) require specific considerations of a plan or project's transportation impacts based on vehicle miles traveled (VMT). This implements SB 743, which eliminates level of service as a basis for determining significant transportation impacts under CEQA and requires a different performance metric: VMT. With this change, the State shifted the focus from measuring a plan or project's impact upon drivers (LOS) to measuring the impact of driving (VMT) on achieving its goals of reducing GHG emissions, encouraging infill development, and improving public health through active transportation.

Hexagon Transportation Consultants, Inc. prepared a transportation study (Appendix A) for the proposed HEU to conduct a VMT analysis consistent with CEQA guidelines to determine whether the proposed HEU project would generate a VMT impact. Given that the City of Los Altos has not formally adopted a local VMT policy, the HEU was analyzed according to the City's interim VMT policy. The Interim VMT Policy sets a threshold of significance for residential VMT per capita at 15 percent below the regional average of 13.95 VMT per capita. Therefore, the threshold is 11.86 daily VMT per capita. Any project above the threshold would need to mitigate its impacts to less than significant.

To determine whether a project would result in CEQA transportation impacts related to VMT, the Santa Clara Valley Transportation Authority (VTA) travel demand forecasting (TDF) model was used. VTA also has developed the Santa Clara County map-based VMT Evaluation Tool, based on the model forecasts, to streamline the analysis for development projects located within the County. The TDF model and the map based VMT evaluation tool were used to estimate VMT for the proposed housing sites and determine whether the location of the housing sites would result in significant VMT impacts. In addition to the location based VMT evaluation methodology using the County VMT Evaluation Tool, HEU sites planned for affordable housing or sites that generate or attract fewer than 110 trips per day (considered as small projects) would be screened out from further VMT analysis per the Office of Planning and Research (OPR) guidelines.

As discussed in Appendix A, of the housing inventory sites, 954 units within the sites are located in areas below the City's residential VMT threshold of 11.86 VMT per capita; 388 units are located on parcels with existing VMT between the City's residential threshold and the regional average of 13.95 VMT per capita; 292 units are located on parcels with existing VMT greater than the regional average; and 14 units are located on parcels with existing VMT greater than the residential threshold. Projects located in areas where the existing VMT is above the established threshold are referred to as being in "high-VMT areas." Projects in high-VMT areas are required to include a set of VMT reduction measures that would reduce the project VMT to the greatest extent possible. The VMT evaluation tool evaluates a list of selected VMT reduction measures that can be applied to a project to reduce the project VMT.

For the housing inventory sites that are located in areas with residential VMT over the 11.86 VMT per capita threshold, the proposed developments identified in these areas would likely be single-family or multi-family developments that would generate fewer than 110 daily vehicle trips. Pursuant to OPR guidelines, these housing sites would be screened out from further VMT analysis

and would be presumed to have a less than significant VMT impact. Further, it should be noted that most of these inventory sites are baseline sites that do not involve rezoning and could be built out to this density under current zoning.

However, two sites (APN #18956014 and #31801036) located on parcels with existing VMT between the City's residential threshold and the regional average of 13.95 VMT per capita and four sites (APN #31816022, #32601052, #32601053, and #33609018) located on parcels with existing VMT greater than the regional average are located in "high-VMT" areas and wound not be screened out and would need to implement further mitigation strategies. Therefore, this impact is potentially significant.

Hexagon Transportation Consultants also prepared a cumulative analysis that calculates the change in citywide VMT as a result of the proposed HEU (Table 1 in Appendix A). VMT forecasts were developed using the VTA Travel Demand Forecasting Model. Two future land use scenarios were evaluated: Cumulative (2040) No Project Conditions and Cumulative (2040) Conditions with the HEU. The Cumulative (2040) No Project scenario includes local and regional roadway improvements and land use projections consistent with ABAG Projections 2017 in the rest of the region but assumes no growth in housing units in Los Altos. The Cumulative (2040) conditions with the HEU assumes the addition of 1,648 residential units to the City's housing inventory. Table 27 presents the results of the VMT analysis. The table shows that the VMT per resident would decrease by 0.17, from 13.08 under cumulative (2040) no project conditions to 12.90 with the HEU. Since the HEU buildout year is 2031, the VMT forecasts for the cumulative (2031) no project and cumulative (2031) with HEU scenarios were extrapolated using the existing and cumulative 2040 VMT forecasts from the VTA model. As shown in Table 27, the VMT per resident under cumulative (2031) with HEU would decrease by 0.14, from 12.85 under cumulative (2031) no project conditions to 12.71 with the HEU resulting in a less-than-significant VMT impact. Therefore, this impact would be less than significant.

Table 27 Cumulative Vehicle Miles Traveled Analysis

Scenario	Residential VMT[1]	Housing Units	Population	VMT Per Resident[2]
Cumulative (2031) No Project	415,472	11,847	32,322	12.85
Cumulative (2031) Plus HEU	467,012	13,495	36,756	12.71
Cumulative (2040) No Project	424,782	11,905	32,478	13.08
Cumulative (2040) Plus HEU	476,322	13,553	36,912	12.90

[1] Residential VMT = daily home-based vehicle trips x travel distance

[2] VMT per resident = residential VMT/population

Source: Hexagon Transportation Consultants, Inc 2022 (Appendix A)

Mitigation Measures

The Santa Clara County VMT Evaluation Tool evaluates a list of selected VMT reduction measures that can be applied to a project to reduce the project VMT. There are four strategy tiers whose effects on VMT can be calculated with the VMT evaluation tool:

- ***Tier 1:*** *Project characteristics that encourage walking, biking, and transit uses.*
- ***Tier 2:*** *Multimodal network improvements that increase accessibility for transit users, bicyclists, and pedestrians. These improvements include:*
  - *Increase bike access*

- *Improve connectivity by increasing intersection density*
- *Increase transit accessibility*
- *Traffic calming measures beyond the project frontage*
- *Pedestrian network improvements beyond the project frontage*

- ***Tier 3:*** *Parking measures that discourage personal motorized vehicle trips. These improvements include:*
  - *Limit parking supply*
  - *Provide bike facilities*

- ***Tier 4:*** *Transportation Demand Management (TDM) measures that provide incentives and services to encourage alternatives to personal motorized vehicle trips. These measures for residential developments include:*
  - *School pool programs*
  - *Bike share programs*
  - *Car share programs*
  - *Subsidized transit program*
  - *Unbundle parking costs from property costs*
  - *Voluntary travel behavior change program*

The first three strategies – land use characteristics, multimodal network improvements, and parking – are physical design strategies that can be incorporated into project design. TDM includes programmatic measures that aim to reduce VMT by decreasing personal motorized vehicle mode share and by encouraging more walking, biking, and riding transit. When required, TDM measures shall be enforced through annual trip monitoring to assess a project's status in meeting the VMT reduction goals.

TRA-1 Vehicle Miles Traveled (VMT) Reduction Mitigation for APN #18956014 and #31801036

The City shall require the following Standard Condition of Approval for projects on APN #18956014 and #31801036:

Prior to issuance of a building permit, the project applicant shall demonstrate VMT reduction using the Santa Clara County VMT Evaluation Tool for implementing Tier 1 through Tier 3 VMT mitigation measures:

- ***Tier 1:*** *Project characteristics that encourage walking, biking, and transit uses.*
- ***Tier 2:*** *Multimodal network improvements that increase accessibility for transit users, bicyclists, and pedestrians. These improvements include:*
  - *Increase bike access*
  - *Improve connectivity by increasing intersection density*
  - *Increase transit accessibility*
  - *Traffic calming measures beyond the project frontage*
  - *Pedestrian network improvements beyond the project frontage*

- ***Tier 3:*** *Parking measures that discourage personal motorized vehicle trips. These improvements include:*
  - *Limit parking supply*
  - *Provide bike facilities*

The City of Los Altos shall review project plans to ensure that the appropriate VMT mitigation measures are implemented prior to project approval.

TRA-2 VMT Reduction Mitigation for APN #31816022, #32601052, #32601053, and #33609018

The City shall require the following Standard Condition of Approval for projects on #31816022, #32601052, #32601053, and #33609018:

Prior to issuance of a building permit, the project applicant shall demonstrate VMT reduction using the Santa Clara County VMT Evaluation Tool for implementing Tier 1 through Tier 4 VMT mitigation measures:

- ***Tier 1:*** *Project characteristics that encourage walking, biking, and transit uses.*
- ***Tier 2:*** *Multimodal network improvements that increase accessibility for transit users, bicyclists, and pedestrians. These improvements include:*
  - *Increase bike access*
  - *Improve connectivity by increasing intersection density*
  - *Increase transit accessibility*
  - *Traffic calming measures beyond the project frontage*
  - *Pedestrian network improvements beyond the project frontage*
- ***Tier 3:*** *Parking measures that discourage personal motorized vehicle trips. These improvements include:*
  - *Limit parking supply*
  - *Provide bike facilities*
- ***Tier 4:*** *Transportation Demand Management (TDM) measures that provide incentives and services to encourage alternatives to personal motorized vehicle trips. These measures for residential developments include:*
  - *School pool programs*
  - *Bike share programs*
  - *Car share programs*
  - *Subsidized transit program*
  - *Unbundle parking costs from property costs*
  - *Voluntary travel behavior change program*

The City of Los Altos shall review project plans to ensure that the appropriate VMT mitigation measures are implemented prior to project approval. TDM measures shall be enforced through annual trip monitoring to assess the project's status in meeting the VMT reduction goals.

Significance After Mitigation

Implementation of mitigation measures TRA-1 and TRA-2 would reduce VMT in "high-VMT" areas to a less than significant level which would ensure consistency with the City's interim VMT policy.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

In the absence of specific project applications to review, analyzing impacts based on project design features would be wholly speculative. CEQA does not require public agencies to speculate. Adoption of the proposed HEU analyzes the amount of new housing units the City will accommodate during the 2023-2031 planning period and sets goals and policies for how this housing is implemented. It does not grant entitlements for any specific project or future development. Thus, the plan for new housing and the goals and policies needed to achieve that housing do not have a specific transportation safety impact or hazard. The proposed project would not include hazardous geometric design features or incompatible uses. Each housing application would be evaluated at the project specific level and undergo design review which would ensure design features would be in accordance with all applicable City standards to minimize design hazards. Furthermore, future projects facilitated would be infill projects or would include increasing density and height of existing sites, and therefore would not involve the creation of new roadways or intersections or incompatible uses within Los Altos. While new intersections of existing local streets with proposed new streets internal to these sites may be created if these sites would be developed, they would be subject to the project-level review processes described above to ensure hazards from design features or incompatible uses are not created. Therefore, impacts from hazardous design features or incompatible uses would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project result in inadequate emergency access?

Adoption of the proposed HEU analyzes the amount of new housing units the City will accommodate during the 2023-2031 planning period and sets goals and policies for how this housing is implemented. It does not grant entitlements for any specific project or future development. Thus, the plan for new housing and the goals and policies needed to achieve that housing do not have a specific emergency access impact. At the project specific level, future development would be required to comply with comply with basic building designs and standards for residential buildings as mandated by the Los Altos Fire Code, under LAMC Chapter 12.24. Future projects would be required to incorporate all applicable design and safety requirements as set forth in the most current adopted building codes and fire and life safety standards. Compliance with these standards is ensured through the City review and building plan check process. Additionally, as discussed under Section 9, *Hazards and Hazardous Materials*, the proposed HEU would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts related to emergency access would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or 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:				
a. 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)?	☐	■	☐	☐
b. 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	■	☐	☐

Regulatory Setting

Assembly Bill 52 of 2014

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. 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
2. 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 these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

California Senate Bill 18 of 2004

California Government Code Section 65352.3 (adopted pursuant to the requirements of Senate Bill [SB] 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005); "The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places." SB 18 refers to PRC Section 5097.9 and 5097.995 to define cultural places as:

- Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9)
- Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historical Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.995).

Consultation Results

As part of its tribal cultural resources consultation process under AB 52 and SB 18, the City of Los Altos sent letters via certified mail on March 9, 2022, to the following ten Native American tribes that that were identified by the NAHC as being traditionally and culturally affiliated with the geographic area:

- Amah Mutsun Tribal Band
- Amah Mutsun Tribal Band of Mission San Juan Bautista
- Indian Canyon Mutsun Band of Costanoan
- Muwekma Ohlone Indian Tribe of the SF Bay Area
- North Valley Yokuts Tribe
- Rumsen Am:a Tur:ataj Ohlone
- Tamien Nation
- The Ohlone Indian Tribe
- Wuksache Indian Tribe/Eshom Valley Band

- The Confederated Villages of Lisjan

Under AB 52 and SB 18, Native American tribes typically have 30 days and 90 days, respectively, to respond and request further project information and formal consultation. To date, the City of Los Altos has not received any responses requesting consultation under AB 52 or SB 18 from the Tribes. Correspondence is included in Appendix E.

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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)?

No specific tribal cultural resources were identified in the City of Los Altos as a result of consultation with the Tribes. Further, the proposed HEU does not involve physical development. Nonetheless, ground-disturbing activities associated with individual development projects during the planning period of the HEU could expose previously unidentified subsurface archaeological resources that may qualify as tribal cultural resources and could be adversely affected by construction.

Adherence to the requirements of AB 52 would require Tribal consultation with local California Native American Tribes prior to implementation of project activities subject to CEQA. AB 168 would require Tribal consultation with local California Native American Tribes prior to implementation of project activities subject to SB 35. In compliance with AB 52, a determination of whether project-specific substantial adverse effects on tribal cultural resources would occur along with identification of appropriate project-specific avoidance, minimization, or mitigation measures would be required. Due to the programmatic nature of the proposed HEU it is not possible to fully determine impacts of specific projects on specific sites; however, no tribal cultural resources were identified during consultation. Future projects subject to CEQA and SB 35 would require project-specific tribal cultural resource identification and consultation, and the appropriate avoidance, minimization, or mitigation would be incorporated. Project-specific tribal cultural resource consultation will occur when specific projects are implemented, and consultation conducted pursuant to the requirements of AB 52.

Nonetheless, tribal cultural resources are common throughout the San Francisco Bay Area, and their locations often are unknown or confidential. Projects associated with the proposed HEU therefore have the potential to significantly impact tribal cultural resources through ground disturbance. Implementation of Mitigation Measure TCR-1 would ensure that any unanticipated discoveries of tribal cultural resources are avoided or, where avoidance is infeasible, mitigated to a less than significant level.

Mitigation Measure

The following mitigation measure is required. Other mitigation may also be required for future projects as determined through the tribal consultation process.

TCR-1 Suspension of Work Around Potential Tribal Cultural Resources

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

In the event that archaeological resources of Native American origin are identified during implementation of the proposed project, all earth-disturbing work within 50 feet of the find shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City of Los Altos, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with local Native American group(s). The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery. The City of Los Altos Community Development Director or designee shall review and approve the plan prior to implementation.

Significance After Mitigation

Implementation of Mitigation Measure TCR-1 would protect tribal cultural resources in the event of their discovery during implementation of the proposed project, reducing the potential impact on such resources to a less-than-significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is 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?

As described under checklist question (a), no specific tribal cultural resources were identified in the City of Los Altos as a result of consultation with the Tribes. Further, no tribal cultural resources have been identified by the lead agency. Nonetheless, tribal cultural resources are common throughout the San Francisco Bay Area, and their locations often are unknown or confidential. Projects associated with the proposed HEU therefore have the potential to significantly impact tribal cultural resources through ground disturbance. Implementation of Mitigation Measure TCR-1 would ensure that any unanticipated discoveries of tribal cultural resources are avoided or, where avoidance is infeasible, mitigated to a less than significant level. This impact would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	■
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	■	☐
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?	☐	☐	■	☐
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?	☐	☐	■	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	■	☐

Environmental Setting

Water

All domestic and commercial water in Los Altos is supplied by Cal Water, and financially supported by user fees. The City of Los Altos is part of Cal Water's Los Altos Suburban District. Cal Water's water supply is derived from purchased surface water from the Santa Clara Valley Water District (SCVWD), groundwater from the Santa Clara Subbasin, and small amounts of recycled water. Treated surface water is delivered to the Los Altos Suburban District from the Rinconada water treatment plant (WTP) through a large-diameter high pressure pipeline that runs through Cupertino and along Foothill Expressway (Cal Water 2021). When surface water supplies are scarce, SCVWD

imposes voluntary and mandatory reductions in the overall use of water. In addition, because surplus surface water supplies are stored underground by SCVWD directly or through in-lieu recharge, during shortages, the Los Altos Suburban District increases groundwater production and reduces its purchases from SCVWD (Cal Water 2021). According to Cal Water's Los Altos Suburban District 2020 UWMP, in the year 2020, Cal Water supplied 10,294 acre-feet (AF) of purchased or imported water from SCVWD, 2,729 AF of groundwater from the Santa Clara Subbasin, and 64 AF of recycled water from the Sunnyvale water pollution control plant (WPCP), for a total of 13,087 AF. The UWMP projects water supply to increase to 13,103 AF by 2030 and 14,197 AF by 2045, and water demand to increase to 13,103 AF by 2030 and 14,197 AF by 2045 (Cal Water 2021).

Wastewater

The City provides sanitary sewer services to most residents within Los Altos, with the exception of a few homes with septic systems. Wastewater is conveyed to the Palo Alto Regional Water Quality Control Plant (RWQCP) for treatment and disposal, which has a dry-weather capacity of 39 million gallons per day (mgd). The City has rights to discharge up to 3.6 million gallons per day average annual dry weather flow to the WPCP. The City owns and maintains the collection system within the City and its sphere of influence which includes approximately 140 miles of sewer pipes of which most is 6-inch and 8-inch vitrified clay pipe. The City's Sanitary Sewer Master Plan Update was prepared in February 2013 to improve hydraulic capacity and reliability of the sewer collection system (City of Los Altos 2013).

Stormwater

The City has adopted a Stormwater Master Plan in April 2016 to establish a capital improvement program to mitigate the impacts of stormwater runoff and reduce flooding impacts. According to the Stormwater Master Plan, the City has five major drainage areas based on the City's pipe network: Hale Creek (17.6 mile pipes), Adobe Creek (18.6 mile pipes), Permanente/Stevens Creek (14.3 mile pipes), Permanente Creek (2.9 mile pipes), and Stevens Creek (1.7 mile pipes) (City of Los Altos 2016). Runoff generated is conveyed through the City owned stormwater system that drains directly to four creeks (Hale, Permanente, Adobe, and Stevens), then to the San Francisco Bay. Portions of the City's watersheds drain directly to creek channels while a portion of the runoff ponds along rural streets. To create a rural aesthetic, many streets in Los Altos do not have traditional suburban curb and gutter, and instead have unpaved areas along the street shoulder. This layout allows some runoff to soak into the ground before it reaches a catch basin and enters a conventional storm drain system.

The City also adopted its Green Stormwater Infrastructure Plan on July 9, 2019, which aims to transform the City's traditional storm drainage infrastructure to green stormwater infrastructure, which uses plants and soils to mimic natural watershed processes, capture stormwater, and create healthier environments (City of Los Altos 2019).

Solid Waste

There are no existing or planned solid waste facilities in the City. Solid waste is collected by Mission Trail Waste Systems, a franchised hauler, which provides residential collection services for trash, recycling, and organics. Solid wastes are transferred to Newby Island landfill in San Jose, which has a remaining capacity of 16,400,000 cubic yards and a maximum permitted capacity of 57,500,000. The estimated cease operation date for the landfill is January 1, 2041 (CalRecycle 2019).

Electricity, Natural Gas, and Telecommunications

SVCE supplies electricity to Los Altos using transmission infrastructure operated and maintained by PG&E. PG&E also provides natural gas to the City. Natural gas and electricity are also addressed in Section 4.5, *Energy*. As the City's main electricity provider, SVCE enrolls new customers in their GreenStart program, which sources 50 percent of electricity from renewable energy sources and 50 percent from carbon-free sources. Customers have the option to upgrade to SVCE's GreenPrime program which sources 100 percent of electricity from renewable energy sources (SVCE 2022).

Telecommunications services in Los Altos are provided by private companies, including AT&T, Comcast Cable, and DISH, which provides internet, phone, and television.

Impact Analysis

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water

Construction activities associated with development under the proposed HEU would require recycled water for dust suppression, concrete manufacturing, and such activities as washing wheels and equipment. Temporary construction recycled water would be trucked to active construction sites or produced from existing fire hydrants near the applicable site(s), with City approval. As such, construction water demands would not require new connections or conveyance facilities, as existing or mobile facilities would be used.

New water supply connections and associated facilities would be required for future development accommodated under the proposed HEU to convey potable water supply. Such upgrades would occur within existing utility easements and would be located underground, primarily within existing roadways. Development under the proposed HEU would primarily be located on previously developed sites or infill sites within the city that are currently zoned for residential development; the HEU would also involve rezoning existing sites to increase allowed density and height. New water service connections would be consistent with utility connections in urbanized areas, such that minimal areas of new disturbance would occur. Developers are responsible for funding infrastructure improvements that are required to serve future projects and have not been previously identified as part of a capital improvement program covered by the development impact fees. Consistent with applicable State law, the City's development fees ensure that the developers pay the cost attributable to the increased demand for the affected public facilities reasonably related to the development project in order to refurbish the existing facilities to maintain the existing level of service and achieve an adopted level of service that is consistent with the City's General Plan (California Government Code Section 66001(g)).

Due to the existing built-up nature of the city, it is reasonably anticipated that future improvements for water supply and fire flow requirements would not disturb previously undisturbed areas and would be situated within existing utility rights-of-way such as, but not limited to, within public roadways. Therefore, the proposed project would not cause significant environmental effects associated with construction or relocation of new water infrastructure. No impact would occur.

The availability and reliability of water supply for the proposed project is addressed below, under checklist question (b). There would be no impacts related to relocation or construction of water supply facilities.

Wastewater

The Palo Alto RWQCP treats and disposes wastewater transported from Los Altos. As discussed below under Impact c, the RWQCP would have sufficient wastewater treatment capacity to accommodate the anticipated residential development, and the proposed HEU would not result in the need to expand the capacity of the RWQCP. Since development facilitated by the proposed HEU would be located in urbanized area served by existing wastewater infrastructure, the project would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction of which could cause significant environmental effects. There would be no impact.

Stormwater

Los Altos is an urbanized city that is currently developed and served by existing stormwater infrastructure. The 2023-2031 Housing Element would facilitate development of residential units within urban infill areas that are already developed or vacant and surrounded by development. Future development would be required to comply with the California Construction General Permit which requires the development and implementation of a SWPPP, the NPDES MRP, the SCVURPPP, and Section 10.16.030 of the LAMC which requires permanent stormwater pollution prevention measures to reduce stormwater pollution. Additionally, future development would be required to adhere to applicable policies within the Infrastructure and Waste Disposal Element of the Los Altos General Plan, such as Policy 3.3, which would require the minimization of impervious surfaces in new development and maximization of on-site infiltration of stormwater runoff; Policy 3.4, which would require the implementation of pollution prevention methods supplemented by pollutant source controls and treatment; and Policy 3.7, which would require the avoidance of development in areas susceptible to erosion and sediment loss. The City would continue to routinely maintain and improve deficiencies in the stormwater system, and developers would be responsible for funding infrastructure improvements that are required to serve future projects and have not been previously identified as part of a capital improvement program covered by the development impact fees. Therefore, the project would not require construction or expansion of stormwater drainage facilities and infrastructure, the construction of which would cause significant environmental effects. No impact would occur.

Telecommunications

Project implementation would require connections to existing adjacent utility infrastructure to meet the needs of site residents and tenants. Based on the availability of existing telecommunications infrastructure, construction of new telephone and cable lines would not be required, and all sites would be able to connect to existing infrastructure. Development facilitated by the project would be required to adhere to applicable laws and regulations related to the connection to existing telecommunication infrastructure. Therefore, there would be adequate telecommunications facilities to serve the development facilitated by the project. The proposed project would not result in the relocation or construction of new or expanded telecommunications facilities, the construction or relocation of which could cause significant environmental effects. There would be no impact.

Electricity and Natural Gas

The project would require connections to existing electrical transmission and distribution systems to serve development facilitated by the project. This service would be provided in accordance with the rules and regulations of SVCE, and PG&E on file with and approved by CPUC. Based on the availability of existing electrical infrastructure, it is not anticipated that the construction of new electrical transmission and distribution lines would be required, and all sites would be able to connect to existing infrastructure. Therefore, there would be adequate electrical facilities to serve development facilitated by the project. The proposed project would not result in the relocation or construction of new or expanded electrical facilities, the construction or relocation of which could cause significant environmental effects. No impact would occur.

Development facilitated by the project would connect to existing natural gas infrastructure to meet the needs of site residents and tenants. Based on the availability of existing natural gas infrastructure, construction of new natural gas pipelines would not be required, and all sites would be able to connect to existing infrastructure. Therefore, there would be adequate natural gas facilities to serve the development facilitated by the project. The proposed project would not result in the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects. No impact would occur.

NO IMPACT

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Los Altos is served by existing Cal Water facilities. According to the 2020 UWMP, Cal Water's Los Altos Suburban District anticipates adequate supply in normal years, single dry years, and multiple dry years (Cal Water 2021). As shown on Table 28, the additional 1,648 units facilitated by the proposed HEU would increase water demand by approximately 107,900 gallons per day or 145.2 acre-feet per year (AFY) in 2031 assuming full buildout. Therefore, overall, the project could increase demand in Los Altos by an approximately 1 percent over Cal Water's estimated 2030 normal-year water demand of 13,103 AFY.

Table 28 Estimated Water Use for the Proposed HEU

Potential Buildout Development/Land Use	Water Generation Factor (gpd/unit) [1]	Projected Number of Housing Units	Projected Water Demand in 2031 (gpd)	Projected Water Demand in 2031 (AFY)
Single-family residential	70	156[2]	10,920	14.7
Multi-family residential	65	1,492[2]	96,980	130.5
Total			**107,900**	**145.2**

[1] Per unit water demand factors from Cal Water are not available, therefore, this analysis is based water use factors provided by the East Bay Municipal Utilities District, 70 gpd/unit for a typical home and 65 gpd/unit for a low-rise apartment.

[2] Assumed 156 single-family residences and the rest multi-family consistent with the assumptions in the traffic analysis (Hexagon Transportation Consultants 2022)

gpd =gallons per day. AFY = acre-feet per year

According to the Cal Water UWMP, the combination of groundwater, recycled water, and purchased imported water supplies are expected to be sufficient to support the Los Altos Suburban District's projected water demands in all hydrologic conditions, including a five-year drought period, through 2045. The project's increase of 1 percent from the projected 2030 water demand in the UWMP would not substantially affect Cal Water's water supplies. Furthermore, future development would be required to comply with water conservation regulations and policies in order to maintain sufficient supplies. The California Code of Regulations (CCR) Title 24, Part 11 (CALGreen) requires a 20 percent reduction in residential indoor water use that would lower potential water demand. New development would be subject to the CCR concerning water-efficient landscapes (Division 2, Title 23, CCR, Chapter 2.7, Sections 490 through 495). Implementation of the WELO would encourage water conservation for new development and in landscaped areas. The WELO, which reinforces landscape irrigation and water conservation best practices also would encourage the use of drought-tolerant landscaping and low-flow irrigation systems. New development would also be subject to other green building and water conservation requirements described in the Water Supply Regulatory Setting. Therefore, sufficient water supplies are available to serve reasonably foreseeable development under the proposed HEU such that potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project 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?

The Palo Alto RWQCP treats and disposes wastewater transported from Los Altos and has a dry-weather capacity of 39 mgd. The City has rights to discharge up to 3.6 mgd average annual dry weather flow to the WPCP. Assuming that wastewater generation is 80 percent of water use[13], the proposed HEU would increase wastewater generation by approximately 86,320 gallons per day. This would constitute approximately 2.4 percent of the City's daily discharge rights and would be within the remaining capacity of the RWQCP. Therefore, the plant's existing wastewater treatment capacity would be sufficient to accommodate the anticipated residential development under the proposed HEU. Development facilitated by the proposed project would not result in the need to expand the capacity of the RWQCP. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project 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?

Projected buildout under the proposed HEU would be 1,648 additional residential units through 2031. CalRecycle estimates that multi-family residential uses generate an average of four pounds of solid waste per unit per day (CalRecycle 2022). As shown in Table 29, prior to implementation of State-mandated diversion requirements, development associated with the proposed HEU would generate an estimated 6,592 pounds per day of solid waste, which equates to 3.3 tons or 29.3 cubic yards per day. In accordance with California's Integrated Waste Management Act of 1989 (AB 939), cities and counties are required to divert 50 percent of all solid wastes from landfills. Additionally, pursuant to AB 341 adopted in 2012, all businesses that generate four cubic yards or more of

[13] 166 GPCD times 0.8 = 132.8 gpd.

commercial solid waste per week including multi-family dwelling that consists of five units or more would be required to divert 75 percent of all solid wastes. The City of Los Altos has achieved a diversion rate of 71 percent, which substantially exceeds AB 939 State requirement (City of Los Altos 2017). Assuming that this diversion rate continues to apply to new development on the project sites, implementation of the project would generate approximately 1 ton or 8.5 cubic yards per day of solid waste for disposal at landfills.

Table 29 Estimated Solid Waste Generation

Potential Buildout Development/ Land Use	Quantity	Units	Generation Rate[1]	Solid Waste (pounds per day)	Solid Waste (tons per day)	Solid Waste (cubic yards per day)[2]
Residential	1,648	dwelling units	4 pounds/ unit/day	6,592	3.3	29.3
Total Assuming 71% Diversion Rate				**1,912**	**1.0**	**8.5**

[1] CalRecycle 2022

[2] RecycleMania/USEPA 2022, assumes 225 pounds per cubic yard of residential waste

As discussed in the Solid Waste Setting, the Newby Island landfill in San Jose is an active landfill that can accommodate solid waste from Los Altos. This landfill has a combined remaining capacity of approximately 16.4 million cubic yards. With development facilitated by the proposed HEU, it is estimated that the project sites would generate approximately 8.5 cubic yards per day, or 3,103 cubic yards per year of solid waste disposal at landfills. This represents 0.0002 percent of the current total remaining landfill capacity.

Continued compliance with applicable regulations and policies 5.2 and 5.4 of the Los Altos General Plan Infrastructure and Waste Disposal Element would ensure that development facilitated by the project complies with federal, State, and local statutes and regulations related to solid waste and would lead to increased recycling and waste diversion. Development facilitated by the project would be required to comply with these policies, including paying a fair share for solid waste services and achieving greater diversion rates than required by AB 939. AB 939 requires the City to divert 50 percent of solid waste from landfills. Local infrastructure would have the capacity to accommodate solid waste generated by the project. Development facilitated by the project would also be required to demonstrate compliance with all applicable regulations. Therefore, anticipated rates of solid waste disposal from the proposed HEU would have a less than significant impact related to solid waste disposal facilities.

LESS THAN SIGNIFICANT IMPACT

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

As discussed under checklist question (d) above, the project would be required to comply with applicable regulations and policies 5.2 and 5.4 of the Los Altos General Plan Infrastructure and Waste Disposal Element, which would ensure that development facilitated by the project complies with federal, State, and local statutes and regulations related to solid waste and would lead to increased recycling and waste diversion. Development facilitated by the project would be required to comply with these policies, including paying a fair share for solid waste services and achieving greater diversion rates than required by AB 939. AB 939 requires the City to divert 50 percent of solid waste from landfills. Local infrastructure would have the capacity to accommodate solid waste generated by the project. Additionally, future development would be required to comply with SB

1838 which would require mandatory organic waste recycling. Therefore, the project would comply with federal, State, and local regulations related to solid wastes, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

20 Wildfire

	Potentially Significant Impact	Less than Significant 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:				
a. Substantially impair an adopted emergency response plan or emergency evacuation 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 downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	■

Environmental Setting

According to maps prepared by the California Department of Forestry and Fire Protection (CAL FIRE), Los Altos is not located in a state responsibility area (SRA) or local responsibility area (LRA) fire hazard severity zones (FHSZs) (CAL FIRE 2007). A small portion of the southwestern border is adjacent to a high fire hazard severity zone (HFHSZ), and the closest very high fire hazard severity zone is located approximately 1 mile southwest of the city.

Impact Analysis

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Los Altos is not located in or immediately adjacent to a VHFHSZ, with the closest VHFHSZ located approximately 1 mile southwest and separated by existing structures and natural landscape. The City of Los Altos is mainly urbanized with most natural vegetation isolated in small areas; therefore, wildfire hazards are not a major concern in the city. Future development facilitated under the proposed HEU would be required to be constructed in accordance with the City's Fire Code pursuant to Chapter 12.24 of the LAMC. Additionally, Program OCC 10 of the Los Altos General Plan's Open Space Element aims to promote fire prevention through fire hazard education and fire prevention program, and coordination with local water districts to ensure water pressure for new development is adequate for firefighting purposes. The City's Emergency Preparedness Plan and evacuation routes would also prepare future residents for emergencies and reduce impacts from wildfire to a less than significant level. Additionally, the proposed HEU would facilitate residential development primarily on infill sites, and would not require the construction of additional roads, power lines, or other utilities that would exacerbate existing fire risk. Housing sites that require utility connections would likely install underground connections, and development within underground utility districts would be required to install new utility connections underground. Therefore, the proposed HEU would not substantially impair an adopted emergency response plan or emergency evacuation plan and there would be no impact.

NO IMPACT

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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?

For the same reasons outlined above under checklist question (a), with compliance with existing regulations, development that could be facilitated by the proposed HEU would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. There would be no impact.

NO IMPACT

c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?

Development that could be facilitated by the proposed HEU would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. For the same reasons outlined above under checklist question (a), with compliance with existing regulations, there would be no impact.

NO IMPACT

d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

For the same reasons outlined above under checklist question (a), with compliance with existing regulations, the project would not increase the risk of flooding or landslides, as site topography and designated flood zones would not be modified substantially from existing conditions. There would be no impact.

NO IMPACT

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21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. 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. 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)?	☐	■	☐	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	■	☐	☐

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?

Construction activities associated with development facilitated by the proposed HEU could potentially degrade the quality of the environment, eliminate or threaten wildlife habitats, or eliminate important examples of the major periods of California history or prehistory. However, compliance with federal, State, and local regulatory requirements; Los Altos General Plan policies; and LAMC requirements would reduce impacts to status species, cultural resources, and tribal cultural resources. Additionally, as discussed in Sections 4, *Biological Resources*, 5, *Cultural Resources*, 7, *Geology and Soils*, and 18, *Tribal Cultural Resources,* implementation of mitigation

measures BIO-1 though BIO-5, CUL-1, CUL-2, GEO-1, and TCR-1 would ensure protection of special-status species, nesting birds, roosting bats, and State and federally protected waters and wetlands, as well as historical, paleontological, and tribal resources, and would reduce impacts to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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)?

CEQA defines "cumulative impacts" as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, noise impacts of two nearby projects may be less than significant when analyzed separately but could have a significant impact when analyzed together. Cumulative impact analysis provides a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

This analysis is cumulative in nature in that it analyzes future development under the proposed HEU throughout Los Altos and takes into consideration the effects associated with development of multiple projects in the housing element cycle through 2031. For analyses that may have more localized or neighborhood implications (aesthetics, agriculture, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public services, recreation, utilities, tribal cultural resources, wildfire), the geographic scope for cumulative impacts includes the City of Los Altos. For these issue areas, generally, impacts are site specific and would not result in overall cumulative impacts. Future development projects would be reviewed by the City pursuant to CEQA to identify potential impacts to on a project-by-project basis. While there is the potential for significant cumulative impacts, it is anticipated that potential impacts associated with individual development projects would be addressed on a case-by-case basis and would be subject to the mitigation measures outlined in this IS-MND, City policies, and local and State regulations regarding the protection of such resources. With compliance with the existing policies and regulations, and mitigation measures, future development would be required to avoid or mitigate impacts. Therefore, the proposed project's incremental contribution to cumulative impacts associated with aesthetics, agriculture, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public services, recreation, utilities, tribal cultural resources, wildfire would not be cumulatively considerable, and cumulative impacts would be less than significant.

Some analyses including air quality, energy, greenhouse gas emissions, transportation, and population and housing, rely on much larger geographic areas such as the Bay Area region. For issues that may have regional cumulative implications, the cumulative impact analysis for this EIR is based on Plan Bay Area 2050, the Bay Area's most recent Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

As discussed in sections 3, *Air Quality,* the project would be consistent with the 2017 Clean Air Plan control measures as development facilitated by the project would comply with the latest Title 24 regulations and would increase density in urban areas in proximity to transit, allowing for greater use of alternative modes of transportation. Additionally, the increase in VMT would not exceed the

projected population increase per the BAAQMD *CEQA Air Quality Guidelines* for operational emissions from plans. Discussion of these impacts considers the cumulative nature of criteria pollutants in the region. Therefore, the project would not result in a cumulatively considerable contribution to an air quality impact.

As discussed in Section 6, *Energy,* development facilitated by the project would not result in a wasteful, inefficient, or unnecessary consumption of energy, and operation of the new residential structures would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. Development facilitated by the project would be consistent with the energy-related goals, policies, and actions of the Statewide plans and the City's General Plan; therefore, the project would not make a cumulatively considerable contribution to a significant cumulative impact with respect to consistency with renewable energy and energy efficiency plans. Projects throughout the Bay Area are required to adhere to applicable renewable energy and energy efficiency laws, programs, and policies such as California's RPS, AB 2076, and Title 24 standards to avoid the wasteful, inefficient, or unnecessary consumption of energy.

As discussed in Section 8, *Greenhouse Gas Emissions,* the impact of GHG emissions generated by development facilitated by the proposed HEU is inherently cumulative. GHG emissions from one project cannot, on their own, result in changes in climatic conditions; therefore, the emissions from any project must be considered in the context of their contribution to cumulative global emissions, which is the basis for determining a significant cumulative impact. This is determined through the project's consistency with applicable GHG emission thresholds and applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. GHG emissions from development facilitated by the project would not exceed the BAAQMD interpolated 2031 plan-level threshold. In addition, development facilitated by the project would be consistent with the 2017 Scoping Plan, Plan Bay Area 2050, City General Plan, and the City CAP. Therefore, the project would not result in a significant cumulative impact related to GHG emissions.

As discussed in Section 14, *Population and Housing,* the proposed HEU would result in an housing increase in Los Altos of approximately 14 percent. The proposed project would be consistent with State requirements for the RHNA and would be within the growth forecasts for Northwest Santa Clara County in Plan Bay Area 2050, which projects a 38 percent increase in housing for Northwest Santa Clara County. Therefore, the project would not result in a cumulatively considerable contribution to a GHG impact.

As discussed in Section 17, *Transportation,* and shown in Table 27, the proposed HEU would not result in a significant cumulative VMT impact. Therefore, the project would not result in a cumulatively considerable contribution to a transportation impact.

Therefore, with implementation of mitigation measures included in this IS-MND, impacts of the proposed HEU would not be cumulatively considerable.

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

In general, impacts to human beings are associated with air quality, geologic hazards, GHGs, hazards and hazardous materials, noise, and traffic safety impacts. As discussed in this IS-MND, impacts related to the above-mentioned areas would all be less than significant or less than significant with incorporation of mitigation measures AQ-1 through AQ-3, NOI-1, and NOI-2. Therefore, the proposed project would not directly or indirectly cause substantial adverse effects on human beings, and impacts would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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Appendix A

Vehicle Miles Traveled (VMT) Analysis Memorandum

Hexagon Transportation Consultants, Inc.

Memorandum

Date: November 11, 2022

To: Ms. Jennifer Murillo, Lisa Wise Consulting

From: Shikha Jain, Gary Black

Subject: Los Altos Housing Element Update Transportation Study

Hexagon Transportation Consultants, Inc. has completed a transportation study for the proposed Los Altos Housing Element Update (HEU) project. The purpose of this study is to conduct a vehicle-miles travelled (VMT) analysis consistent with CEQA guidelines to determine whether the proposed HEU project would generate a VMT impact. The HEU has identified 1,648 dwelling units distributed in parcels across the City (see Figure 1).

Background

SB 743, which was signed into law in 2013, initiated a change in how public agencies evaluate transportation impacts under the California Environmental Quality Act (CEQA). Traditionally, transportation impacts have been evaluated by examining whether the project is likely to cause automobile delay at intersections and congestion on nearby individual highway segments, and whether this delay will exceed local or regionally-defined thresholds of significance (this is known as Level of Service or LOS analysis).

Starting on July 1, 2020, agencies must analyze transportation impacts using a new metric known as vehicle miles traveled (VMT) instead of LOS. VMT is a metric that captures how much auto travel (additional miles driven) a proposed project would create on California roads. If the project adds excessive car travel onto our roads, the project may cause a significant transportation impact.

VMT Analysis Methodology and Criteria

VMT is the total miles of travel by personal motorized vehicles a project is expected to generate in a day. VMT is calculated using the Origin-Destination VMT method, which measures the full distance of personal motorized vehicle-trips with one end within the project. A project's VMT is compared to established thresholds of significance based on the project location and type of development.

Typically, development projects that are farther from other, complementary land uses (such as a business park far from housing) and in areas without transit or active transportation infrastructure (bike lanes, sidewalks, etc.) generate more driving than development near complementary land uses with more robust transportation options. Therefore, developments located in a central business district with high density and diversity of complementary land uses and frequent transit services are expected to internalize trips and generate shorter and fewer vehicle trips than developments located in a suburban area with low density of residential developments and no transit serve in the project vicinity.

When assessing a residential project, the project's VMT is divided by the number of residents expected to occupy the project to determine the VMT per capita.

VMT Evaluation

Given that the City of Los Altos has not formally adopted a local VMT policy, the HEU has been analyzed according to the City's interim VMT policy. The Interim VMT Policy sets a threshold of significance for residential VMT per capita at 15 percent below the regional average of 13.95 VMT per capita. Therefore, the threshold is 11.86 daily VMT per capita. Any project above the threshold would need to mitigate its impacts to less than significant.

To determine whether a project would result in CEQA transportation impacts related to VMT, the Santa Clara Valley Transportation Authority (VTA) travel demand forecasting (TDF) model was used. VTA also has developed the Santa Clara County map-based VMT Evaluation Tool, based on the model forecasts, to streamline the analysis for development projects located within the County. The TDF model and the map based VMT evaluation tool were used to estimate VMT for the proposed housing sites and determine whether the location of the housing sites would result in significant VMT impacts.

In addition to the location based VMT evaluation methodology using the County VMT Evaluation Tool, HEU sites that generate or attract fewer than 110 trips per day are considered as small projects and would be screened out from further VMT analysis per the Office of Planning and Research (OPR) guidelines.

Figure 1 shows the current VMT levels estimated by VTA's TDF model for residents in Los Altos and the location of the proposed housing sites. Areas are color-coded based on the level of existing VMT:

- Green-filled areas are parcels with existing VMT less than the City's residential threshold of 11.86 VMT per capita. HEU sites (954 units) that are located in these areas are assumed to have a **less-than-significant** VMT impact.
- Yellow-filled areas are parcels with existing VMT between the residential threshold and the regional average of 13.95 VMT per capita. HEU sites (388 units) that are located in these areas are assumed to have a **potentially significant** VMT impact. However, the VMT impact can be mitigated by implementing VMT-reducing measures.
- Orange-filled areas are parcels with existing VMT greater than the regional average. HEU sites (292 units) that are located in these areas are assumed to have a **potentially significant** VMT impact. However, the VMT impact can be mitigated by implementing VMT-reducing measures.
- Red-filled areas (14 units) are parcels with existing VMT greater than the residential thresholds. HEU sites that are located in these areas are assumed to have a significant VMT impact. However, the potential HEU developments identified in these areas all propose single family or multifamily developments that would generate fewer than 110 daily vehicle trips. Per OPR guidelines, these HEU sites would be screened out from further VMT analysis and would be presumed to have a **less-than-significant** VMT impact.

VMT Mitigation

Projects located in areas where the existing VMT is above the established threshold are referred to as being in "high-VMT areas". Projects in high-VMT areas are required to include a set of VMT reduction measures that would reduce the project VMT to the greatest extent possible. The evaluation tool evaluates a list of selected VMT reduction measures that can be applied to a project to reduce the project VMT. There are four strategy tiers whose effects on VMT can be calculated with the VMT evaluation tool:

1. Tier 1: Project characteristics (e.g. density, diversity of uses, design, and affordability of housing) that encourage walking, biking and transit uses;

2. Tier 2: Multimodal network improvements that increase accessibility for transit users, bicyclists, and pedestrians. These improvements include:
    - Increase bike access
    - Improve connectivity by increasing intersection density
    - Increase transit accessibility
    - Traffic calming measures beyond the project frontage
    - Pedestrian network improvements beyond the project frontage
3. Tier 3: Parking measures that discourage personal motorized vehicle-trips. These improvements include:
    - Limit parking supply
    - Provide bike facilities
4. Tier 4: Transportation demand management (TDM) measures that provide incentives and services to encourage alternatives to personal motorized vehicle-trips. These measures for residential developments include:
    - School pool programs
    - Bike share programs
    - Car share programs
    - Subsidized transit program
    - Unbundle parking costs from property costs
    - Voluntary travel behavior change program

The first three strategies – land use characteristics, multimodal network improvements, and parking – are physical design strategies that can be incorporated into the project design. TDM includes programmatic measures that aim to reduce VMT by decreasing personal motorized vehicle mode share and by encouraging more walking, biking, and riding transit. TDM measures should be enforced through annual trip monitoring to assess the project's status in meeting the VMT reduction goals.

VMT of HEU Sites in Yellow Areas (higher than the Residential Threshold but below the Regional Average)

The HEU proposes 388 units located in these areas. Most potential developments would generate fewer than 110 daily vehicle trips. Per OPR guidelines, these HEU sites would be screened out from further VMT analysis and would be presumed to have a less than significant VMT impact. Two parcels (APN#18956014, APN#31801036) would not be screened out from the VMT analysis and would need to implement Tier 1-3 mitigation measures for the VMT impact to be **less-than-significant.**

VMT of HEU Sites in Orange Areas (higher than the Regional Average, but Mitigatable)

The HEU proposes 292 units located in these areas. Some potential developments would generate fewer than 110 daily vehicle trips and would be screened out from further VMT analysis. Four parcels (APN#31816022, APN#32601052, APN#32601053, APN#33609018) would not be screened out from VMT analysis and would need to implement Tier 1-4 mitigation measures for the VMT impact to be **less-than-significant.**

Since there are no specific development projects associated with the HEU, specific housing sites developed under the HEU cannot be analyzed for VMT mitigation measures at this time. See Appendix A for example VMT reductions for a parcel located in yellow areas and a parcel located in orange areas.

The City requires that driveway trips for projects located in the yellow and above tiers be monitored with automatic driveway count equipment. The counts would automatically be uploaded to a City account for continuous monitoring, and VMT assumptions would be compared against actual

conditions as projects come online. The City will identify the driveway count technology as part of project approvals.

Cumulative VMT Analysis

A cumulative analysis that calculates the change in citywide VMT as a result of the housing element was conducted. VMT forecasts were developed using the VTA Travel Demand Forecasting Model. Two future land use scenarios were evaluated: Cumulative (2040) No Project Conditions and Cumulative (2040) Conditions with the HEU. The Cumulative (2040) No Project scenario includes local and regional roadway improvements and land use projections consistent with ABAG Projections 2017 in the rest of the region but assumes no growth in housing units in Los Altos. The Cumulative (2040) conditions with the HEU assumes the addition of 1,648 residential units to the City's housing inventory. Table 1 presents the results of the VMT analysis. The table shows that the VMT per resident would decrease by 0.17, from 13.08 under cumulative (2040) no project conditions to 12.90 with the HEU.

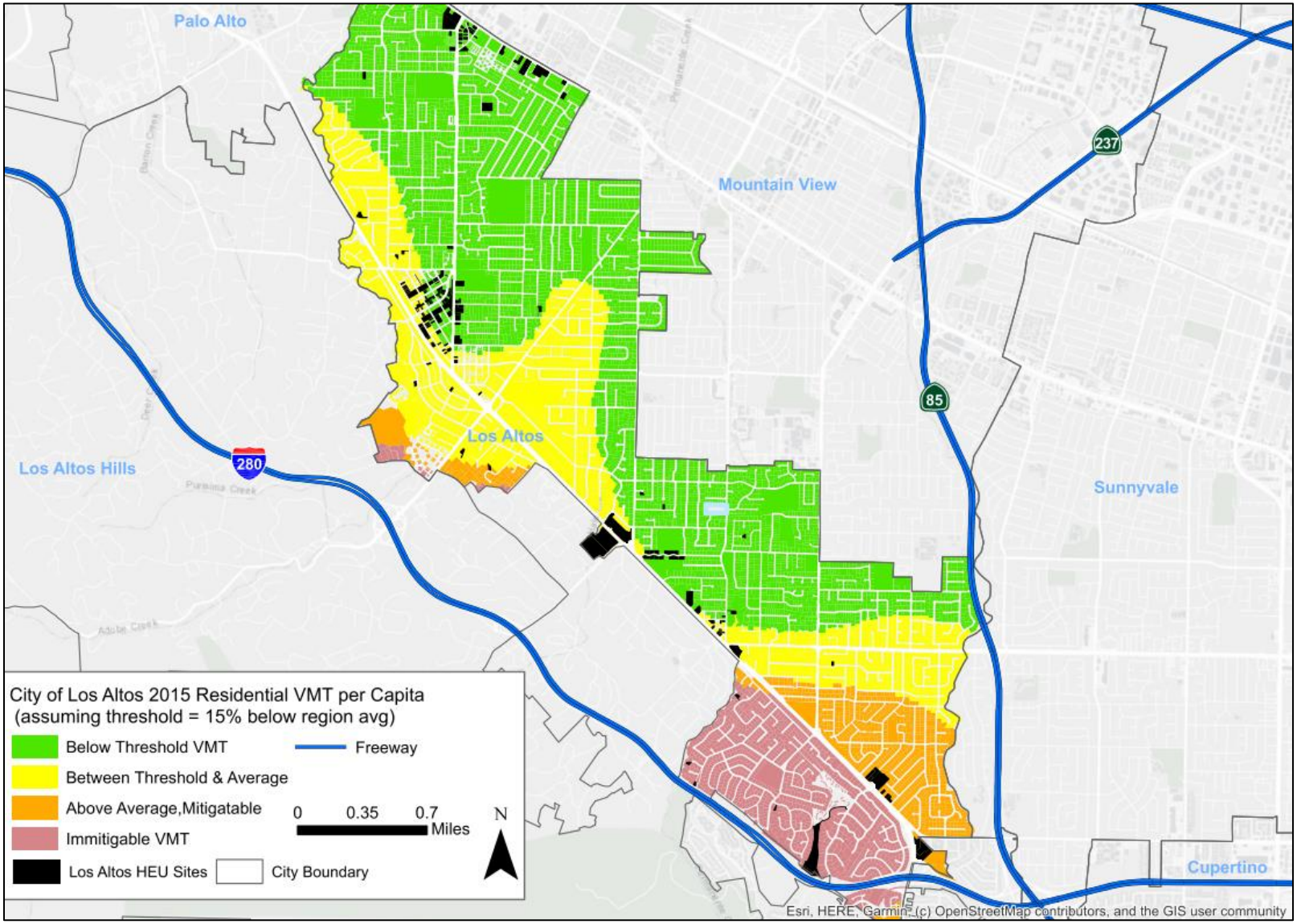
Since the HEU buildout year is 2031, the VMT forecasts for the cumulative (2031) no project and cumulative (2031) with HEU scenarios were extrapolated using the existing and cumulative 2040 VMT forecasts from the VTA model. As shown in Table 1, the VMT per resident under cumulative (2031) with HEU would decrease by 0.14, from 12.85 under cumulative (2031) no project conditions to 12.71 with the HEU resulting in a **less-than-significant** VMT impact.

Table 1
Los Altos Cumulative VMT Analysis

Scenario	Residential VMT [1]	Housing Units	Population	VMT per Resident [2]
Cumulative (2031) No Project	415,472	11,847	32,322	12.85
Cumulative (2040) No Project	424,782	11,905	32,478	13.08
Cumulative (2031) Plus HEU	467,012	13,495	36,756	12.71
Cumulative (2040) Plus HEU	476,322	13,553	36,912	12.90

[1] Residential VMT = Daily Home-Based Vehicle Trips * Travel Distance
[2] VMT per Resident = Residential VMT / Population

Figure 1
Los Altos HEU Sites and VMT Heat Map



APPENDIX A

VMT Screening Reports

Santa Clara Countywide VMT Evaluation Tool - Version 2 - Report

Project Details

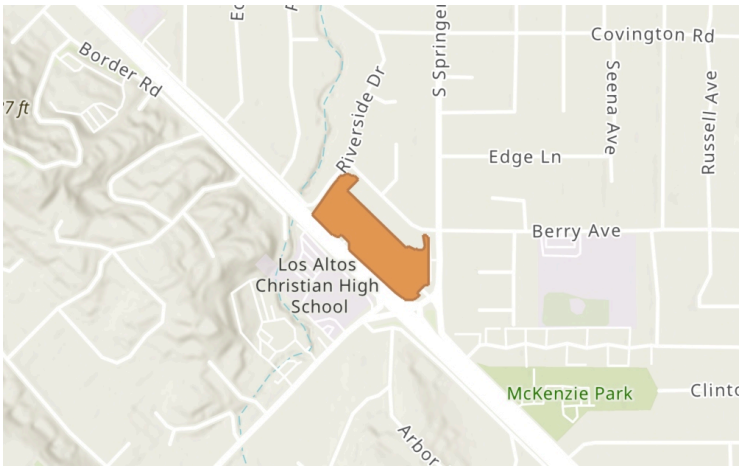
Timestamp of Analysis	November 16, 2022, 12:37:14 PM
Project Name	Los Altos HEU
Project Description	Housing in Yellow Area

Project Location Map

Jurisdiction:

Los Altos

APN	TAZ
18956014	214



Analysis Details

Data Version	VTA Countywide Model December 2019
Analysis Methodology	Parcel Buffer Method
Baseline Year	2015

Project Land Use

Residential:

Single Family DU:	
Multifamily DU:	82
Total DUs:	82

Non-Residential:

Office KSF:

Local Serving Retail KSF:

Industrial KSF:

Residential Affordability (percent of all units):

Extremely Low Income:	0 %
Very Low Income:	0 %
Low Income:	25 %

Parking:

Motor Vehicle Parking:

Bicycle Parking:

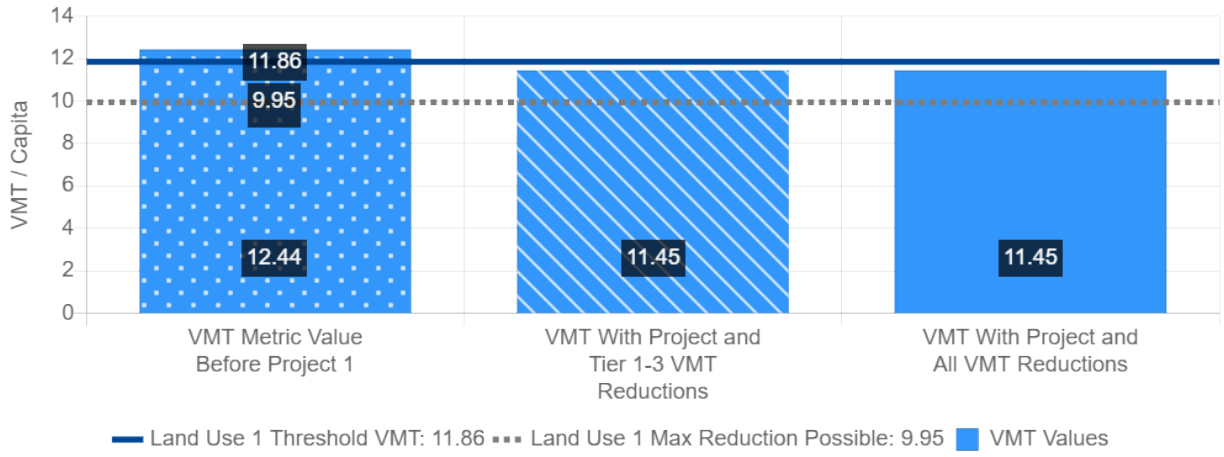
Proximity to Transit Screening

Inside a transit priority area? No (Fail)

Residential Vehicle Miles Traveled (VMT) Screening Results

Land Use Type 1:	Residential
VMT Metric 1:	Home-based VMT per Capita
VMT Baseline Description 1:	Bay Area Regional Average
VMT Baseline Value 1:	13.95
VMT Threshold Description 1 / Threshold Value 1:	-15% / 11.86
Land Use 1 has been Pre-Screened by the Local Jurisdiction:	N/A

	Without Project	With Project & Tier 1-3 VMT Reductions	With Project & All VMT Reductions
Project Generated Vehicle Miles Traveled (VMT) Rate	12.44	11.45	11.45
Low VMT Screening Analysis	No (Fail)	Yes (Pass)	Yes (Pass)



Tier 1 Project Characteristics

PC01 Increase Residential Density

Existing Residential Density:	2.87
With Project Residential Density:	3.13

PC02 Increase Residential Diversity

Existing Residential Diversity Index:	0.67
With Project Residential Diversity Index:	0.65

PC03 Affordable Housing

Low Income:	25 %

PC04 Increase Employment Density

Existing Employment Density:	28.03
With Project Employment Density:	28.03

Tier 2 Multimodal Infrastructure

MI01 Increase Bike Access

Distance to Nearest Existing Bike Facility:	ft

MI02 Improve Connectivity

MI03 Increase Transit Accessibility

MI04 Traffic Calming

Traffic Calming Added Beyond Development Frontage:	Yes

MI05 Pedestrian Networks

Pedestrian Improvements Beyond Development Frontage:	Yes

Tier 3 Parking

PK01 Limit Parking Supply

Minimum Parking Required by City Code:	82
Is the Surrounding Street Parking Restricted?:	

PK02 Provide Bike Facilities

Project End-of-trip Bike Facilities:	Yes

Project Details

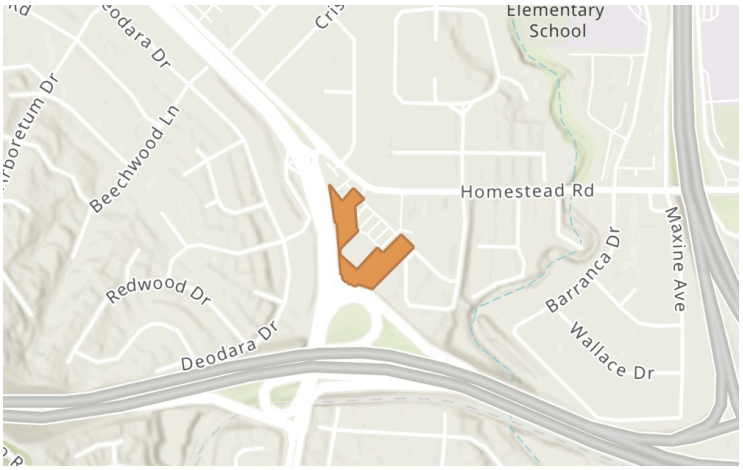
Timestamp of Analysis	November 16, 2022, 12:52:57 PM
Project Name	Los Altos HEU
Project Description	Housing in Orange Area

Project Location Map

Jurisdiction:

Los Altos

APN	TAZ
32601053	204



Analysis Details

Data Version	VTA Countywide Model December 2019
Analysis Methodology	Parcel Buffer Method
Baseline Year	2015

Project Land Use

Residential:

Single Family DU:	
Multifamily DU:	80
Total DUs:	80

Non-Residential:

Office KSF:

Local Serving Retail KSF:

Industrial KSF:

Residential Affordability (percent of all units):

Extremely Low Income:	0 %
Very Low Income:	0 %
Low Income:	50 %

Parking:

Motor Vehicle Parking:

Bicycle Parking:

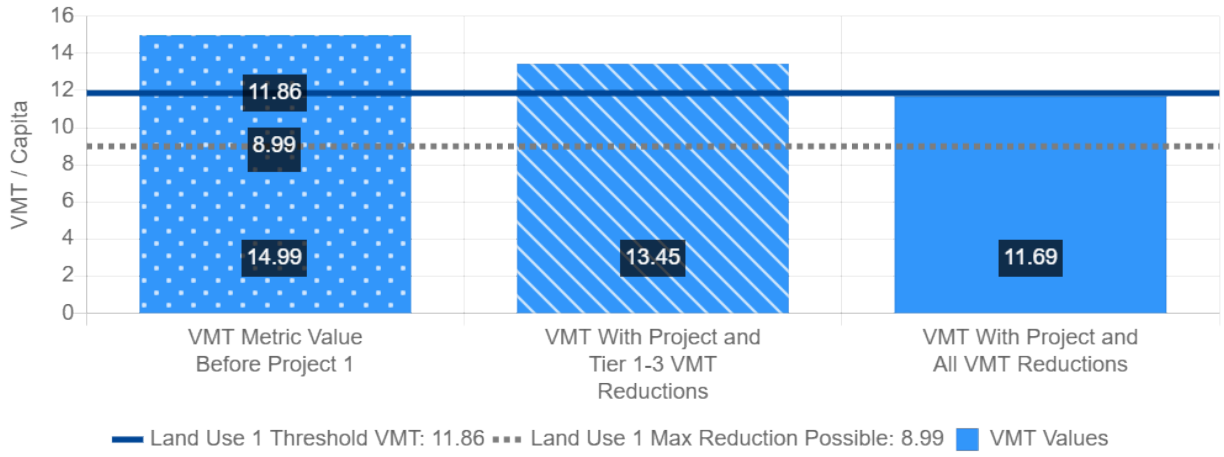
Proximity to Transit Screening

Inside a transit priority area? No (Fail)

Residential Vehicle Miles Traveled (VMT) Screening Results

Land Use Type 1:	Residential
VMT Metric 1:	Home-based VMT per Capita
VMT Baseline Description 1:	Bay Area Regional Average
VMT Baseline Value 1:	13.95
VMT Threshold Description 1 / Threshold Value 1:	-15% / 11.86
Land Use 1 has been Pre-Screened by the Local Jurisdiction:	N/A

	Without Project	With Project & Tier 1-3 VMT Reductions	With Project & All VMT Reductions
Project Generated Vehicle Miles Traveled (VMT) Rate	14.99	13.45	11.69
Low VMT Screening Analysis	No (Fail)	No (Fail)	Yes (Pass)



Tier 1 Project Characteristics

PC01 Increase Residential Density

Existing Residential Density:	4.56
With Project Residential Density:	4.83

PC02 Increase Residential Diversity

Existing Residential Diversity Index:	0.36
With Project Residential Diversity Index:	0.34

PC03 Affordable Housing

Low Income:	50 %

PC04 Increase Employment Density

Existing Employment Density:	31.95
With Project Employment Density:	31.95

Tier 2 Multimodal Infrastructure

MI01 Increase Bike Access

Distance to Nearest Existing Bike Facility With Project:	50 ft

MI04 Traffic Calming

Traffic Calming Added Beyond Development Frontage:	Yes

MI05 Pedestrian Networks

Pedestrian Improvements Beyond Development Frontage:	Yes

Tier 3 Parking

PK01 Limit Parking Supply

Minimum Parking Required by City Code:	80
Is the Surrounding Street Parking Restricted?:	

PK02 Provide Bike Facilities

Project End-of-trip Bike Facilities:	Yes

Tier 4 TDM Programs

TP01 School Pool Programs

School Pool Program Percent of Expected Participant Households:	100 %

TP03 Car Share Programs

Car Share Program Percent of Eligible Residents/Employees:	100 %

TP07 Subsidized Transit Program

Percent of Transit Subsidy:	100 %

TP12 Neighborhood Schools

Type of School Served By the Project:	Neighborhood School
Families With School-Aged Children in the Project:	20 Families

TP13 Ride-Sharing Programs

Expected Percent of Ride-Sharing Participants:	10 %

TP16 Unbundle Parking Costs from Property Cost (On Site Parking)

Is the Surrounding Street Parking Restricted?:	
Monthly Parking Cost:	100 $USD

TP18 Voluntary Travel Behavior Change Program

Percent of Behavior Program Participants :	100 %

Appendix B

Age-Eligible Housing Inventory Sites

Table B-1 Age-Eligible Housing Inventory Sites

Address	APN	Date Of Construction	5th Cycle Site
B Street	18915088	1900	No
El Camino Real	17003084	Circa 1968	Yes
N San Antonio Road (Near 1067)	17001035	Circa 1968	No
1000 Fremont Avenue	31801036	1960	No
1005 Acacia Avenue	17001045	1940	Yes
1031 N San Antonio Road	17001032	1946	No
1188 Los Altos Avenue	16710094	1956	No
1276 Montclaire Wy	34209045	1900	No
133 Main Street	16738013	1955	No
139 1street Street	16739043	1949	No
141 Main Street	16738012	1952	No
145 1street Street	16739041	1950	No
146 Main Street	16738020	Circa 1948	No
147 Main Street	16738011	1954	No
151 1street Street	16739040	1974	No
151 Main Street	16738010	1954	No
1530 Miramonte Avenue	18915042	1947	No
1534 Carob Lane	18915038	1950	No
1564 Miramonte Avenue	18915090	1954	No
160 Main Street	16738021	1955	No
168 Main Street	16738024	1957	No
169 Main Street	16738008	1952	No
179 Main Street	16738052	1952	No
189 Main Street	16738053	1960	No
195 S San Antonio Road	17041068	1977	No
2050 Longden Cl	34210088	1900	No
2057 Grant Road	31816020	1959	No
2073 Grant Road	31816015	1959	No
2100 Woods Lane	34204089	1971	No
22310 Homestead Road	32601053	1973	No
2235 Grant Road	31816011	1961	No
22350 Homestead Road	32601052	1969	No
2249 Grant Road	31816009	1962	No
2251 Grant Road	31816008	1975	No
241 S San Antonio Road	17041065	1953	No

Address	APN	Date Of Construction	5th Cycle Site
242 State Street	16739011	1960	No
244 State Street	16739012	1920	No
248 Main Street	16739074	1948	No
252 Main Street	16739075	1951	No
252 State Street	16739097	1939	No
262 Main Street	16739076	1950	No
275 3road Street	16738065	1977	No
285 State Street	16739064	1953	No
289 S San Antonio Road	17041086	1977	No
290 Main Street	16739105	1940	No
301 2nd Street	16740056	1963	No
301 S San Antonio Road	17040072	1972	No
309 1street Street	16740052	1924	No
317 1street Street	16740051	1962	No
32 Loucks Avenue	16716018	1900	Yes
325 1street Street	16740050	1954	No
330 2nd Street	16741046	1964	No
334 Main Street	16739084	1959	No
342 1street Street	16741003	1966	No
346 Main Street	16739085	1910	No
351 Main Street	16740004	1925	No
355 State Street	16739060	1962	No
357 Main Street	16740003	1936	No
366 1street Street	16741051	1955	No
369 S San Antonio Road	17040062	1973	No
380 Main Street	16739089	1950	No
392 1st Street	16741007	1958	No
395 1st Street	16741022	1954	No
399 1st street	16741021	1951	No
399 S San Antonio Road	17040082	Circa 1956	No
416 2nd Street	16741072	1950	No
435 1street Street	16741018	1946	No
4500 El Camino Real	16712045	1976	No
4500 El Camino Real	16712045	1976	No
4546 El Camino Real	16712042	1964	Yes
4546 X El Camino Real	16712047	1964	Yes

Address	APN	Date Of Construction	5th Cycle Site
4546 X El Camino Real	16712047	1964	Yes
4598 El Camino Real	17001036	1960	No
4646 El Camino Real	17001088	1958	No
475 S San Antonio Road	17039053	1973	No
4926 El Camino Real	17003073	1968	No
495 S San Antonio Road	17039058	1970	No
5000 El Camino Real	17004050	1974	Yes
5084 El Camino Real	17004065	1950	No
60 Main Street	16738057	1963	No
600 Foothill Ex	18956014	1900	No
625 Magdalena Avenue	33609018	Circa 1968	No
655 Magdalena Avenue	33609023	Circa 1960	No
718 Ronald Ct	18919003	Circa 1956	No
730 Altos Oaks Dr	18916003	1958	No
731 Altos Oaks Dr	18916018	1957	No
745 Distel Dr	17004045	1963	No
746 Altos Oaks Dr	18916004	1959	No
747 Altos Oaks Dr	18916017	1960	No
762 Altos Oaks Dr	18916005	1959	No
763 Altos Oaks Dr	18916016	1962	No
775 Edge Lane	18918102	1938	No
778 Altos Oaks Dr	18916006	1957	No
795 Altos Oaks Dr	18916014	1960	No
802 Altos Oaks Dr	18916008	1958	No
811 Altos Oaks Dr	18916013	1961	No
826 Altos Oaks Dr	18916009	1958	No
827 Altos Oaks Dr	18916012	1960	No
842 Altos Oaks Dr	18916010	1957	No
851 Fremont Avenue	18914081	1970	No
895 Sherwood Avenue	17001055	1973	No
900 N San Antonio Road	16716022	1900	No
901 Fremont Avenue	18915106	1961	No
905 N San Antonio Road	17001023	1955	No
915 N San Antonio Road	17001025	1930	No
925 N San Antonio Road	17001026	1961	No
942 Acacia Avenue	17001051	1950	Yes

Address	APN	Date Of Construction	5th Cycle Site
948 Dolores Avenue	18915103	1950	No
949 Fremont Avenue	18915063	1953	No
952 Acacia Avenue	17001049	1947	Yes
971 N San Antonio Road	17001027	1953	No
979 Fremont Avenue	18915059	1956	No
981 Fremont Avenue	18915102	1945	No
982 Dolores Avenue	18915041	1950	No
987 Acacia Avenue	17001043	1945	Yes
988 Sherwood Avenue	17001042	1900	Yes
991 N San Antonio Road	17001029	1942	No
994 Acacia Avenue	17001047	1924	Yes
994 Sherwood Avenue	17001086	1900	Yes

Table B- 2 Housing Inventory Sites that Will Become Age-Eligible

Address	APN	Date Of Construction	5th Cycle Site
101 1st Street	16739127	1980	No
701 Catalina Way	17012042	Circa 1980	No
4844 El Camino Real	17002023	Circa 1980	Yes
4906 El Camino Real	17003077	1984	No
4970 El Camino Real	17064120	1985	No
4988 El Camino Real	17064119	1981	No
4988 El Camino Real	17064119	1981	No
129 Fremont Avenue	17038062	1978	Yes
40 Hawthorne Avenue	17041014	1978	No
170 Main Street	16738025	Circa 1980	No
161 S San Antonio Road	17042028	1979	No
211 S San Antonio Road	17041079	Circa 1980	No

Appendix C

Greenhouse Gas Modeling Results

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Los Altos HE - GHG

Bay Area AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Single Family Housing	156.00	Dwelling Unit	50.65	280,800.00	446
Apartments Low Rise	1,027.00	Dwelling Unit	64.19	1,027,000.00	2805
Apartments Mid Rise	465.00	Dwelling Unit	12.24	465,000.00	1330

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	64
Climate Zone	4			**Operational Year**	2031
Utility Company	Silicon Valley Clean Energy				
CO2 Intensity (lb/MWhr)	2	**CH4 Intensity (lb/MWhr)**	0	**N2O Intensity (lb/MWhr)**	0

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - IS-MND envisions growth of 156 single family units, 1,027 low rise units, and 465 mid rise units. Population adjusted to match Pop and Housing estimate of 4,581 new residents.

Construction Phase - Operational model, no construction

Off-road Equipment - Operational model, no construction

Vehicle Trips - Default trip generation rates used

Woodstoves - BAAQMD Regulation 6 Rule 3, no woodburning devices. All-electric appliances pursuant to City's Reach Code.

Area Coating - BAAQMD Regulation 8 Rule 3, Nonflat coating

Energy Use - City's all-electric ordinance pursuant to Reach Code

Water And Wastewater - Palo Alto Regional Water Quality Control Plant 100% aerobic

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Area Mitigation -

Energy Mitigation - Pursuant to Section 150.1(c)(14) of the 2019 Building Energy Efficiency Standards, low-rise residential up to 3 stories must install PV systems. Percentage is proportional to types of units.

Water Mitigation - Pursuant to CALGreen 20% indoor water use reduction

Table Name	Column Name	Default Value	New Value
tblAreaCoating	Area_EF_Nonresidential_Exterior	150	100
tblAreaCoating	Area_EF_Residential_Exterior	150	100
tblAreaMitigation	UseLowVOCPaintNonresidentialExteriorValue	100	150
tblAreaMitigation	UseLowVOCPaintResidentialExteriorValue	100	150
tblConstructionPhase	NumDays	220.00	1.00
tblConstructionPhase	PhaseEndDate	9/15/2038	11/12/2037
tblEnergyUse	NT24E	3,172.76	4,097.39
tblEnergyUse	NT24E	3,054.10	3,978.73
tblEnergyUse	NT24E	6,155.97	7,080.60
tblEnergyUse	NT24NG	3,155.00	0.00
tblEnergyUse	NT24NG	3,155.00	0.00
tblEnergyUse	NT24NG	3,155.00	0.00
tblEnergyUse	T24E	77.89	2,045.21
tblEnergyUse	T24E	70.89	1,602.67
tblEnergyUse	T24E	68.41	6,948.12
tblEnergyUse	T24NG	6,712.79	0.00
tblEnergyUse	T24NG	5,226.68	0.00
tblEnergyUse	T24NG	23,474.54	0.00
tblFireplaces	FireplaceDayYear	11.14	0.00
tblFireplaces	FireplaceDayYear	11.14	0.00
tblFireplaces	FireplaceDayYear	11.14	0.00
tblFireplaces	FireplaceHourDay	3.50	0.00
tblFireplaces	FireplaceHourDay	3.50	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblFireplaces	FireplaceHourDay	3.50	0.00
tblFireplaces	FireplaceWoodMass	228.80	0.00
tblFireplaces	FireplaceWoodMass	228.80	0.00
tblFireplaces	FireplaceWoodMass	228.80	0.00
tblFireplaces	NumberGas	154.05	0.00
tblFireplaces	NumberGas	69.75	0.00
tblFireplaces	NumberGas	39.00	0.00
tblFireplaces	NumberNoFireplace	41.08	0.00
tblFireplaces	NumberNoFireplace	18.60	0.00
tblFireplaces	NumberNoFireplace	12.48	0.00
tblFireplaces	NumberWood	174.59	0.00
tblFireplaces	NumberWood	79.05	0.00
tblFireplaces	NumberWood	67.08	0.00
tblLandUse	Population	2,937.00	2,805.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tblWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tblWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWoodstoves	NumberCatalytic	20.54	0.00
tblWoodstoves	NumberCatalytic	9.30	0.00
tblWoodstoves	NumberCatalytic	6.24	0.00
tblWoodstoves	NumberNoncatalytic	20.54	0.00
tblWoodstoves	NumberNoncatalytic	9.30	0.00
tblWoodstoves	NumberNoncatalytic	6.24	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblWoodstoves	WoodstoveDayYear	14.12	0.00
tblWoodstoves	WoodstoveDayYear	14.12	0.00
tblWoodstoves	WoodstoveDayYear	21.06	0.00
tblWoodstoves	WoodstoveWoodMass	582.40	0.00
tblWoodstoves	WoodstoveWoodMass	956.80	0.00

2.0 Emissions Summary

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2037											0.0000	0.6997	0.6997	1.0000e-005	1.0000e-005	0.7036
Maximum											**0.0000**	**0.6997**	**0.6997**	**1.0000e-005**	**1.0000e-005**	**0.7036**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2037											0.0000	0.6997	0.6997	1.0000e-005	1.0000e-005	0.7036
Maximum											**0.0000**	**0.6997**	**0.6997**	**1.0000e-005**	**1.0000e-005**	**0.7036**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

		Highest		

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area											0.0000	19.9883	19.9883	0.0190	0.0000	20.4644
Energy											0.0000	11.3582	11.3582	0.0000	0.0000	11.3582
Mobile											0.0000	7,369.8774	7,369.8774	0.4412	0.3366	7,481.2163
Waste											177.3410	0.0000	177.3410	10.4806	0.0000	439.3549
Water											37.9890	0.7420	38.7310	0.1308	0.0826	66.6188
Total											**215.3301**	**7,401.9658**	**7,617.2959**	**11.0716**	**0.4192**	**8,019.0126**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area											0.0000	19.9883	19.9883	0.0190	0.0000	20.4644
Energy											0.0000	3.1803	3.1803	0.0000	0.0000	3.1803
Mobile											0.0000	7,369.8774	7,369.8774	0.4412	0.3366	7,481.2163
Waste											177.3410	0.0000	177.3410	10.4806	0.0000	439.3549
Water											37.9890	0.6990	38.6881	0.1308	0.0826	66.5758
Total											**215.3301**	**7,393.7449**	**7,609.0750**	**11.0716**	**0.4192**	**8,010.7917**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.11**	**0.11**	**0.00**	**0.00**	**0.10**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Architectural Coating	Architectural Coating	11/12/2037	11/12/2037	5	1	

Acres of Grading (Site Preparation Phase): 0

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 3,589,920; Residential Outdoor: 1,196,640; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Architectural Coating	1	226.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Architectural Coating - 2037

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road											0.0000	0.1277	0.1277	0.0000	0.0000	0.1278
Total											**0.0000**	**0.1277**	**0.1277**	**0.0000**	**0.0000**	**0.1278**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Architectural Coating - 2037

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker											0.0000	0.5720	0.5720	1.0000e-005	1.0000e-005	0.5758
Total											**0.0000**	**0.5720**	**0.5720**	**1.0000e-005**	**1.0000e-005**	**0.5758**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road											0.0000	0.1277	0.1277	0.0000	0.0000	0.1278
Total											**0.0000**	**0.1277**	**0.1277**	**0.0000**	**0.0000**	**0.1278**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Architectural Coating - 2037

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker											0.0000	0.5720	0.5720	1.0000e-005	1.0000e-005	0.5758
Total											**0.0000**	**0.5720**	**0.5720**	**1.0000e-005**	**1.0000e-005**	**0.5758**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated											0.0000	7,369.8774	7,369.8774	0.4412	0.3366	7,481.2163
Unmitigated											0.0000	7,369.8774	7,369.8774	0.4412	0.3366	7,481.2163

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	7,517.64	8,359.78	6449.56	17,288,249	17,288,249
Apartments Mid Rise	2,529.60	2,283.15	1901.85	5,553,946	5,553,946
Single Family Housing	1,472.64	1,488.24	1333.80	3,360,558	3,360,558
Total	11,519.88	12,131.17	9,685.21	26,202,752	26,202,752

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
Apartments Mid Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
Single Family Housing	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.555274	0.059572	0.187289	0.120548	0.022031	0.005855	0.011319	0.007376	0.000945	0.000497	0.025792	0.000881	0.002622
Apartments Mid Rise	0.555274	0.059572	0.187289	0.120548	0.022031	0.005855	0.011319	0.007376	0.000945	0.000497	0.025792	0.000881	0.002622

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Single Family Housing	0.555274	0.059572	0.187289	0.120548	0.022031	0.005855	0.011319	0.007376	0.000945	0.000497	0.025792	0.000881	0.002622

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Percent of Electricity Use Generated with Renewable Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated											0.0000	3.1803	3.1803	0.0000	0.0000	3.1803
Electricity Unmitigated											0.0000	11.3582	11.3582	0.0000	0.0000	11.3582
NaturalGas Mitigated											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	0											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total												**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	0											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total												**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	7.14069e +006	6.4779	0.0000	0.0000	6.4779
Apartments Mid Rise	2.94012e +006	2.6672	0.0000	0.0000	2.6672
Single Family Housing	2.43946e +006	2.2130	0.0000	0.0000	2.2130
Total		**11.3582**	**0.0000**	**0.0000**	**11.3582**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	1.99939e+006	1.8138	0.0000	0.0000	1.8138
Apartments Mid Rise	823234	0.7468	0.0000	0.0000	0.7468
Single Family Housing	683049	0.6197	0.0000	0.0000	0.6197
Total		**3.1803**	**0.0000**	**0.0000**	**3.1803**

6.0 Area Detail

6.1 Mitigation Measures Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated											0.0000	19.9883	19.9883	0.0190	0.0000	20.4644
Unmitigated											0.0000	19.9883	19.9883	0.0190	0.0000	20.4644

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping											0.0000	19.9883	19.9883	0.0190	0.0000	20.4644
Total											**0.0000**	**19.9883**	**19.9883**	**0.0190**	**0.0000**	**20.4644**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping											0.0000	19.9883	19.9883	0.0190	0.0000	20.4644
Total											**0.0000**	**19.9883**	**19.9883**	**0.0190**	**0.0000**	**20.4644**

7.0 Water Detail

7.1 Mitigation Measures Water

Apply Water Conservation Strategy

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	38.6881	0.1308	0.0826	66.5758
Unmitigated	38.7310	0.1308	0.0826	66.6188

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	66.9132 / 42.1844	24.1364	0.0815	0.0515	41.5155
Apartments Mid Rise	30.2966 / 19.1	10.9284	0.0369	0.0233	18.7972
Single Family Housing	10.164 / 6.40776	3.6663	0.0124	7.8200e-003	6.3062
Total		**38.7310**	**0.1308**	**0.0826**	**66.6188**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	66.9132 / 33.7475	24.1096	0.0815	0.0515	41.4887
Apartments Mid Rise	30.2966 / 15.28	10.9162	0.0369	0.0233	18.7850
Single Family Housing	10.164 / 5.12621	3.6622	0.0124	7.8200e-003	6.3021
Total		**38.6881**	**0.1308**	**0.0826**	**66.5758**

8.0 Waste Detail

8.1 Mitigation Measures Waste

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	177.3410	10.4806	0.0000	439.3549
Unmitigated	177.3410	10.4806	0.0000	439.3549

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	472.42	95.8970	5.6674	0.0000	237.5807
Apartments Mid Rise	213.9	43.4198	2.5660	0.0000	107.5706
Single Family Housing	187.32	38.0243	2.2472	0.0000	94.2035
Total		**177.3410**	**10.4806**	**0.0000**	**439.3549**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	472.42	95.8970	5.6674	0.0000	237.5807
Apartments Mid Rise	213.9	43.4198	2.5660	0.0000	107.5706
Single Family Housing	187.32	38.0243	2.2472	0.0000	94.2035
Total		**177.3410**	**10.4806**	**0.0000**	**439.3549**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

11.0 Vegetation

Appendix D

Construction Noise Modeling Results

Roadway Construction Noise Model (RCNM),Version 1.1

Report date 9/30/2022
Case Descr San Leandro HE

			---- Receptor #1 ----
	Baselines (dBA)		
Descriptior Land Use	Daytime	Evening	Night
50 Feet fro Residential	65	60	55

			Equipment			
			Spec	Actual	Receptor	Estimated
	Impact		Lmax	Lmax	Distance	Shielding
Description	Device	Usage(%)	(dBA)	(dBA)	(feet)	(dBA)
Excavator	No	40		80.7	50	0
Dozer	No	40		81.7	50	0
Jackhammer	Yes	20		88.9	50	0

			Results											
	Calculated (dBA)		Noise Limits (dBA)						Noise Limit Exceedance (dBA)					
			Day		Evening		Night		Day		Evening		Night	
Equipment	*Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq
Excavator	80.7	76.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Dozer	81.7	77.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jackhammer	88.9	81.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	88.9	84.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

*Calculated Lmax is the Loudest value.

Roadway Construction Noise Model (RCNM),Version 1.1

Report date 9/30/2022
Case Descr Los Altos Housing Element with Pile Driver

			---- Receptor #1 ----
	Baselines (dBA)		
Descriptior Land Use	Daytime	Evening	Night
50 Feet fro Residential	65	60	55

			Equipment			
			Spec	Actual	Receptor	Estimated
	Impact		Lmax	Lmax	Distance	Shielding
Description	Device	Usage(%)	(dBA)	(dBA)	(feet)	(dBA)
Excavator	No	40		80.7	50	0
Dozer	No	40		81.7	50	0
Jackhammer	Yes	20		88.9	50	0
Impact Pile Driver	Yes	20		101.3	50	0

			Results											
	Calculated (dBA)		Noise Limits (dBA)						Noise Limit Exceedance (dBA)					
			Day		Evening		Night		Day		Evening		Night	
Equipment	*Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq
Excavator	80.7	76.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Dozer	81.7	77.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jackhammer	88.9	81.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Impact Pile Driver	101.3	94.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	101.3	94.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

*Calculated Lmax is the Loudest value.

Appendix E

AB 52 Correspondence

Community Development Department
One North San Antonio Road
Los Altos, California 94022-3087

March 9, 2022

Amah Mutsun Tribal Band
Valentin Lopez, Chairperson
P.O. Box 5272
Galt, CA 95632
Via Email: vlopez@amahmutsun.org

RE: Assembly Bill 52 and Senate Bill 18 Consultation, Los Altos Housing Element Update, City of Los Altos, Santa Clara County, California

Dear Chairperson Lopez:

The City of Los Altos is preparing an EIR for the proposed Los Altos Housing Element Update. The proposed project consists of an update of the City of Los Altos' General Plan Housing Element for the 2023-2031 (6th Cycle) planning period, which includes necessary rezones and updates to other General Plan elements. Specifically, the Housing Element Site Assessment will identify sites that can accommodate density requirements and additional units, and as necessary, properties will be rezoned. The housing sites inventory and specific land use changes that would occur under the Housing Element update have not yet been developed and will be available upon request after completion. The project also includes any necessary amendments to the General Plan to maintain consistence among General Plan elements and with the municipal code.

The proposed project must comply with California Public Resources Code § 21080.3.1 (Assembly Bill [AB] 52 of 2014), which requires local governments to conduct meaningful consultation with California Native American tribes that have requested to be notified by lead agencies of proposed projects in the geographic area with which the tribe is traditionally and culturally affiliated.

The proposed project includes an update to the General Plan Housing Element and, therefore, must also comply with California Public Resources Code § 65352.3 – 65352.4 (Senate Bill 18), which requires local governments to conduct meaningful consultation with California Native American tribes on the contact list maintained by the Native American Heritage Commission prior to the adoption or amendment of a city or county general plan for the purpose of protecting cultural places on lands affected by the proposal.

Your tribe's input is important to the City of Los Altos planning process. We request that you advise us as early as possible if you wish to consult on the proposed project. Under AB 52, you have 30 days and under the provisions of SB 18, have 90 days from the date of receipt of this notice to advise the City if you are interested in further consultation. If you require any

additional information or have any questions, please contact me at (650)947-2635 or via e-mail at lsimpson@losaltosca.gov. Thank you for your assistance.

Sincerely,

Signature: Laura Simpson (Mar 9, 2022 13:53 PST)

Email: lsimpson@losaltosca.gov

Laura Simpson
Interim Planning Director
City of Los Altos

Enclosed:
Map of Los Altos

Community Development Department
One North San Antonio Road
Los Altos, California 94022-3087

March 9, 2022

Amah Mutsun Tribal Band of Mission San Juan Bautista
Irene Zwierlein, Chairperson
3030 Soda Bay Road
Lakeport, CA 95453
Via Email: amahmutsuntribal@gmail.com

RE: Assembly Bill 52 and Senate Bill 18 Consultation, Los Altos Housing Element Update, City of Los Altos, Santa Clara County, California

Dear Chairperson Zwierlein:

The City of Los Altos is preparing an EIR for the proposed Los Altos Housing Element Update. The proposed project consists of an update of the City of Los Altos' General Plan Housing Element for the 2023-2031 (6th Cycle) planning period, which includes necessary rezones and updates to other General Plan elements. Specifically, the Housing Element Site Assessment will identify sites that can accommodate density requirements and additional units, and as necessary, properties will be rezoned. The housing sites inventory and specific land use changes that would occur under the Housing Element update have not yet been developed and will be available upon request after completion. The project also includes any necessary amendments to the General Plan to maintain consistence among General Plan elements and with the municipal code.

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Signature: Laura Simpson (Mar 9, 2022 13:53 PST)

Email: lsimpson@losaltosca.gov

Laura Simpson
Interim Planning Director
City of Los Altos

Enclosed:
Map of Los Altos

Community Development Department
One North San Antonio Road
Los Altos, California 94022-3087

March 9, 2022

Indian Canyon Mutsun Band of Costanoan
Ann Marie Sayers, Chairperson
P.O. Box 28
Hollister, CA 95024
Via Email: ams@indiancanyons.org

RE: Assembly Bill 52 and Senate Bill 18 Consultation, Los Altos Housing Element Update, City of Los Altos, Santa Clara County, California

Dear Chairperson Sayers:

The City of Los Altos is preparing an EIR for the proposed Los Altos Housing Element Update. The proposed project consists of an update of the City of Los Altos' General Plan Housing Element for the 2023-2031 (6th Cycle) planning period, which includes necessary rezones and updates to other General Plan elements. Specifically, the Housing Element Site Assessment will identify sites that can accommodate density requirements and additional units, and as necessary, properties will be rezoned. The housing sites inventory and specific land use changes that would occur under the Housing Element update have not yet been developed and will be available upon request after completion. The project also includes any necessary amendments to the General Plan to maintain consistence among General Plan elements and with the municipal code.

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Sincerely,

Signature: Laura Simpson (Mar 9, 2022 13:53 PST)

Email: lsimpson@losaltosca.gov

Laura Simpson
Interim Planning Director
City of Los Altos

Enclosed:
Map of Los Altos

Community Development Department
One North San Antonio Road
Los Altos, California 94022-3087

March 9, 2022

Muwekma Ohlone Indian Tribe of the SF Bay Area
Charlene Nijmeh, Chairperson
20885 Redwood Road, Suite 232
Castro Valley, CA 94546
Via Email: cnijmeh@muwekma.org

RE: Assembly Bill 52 and Senate Bill 18 Consultation, Los Altos Housing Element Update, City of Los Altos, Santa Clara County, California

Dear Chairperson Nijmeh:

The City of Los Altos is preparing an EIR for the proposed Los Altos Housing Element Update. The proposed project consists of an update of the City of Los Altos' General Plan Housing Element for the 2023-2031 (6th Cycle) planning period, which includes necessary rezones and updates to other General Plan elements. Specifically, the Housing Element Site Assessment will identify sites that can accommodate density requirements and additional units, and as necessary, properties will be rezoned. The housing sites inventory and specific land use changes that would occur under the Housing Element update have not yet been developed and will be available upon request after completion. The project also includes any necessary amendments to the General Plan to maintain consistence among General Plan elements and with the municipal code.

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Signature: Laura Simpson (Mar 9, 2022 13:53 PST)

Email: lsimpson@losaltosca.gov

Laura Simpson
Interim Planning Director
City of Los Altos

Enclosed:
Map of Los Altos

Community Development Department
One North San Antonio Road
Los Altos, California 94022-3087

March 9, 2022

North Valley Yokuts Tribe
Katherine Erolinda Perez, Chairperson
P.O. Box 717
Linden, CA 95236
Via Email: canutes@verizon.net

RE: Assembly Bill 52 and Senate Bill 18 Consultation, Los Altos Housing Element Update, City of Los Altos, Santa Clara County, California

Dear Chairperson Perez:

The City of Los Altos is preparing an EIR for the proposed Los Altos Housing Element Update. The proposed project consists of an update of the City of Los Altos' General Plan Housing Element for the 2023-2031 (6th Cycle) planning period, which includes necessary rezones and updates to other General Plan elements. Specifically, the Housing Element Site Assessment will identify sites that can accommodate density requirements and additional units, and as necessary, properties will be rezoned. The housing sites inventory and specific land use changes that would occur under the Housing Element update have not yet been developed and will be available upon request after completion. The project also includes any necessary amendments to the General Plan to maintain consistence among General Plan elements and with the municipal code.

The proposed project must comply with California Public Resources Code § 21080.3.1 (Assembly Bill [AB] 52 of 2014), which requires local governments to conduct meaningful consultation with California Native American tribes that have requested to be notified by lead agencies of proposed projects in the geographic area with which the tribe is traditionally and culturally affiliated.

The proposed project includes an update to the General Plan Housing Element and, therefore, must also comply with California Public Resources Code § 65352.3 – 65352.4 (Senate Bill 18), which requires local governments to conduct meaningful consultation with California Native American tribes on the contact list maintained by the Native American Heritage Commission prior to the adoption or amendment of a city or county general plan for the purpose of protecting cultural places on lands affected by the proposal.

Your tribe's input is important to the City of Los Altos planning process. We request that you advise us as early as possible if you wish to consult on the proposed project. Under AB 52, you have 30 days and under the provisions of SB 18, have 90 days from the date of receipt of this notice to advise the City if you are interested in further consultation. If you require any

additional information or have any questions, please contact me at (650)947-2635 or via e-mail at lsimpson@losaltosca.gov. Thank you for your assistance.

Sincerely,

Signature: Laura Simpson (Mar 9, 2022 13:53 PST)

Email: lsimpson@losaltosca.gov

Laura Simpson
Interim Planning Director
City of Los Altos

Enclosed:
Map of Los Altos

Community Development Department
One North San Antonio Road
Los Altos, California 94022-3087

March 9, 2022

Rumsen Am:a Tur:ataj Ohlone
Dee Dee Manzanares Ybarra, Chairperson
14671 Farmington Street
Herperia, CA 92345
Via Email: rumsenama@gmail.com

RE: Assembly Bill 52 and Senate Bill 18 Consultation, Los Altos Housing Element Update, City of Los Altos, Santa Clara County, California

Dear Chairperson Ybarra:

The City of Los Altos is preparing an EIR for the proposed Los Altos Housing Element Update. The proposed project consists of an update of the City of Los Altos' General Plan Housing Element for the 2023-2031 (6th Cycle) planning period, which includes necessary rezones and updates to other General Plan elements. Specifically, the Housing Element Site Assessment will identify sites that can accommodate density requirements and additional units, and as necessary, properties will be rezoned. The housing sites inventory and specific land use changes that would occur under the Housing Element update have not yet been developed and will be available upon request after completion. The project also includes any necessary amendments to the General Plan to maintain consistence among General Plan elements and with the municipal code.

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Sincerely,

Signature: Laura Simpson (Mar 9, 2022 13:53 PST)

Email: lsimpson@losaltosca.gov

Laura Simpson
Interim Planning Director
City of Los Altos

Enclosed:
Map of Los Altos

Community Development Department
One North San Antonio Road
Los Altos, California 94022-3087

March 9, 2022

Tamien Nation
Quirina Luna Geary, Chairperson
P.O. Box 8053
San Jose, CA 95155
Via Email: qgeary@tamien.org

RE: Assembly Bill 52 and Senate Bill 18 Consultation, Los Altos Housing Element Update, City of Los Altos, Santa Clara County, California

Dear Chairperson Geary:

The City of Los Altos is preparing an EIR for the proposed Los Altos Housing Element Update. The proposed project consists of an update of the City of Los Altos' General Plan Housing Element for the 2023-2031 (6th Cycle) planning period, which includes necessary rezones and updates to other General Plan elements. Specifically, the Housing Element Site Assessment will identify sites that can accommodate density requirements and additional units, and as necessary, properties will be rezoned. The housing sites inventory and specific land use changes that would occur under the Housing Element update have not yet been developed and will be available upon request after completion. The project also includes any necessary amendments to the General Plan to maintain consistence among General Plan elements and with the municipal code.

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Sincerely,

Signature: Laura Simpson (Mar 9, 2022 13:53 PST)

Email: lsimpson@losaltosca.gov

Laura Simpson
Interim Planning Director
City of Los Altos

Enclosed:
Map of Los Altos

Community Development Department
One North San Antonio Road
Los Altos, California 94022-3087

March 9, 2022

The Confederated Villages of Lisjan
Corrina Gould, Chairperson
10926 Edes Avenue
Oakland, CA 94603
Via Email: cvltribe@gmail.com

RE: Assembly Bill 52 and Senate Bill 18 Consultation, Los Altos Housing Element Update, City of Los Altos, Santa Clara County, California

Dear Chairperson Gould:

The City of Los Altos is preparing an EIR for the proposed Los Altos Housing Element Update. The proposed project consists of an update of the City of Los Altos' General Plan Housing Element for the 2023-2031 (6th Cycle) planning period, which includes necessary rezones and updates to other General Plan elements. Specifically, the Housing Element Site Assessment will identify sites that can accommodate density requirements and additional units, and as necessary, properties will be rezoned. The housing sites inventory and specific land use changes that would occur under the Housing Element update have not yet been developed and will be available upon request after completion. The project also includes any necessary amendments to the General Plan to maintain consistence among General Plan elements and with the municipal code.

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additional information or have any questions, please contact me at (650)947-2635 or via e-mail at lsimpson@losaltosca.gov. Thank you for your assistance.

Sincerely,

Signature: Laura Simpson (Mar 9, 2022 13:53 PST)

Email: lsimpson@losaltosca.gov

Laura Simpson
Interim Planning Director
City of Los Altos

Enclosed:
Map of Los Altos

Community Development Department
One North San Antonio Road
Los Altos, California 94022-3087

March 9, 2022

The Ohlone Indian Tribe
Andrew Galvan
P.O. Box 3388
Fremont, CA 94539
Via Email: chochenyo@aol.com

RE: Assembly Bill 52 and Senate Bill 18 Consultation, Los Altos Housing Element Update, City of Los Altos, Santa Clara County, California

Dear Mr. Galvan:

The City of Los Altos is preparing an EIR for the proposed Los Altos Housing Element Update. The proposed project consists of an update of the City of Los Altos' General Plan Housing Element for the 2023-2031 (6th Cycle) planning period, which includes necessary rezones and updates to other General Plan elements. Specifically, the Housing Element Site Assessment will identify sites that can accommodate density requirements and additional units, and as necessary, properties will be rezoned. The housing sites inventory and specific land use changes that would occur under the Housing Element update have not yet been developed and will be available upon request after completion. The project also includes any necessary amendments to the General Plan to maintain consistence among General Plan elements and with the municipal code.

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Sincerely,

Signature: Laura Simpson (Mar 9, 2022 13:53 PST)

Email: lsimpson@losaltosca.gov

Laura Simpson
Interim Planning Director
City of Los Altos

Enclosed:
Map of Los Altos

Community Development Department
One North San Antonio Road
Los Altos, California 94022-3087

March 9, 2022

Wuksache Indian Tribe/Eshom Valley Band
Kenneth Woodrow, Chairperson
1179 Rock Haven Ct.
Salinas, CA 93906
Via Email: kwood8934@aol.com

RE: Assembly Bill 52 and Senate Bill 18 Consultation, Los Altos Housing Element Update, City of Los Altos, Santa Clara County, California

Dear Chairperson Woodrow:

The City of Los Altos is preparing an EIR for the proposed Los Altos Housing Element Update. The proposed project consists of an update of the City of Los Altos' General Plan Housing Element for the 2023-2031 (6th Cycle) planning period, which includes necessary rezones and updates to other General Plan elements. Specifically, the Housing Element Site Assessment will identify sites that can accommodate density requirements and additional units, and as necessary, properties will be rezoned. The housing sites inventory and specific land use changes that would occur under the Housing Element update have not yet been developed and will be available upon request after completion. The project also includes any necessary amendments to the General Plan to maintain consistence among General Plan elements and with the municipal code.

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additional information or have any questions, please contact me at (650)947-2635 or via e-mail at lsimpson@losaltosca.gov. Thank you for your assistance.

Sincerely,

Signature: Laura Simpson (Mar 9, 2022 13:53 PST)

Email: lsimpson@losaltosca.gov

Laura Simpson
Interim Planning Director
City of Los Altos

Enclosed:
Map of Los Altos

Native American Tribes Letters for SB 18 AB 52 Combined Letter for Los Altos Housing Element

Final Audit Report 2022-03-09

Created:	2022-03-09
By:	Yvonne Dupont (ydupont@losaltosca.gov)
Status:	Signed
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"Native American Tribes Letters for SB 18 AB 52 Combined Letter for Los Altos Housing Element" History

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Signature Date: 2022-03-09 - 9:53:39 PM GMT - Time Source: server- IP address: 207.140.44.2

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Adobe Sign

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

November 10, 2022

Nick Zornes, Director
Development Services
City of Los Altos
1 North San Antonio Rd
Los Altos, CA 94022

Dear Nick Zornes:

RE: City of Los Altos' 6th Cycle (2023-2031) Draft Housing Element

Thank you for submitting the City of Los Altos' (City) draft housing element received for review on August 12, 2022. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on October 26, 2022 with yourself, and consultants Jennifer Murillo, Stefano Richichi, David Bergman, and Erik Ramakrishnan. HCD also considered public comments from Anne Paulson pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (January 31, 2023), then any rezoning to make prior identified sites available or accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i). Please be aware, if the City fails to adopt a compliant housing element within one year from the statutory deadline, the element cannot be found in substantial compliance until rezones to accommodate a shortfall of sites pursuant to Government Code section 65583, subdivision (c) (1) (A) and Government Code section 65583.2, subdivision (c) are completed.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City meets housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: https://www.opr.ca.gov/planning/general-plan/guidelines.html.

HCD appreciates the cooperation the housing element team provided during the review. We are committed to assist the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Anthony Errichetto, of our staff, at Anthony.errichetto@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

Enclosure

APPENDIX
CITY OF LOS ALTOS

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at https://www.hcd.ca.gov/hcd-memos. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks),* available at https://www.hcd.ca.gov/building-blocks and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

the previous element to evaluate the appropriateness, effectiveness, and Review progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

As part of the review of programs in the past cycle, the element must provide an evaluation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness).

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2…shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

   Outreach and Enforcement: The element generally satisfies this requirement; however, annual outreach should be added to the programs section.

   Integration and Segregation: To assist in meeting this requirement, the element should provide local data not captured in regional, state, or federal data analysis to help describes what contributes to the higher concentration of nonwhite residents in the southern part of the City. In addition, the element generally describes local patterns and trends related to integration and segregation but must also analyze the City relative to the rest of the region regarding familial status.

   Racial/Ethnic Concentrated Areas of Affluence (RCAA): The element briefly mentions HCD's recent data related to RCAAs within the City, but generally should also evaluate

the patterns and changes over time at a local (e.g., neighborhood to neighborhood) and regional level (e.g., city to region).

Disparities in Access to Opportunity: The element provides information on the access to opportunity through the TCAC opportunity maps but must also provide a complete local and regional analysis of patterns and trends for all components of the assessment of fair housing. A comprehensive analysis should include the local and regional disparities of the educational, environmental, and economic scores through local, federal, and/or state data. It should also analyze persons with disabilities as well as access to transit. Please refer to page 35 of the AFFH guidebook (https://www.hcd.ca.gov/community-development/affh/index.shtml#guidance) for specific factors that should be considered when analyzing access to opportunities as it pertains to educational, employment, environmental, transportation, and any factors that are unique to the City. Specifically, the element should analyze what contributes to the City's low economic resource score, what contributes to the one area with a higher educational score, include local information to describe what contributes to environmental conditions, and describe the quality of transit access within the City and regionally.

Disproportionate Housing Needs: The element includes some local and county data on cost burdened households (overpayment) and substandard housing. However, the element must relate the concentration of cost burden to other factors and discuss what contributes to the differences within the City and regionally. The element should also discuss whether there are any concentrations of substandard housing within the City and relate those conditions to the region. As well, the discussion regarding displacement should address risk and disproportionate impacts on protected characteristics due to natural disaster.

Identified Sites and Affirmatively Furthering Fair Housing (AFFH): While the element includes some AFFH requirements it generally does not address this requirement. The analysis must identify whether sites improve or exacerbate conditions and whether sites are isolated by income group. A full analysis should address the income categories of identified sites with respect to location, the number of sites and units by all income groups and how that affects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). The element should also discuss whether the distribution of sites improves or exacerbates conditions. If sites exacerbate conditions, the element should identify further program actions that will be taken to promote equitable quality of life throughout the community (e.g., anti-displacement and place-based community revitalization strategies).

2. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

   Overpayment: While the element identifies the total number of households overpaying for housing, it must quantify and analyze the number of lower-income households

overpaying for housing by tenure (i.e., renter and owner) and add or modify policies and programs as appropriate.

Housing Costs: While the element includes information on sales prices, rental information from the American Community Survey does not fully reflect market conditions and the element should include additional data sources.

3. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Progress in Meeting the Regional Housing Needs Allocation (RHNA): The element relies on pipeline projects to meet its RHNA, specifically, the element has identified 587 units that are either pending, approved, or under construction. First, to count these units as progress towards RHNA, the element must demonstrate these units are expected to be constructed during the planning period. To demonstrate the availability of units within the planning period, the element could analyze infrastructure schedules, City's past completion rates on pipeline projects, outreach with project developers, and should describe any expiration dates on entitlements, anticipated timelines for final approvals, and any remaining steps for projects to receive final entitlements. Additionally, given the element's reliance on pipeline projects, the element should include programs that commit to facilitating development and monitoring approvals of the projects (e.g., coordination with applicants to approve remaining entitlements, supporting funding applications, expediating approvals, rezoning or identification of additional sites should the applications not be approved).

Realistic Capacity: While the element provides assumptions of buildout for sites included in the inventory, it must also provide support for these assumptions. The element should provide additional examples of typical densities of existing or approved projects at similar income levels. Table B-5 on pages B-8 and B-9 should be related to the sites inventory and include affordability levels for the projects listed. In addition, the element appears to assume residential development on sites with zoning that allow 100 percent nonresidential uses. While the element mentions strong market demand for residential uses within nonresidential zones, it must still account for the likelihood of nonresidential uses. For example, the element could analyze all development activity in these nonresidential zones, how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly. For additional information, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#zoning.

Suitability of Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. To address this requirement, the element generally describes the existing use of nonvacant sites. This alone is not

adequate to demonstrate the potential for redevelopment in the planning period. The description of existing uses should be sufficiently detailed to facilitate an analysis demonstrating the potential for additional development in the planning period for each specific parcel. In addition, the element must analyze the extent that existing uses may impede additional residential development, including analysis of existing leases or contracts that would perpetuate the existing use or prevent additional residential development and include current information on development trends and market conditions in the City and relate those trends to the sites identified. Finally, the analysis should address public comment related to the identified sites and potential for redevelopment and add or remove sites as appropriate.

In addition, if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households, the housing element must demonstrate that the existing use is not an impediment to additional residential development in the planning period (Gov. Code, § 65583.2, subd. (g)(2).). This can be demonstrated by providing substantial evidence that the existing use is likely to be discontinued during the planning period. Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.

Environmental Constraints: While the element generally describes a few environmental conditions within the City (p. C-38), it must describe how these conditions relate to identified sites including environmental constraints within the City that could impact housing development in the planning period such as seismic activity and wildfire threats. The element should also discuss any other known conditions that may impede or preclude development on identified sites in the planning period (e.g., parcel shape, easements, contamination). For additional information and sample analysis, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#environmental.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

Zoning for a Variety of Housing Types:

- *Accessory Dwelling Units (ADUs)*: The element indicates the City modifies its zoning code to ease barriers to the development of ADU's. However, after a cursory review of the City's ordinance, HCD discovered several areas which are not consistent with State ADU Law. HCD will provide a complete listing of ADU noncompliance issues under a separate cover. As a result, the element should

add a program to update the City's ADU ordinance in order to comply with state law.

- *Emergency Shelters*: The element mentions emergency shelters are permitted in the PUD/C zone; however this zone is not listed in Table C-5 or Table C-6. The element should describe the development standards of the PUD/C zone or other zones that allows emergency shelters by-right (without discretionary action) and should provide an analysis of capacity, including potential for reuse and proximity to transportation and services and any conditions inappropriate for human habitability. The element should also clarify shelters are permitted without discretionary action and discuss available acreage in the overlay zone, including typical parcel sizes and the presence of reuse opportunities. In addition, the element should describe how emergency shelter parking requirements comply with AB139/Government Code section 65583, subdivision (a)(4)(A) or include a program to comply with this requirement. Lastly, the element should clarify the exact total capacity for emergency shelters. For additional information and a sample analysis, see the Building Blocks at http://www.hcd.ca.gov/community-development/housing-element/housing-element-emos/docs/sb2_memo050708.pdf.
- *Single Room Occupancy (SRO) Units*: The element should describe whether the City has any procedures to encourage and facilitate SRO development in the allowable zoning districts.
- *Manufactured Housing*: Manufactured homes that are built on a permanent foundation must be allowed in the same manner and in the same zones as conventional or stick-built structures. Specifically, manufactured homes on a permanent structure should only be subject to the same development standards that a conventional single-family residential dwelling would be subject to. The element must demonstrate consistency with this requirement or add or modify programs as appropriate.

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

   Land Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. For example, the analysis must analyze maximum lot coverage, height limits, setbacks in all zones allowing residential uses, particularly higher density. The analyses should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints.

   Minimum Unit Sizes: The element mentions minimum unit size requirements that would preclude smaller units (e.g., "affordable by design" apartments), these requirements

should be described and analyzed as a potential constraint, and programs should be added to address identified constraints.

Parking Requirements: The element provides a brief discussion regarding the City's high parking requirements and provides Program 3.A (Prepare a Downtown parking plan and update parking requirements); however the program should provide a specific commitment to study and update parking requirements throughout the entire City to remove all potential constraints. In addition, Program 3.A should commit to revising parking standards for commercial and high-density residential zoning districts including, parking requirements that exceed a sliding scale for commercial and high-density residential zoning districts, covered versus underground parking requirements, and guest parking requirements.

Fees and Exactions: The element must describe all required fees for single family and multifamily housing development (i.e., zoning change, general plan change, lot splits, in lieu fees, impact fees, etc.) and analyze their impact as potential constraints on housing supply and affordability. For example, the analysis could identify the total amount of fees and their proportion to the development costs for both single family and multifamily housing. In addition, the City's fees should be analyzed relative to other jurisdictions in the county, which currently are significantly greater than surrounding jurisdictions, and add a program to address any potential constraints. In addition, the element indicates that fees for multifamily projects are significantly greater than those for single-family projects, an uncommon observation not found in other comparable jurisdictions. Excessive fees for multifamily projects have significant impacts on housing affordability and production. The element should include an evaluation of these fees and add programs to address the constraint as appropriate.

Zoning and Fees Transparency: The element must clarify compliance with new transparency requirements for posting all zoning, development standards and fees on the City's website and add a program to address these requirements, if necessary.

Local Processing and Permit Procedures: While the element includes information about processing times in Table C-8, it should clarify the typical average time for single family and multifamily processing times. The element should also describe and evaluate the process for a typical development complying with zoning including approval body, number of public hearings, approval findings and any other relevant factors for impacts on housing cost, timing, feasibility and approval certainty. Lastly, the element should clearly describe whether the Planned Development process, including subsequent use permit, is required or optional to applicants. If required, the element should include specific analysis of the impacts of absence of fixed development standards on housing supply (number of units), cost, timing, feasibility, and approval certainty.

C. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element... (Gov. Code, § 65583, subd. (c).)*

   To have a beneficial impact and achieve the goals and objectives of the housing element, programs must have specific commitments and discrete timing (e.g., at least annually, by a specific date). Programs that should be revised include:

   - *Program 1.B (Higher Density in CT District)*: The program should provide commitments to specific actions and the timeline should occur earlier in the planning period for accountability, tracking, and potential modification.
   - *Program 1.C (Housing in OA District)*: The timeline for the program should occur earlier in the planning period for more significant impact.
   - *Program 1.D (Housing on Church Lands)*: The timeline for the program should occur earlier in the planning period for more significant impact.
   - *Program 1.E (Update Specific Plan)*: The program should provide a specific commitment to remove objective design standards (i.e., "landscape and beautification"). As well, the timeline for the program should occur earlier in the planning period for more significant impact.
   - *Program 1.H (City-Owned Sites)*: The program should commit to provide specific incentives.
   - *Program 1.I (Downtown Lot Consolidation Incentive)*: The program should provide a specific commitment to establishing lot consolidation incentives beyond evaluating.
   - *Program 2.A (Enhance Inclusionary Housing Requirements)*: The program should provide a specific commitment to modifying fees to address constraints.
   - *Program 2.C (Affordable Housing Funding)*: The program should include outreach to developers to promote incentives. Also clarify whether incentives are currently in place, if not then include timelines for their implementation.
   - *Program 3.A (Prepare a Downtown parking plan and update parking requirements)*: As mentioned earlier, the program should provide a specific commitment to study and update parking requirements throughout the entire City and address all constraints.
   - *Program 3.B (Building Heights in Mixed-Use Zones)*: The program should specify how many stories will be allowed. In addition, the program should be revised to address height constraints for the entire City.
   - *Program 3.H (Design Review Process Update)*: The specific commitments provided in the program are likely insignificant to reducing the design review constraint (i.e., persistence of the planning commission and city council vote during the event of an appeal which is very likely given the elements admissions

to "community resistance to housing (page C-38). In addition, the program should also remove other subjective design review bodies such as the third-party independent architect review. Furthermore, the program must commit to further evaluate midcycle progress and commit to making changes if necessary to address the constraint.

- *Program 4.C (Low Barrier Navigation Centers)*: The timeline for the program should occur earlier in the planning period. because it is a carryover program from the previous planning cycle – no later than 1 year.
- *Program 4.D (Transitional and Supportive Housing)*: The program must specifically commit to comply with AB 2162. In addition, the timeline for the program should occur earlier in the planning period.
- *Program 4.E (Employee/Farmworker Housing)*: The timeline for the program should occur earlier in the planning period because it is a carryover program from the previous planning cycle – no later than 1 year.
- *Program 4.F (Reasonable Accommodations)*: The timeline for the program should occur earlier in the planning period because it is a carryover program from the previous planning cycle – no later than 1 year.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (*Gov. Code, § *65583, subd. (c)(1).)*

   As noted in Finding B3, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised, as follows:

   - *Prior Identified Sites*: Program 1.G (Rezone Sites from Previous Housing Element) should commit to rezone sites at appropriate densities (e.g., allow at least 30 units per acre).
   - *Density Bonus*: The element should include a program to ensure the City will update to meet State Density Bonus Law.
   - *SB 9*: The element should include a program to implement SB9 in compliance with State law.

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

   As noted in Finding B4, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

4. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

   As noted in Finding B1, the element must include a complete analysis of AFFH. The element must be revised to add goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, metrics, milestones, and geographic targeting as appropriate and must address housing mobility enhancement (more choices and affordability across geographies), new housing choices and affordability in higher opportunity and income areas (e.g., missing middle housing types), place-based strategies for community preservation and revitalization and displacement protection. Housing mobility and new opportunities in higher resource areas should not be limited to the RHNA and, instead, target meaningful change in terms of fair housing issues. In addition, the element should be revised as follows:

   - *Program 2.D (ADU Streamlining)*: The program should geographically target outreach to single family households.
   - *Program 4.J (Alternative Transportation Incentive)*: The program should geographically target actions toward unsafe, lower resource, and underdeveloped infrastructure (i.e., sidewalks, protected bike lanes, etc.).
   - *Program 6.C (Housing in Highest Resource Areas)*: The program should also disseminate information on the City website.
   - *Program 6.D (Section 8 Vouchers)*: The program should implement geographic targeting as well as track and modify actions as necessary to accomplish a desirable metric.
   - *Program 6.E (Anti-Displacement Outreach)*: The timeline for the program should occur earlier in the planning period for more significant impact.

5. *Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent.. (Gov. Code, § 65583, subd. (c)(7).)*

   The element should be revised as follows:

   - *Program 2.D (ADU Streamlining)*: The program must be modified to include necessary revisions to the City's ADU ordinance to comply with State law. The program should also provide specific commitments to remove barriers to the review process and clarify what incentives (i.e., processing and fees) will be implemented as well as how often outreach will occur.

D. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd. (c)(9).)

While the element includes a general summary of the public participation process, the element should also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element, including who attended and what feedback was provided. In addition, the element should describe additional methods for public outreach efforts in the future, particularly to include lower-income and special needs households.

Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Yana Garcia
Secretary for
Environmental Protection

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

December 28, 2022

Mr. Nick Zornes
City of Los Altos
1 North San Antonio Road
Los Altos, CA 94022
NZornes@losaltosca.gov

MITIGATED NEGATIVE DECLARATION FOR CITY OF LOS ALTOS 2023-2031 HOUSING ELEMENT UPDATE – DATED NOVEMBER 2022
(STATE CLEARINGHOUSE NUMBER: 2022110605)

Dear Mr. Zornes:

The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for the City of Los Altos 2023-2031 Housing Element Update (Project). The Lead Agency is receiving this notice from DTSC because the Project includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.

DTSC recommends that the following issues be evaluated in the Hazards and Hazardous Materials section of the MND:

1. A State of California environmental regulatory agency such as DTSC, a Regional Water Quality Control Board (RWQCB), or a local agency that meets the requirements of Health and Safety Code section 101480 should provide regulatory concurrence that project sites are safe for construction and the proposed use.
2. The MND acknowledges the potential for historic or future activities on or near the project site to result in the release of hazardous wastes/substances on the project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the

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contamination, and the potential threat to public health and/or the environment should be evaluated. The MND should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.

3. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel additive in California. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aerially deposited lead (ADL) being deposited in and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil DTSC, recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project described in the MND.

4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 *Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers*.

5. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to DTSC's 2001 *Information Advisory Clean Imported Fill Material*.

6. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the MND. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 *Interim Guidance for Sampling Agricultural Properties (Third Revision)*.

DTSC appreciates the opportunity to comment on the MND. Should you need any assistance with an environmental investigation, please visit DTSC's Site Mitigation and Restoration Program page to apply for lead agency oversight. Additional information regarding voluntary agreements with DTSC can be found at DTSC's Brownfield website.

If you have any questions, please contact me at (916) 255-3710 or via email at Gavin.McCreary@dtsc.ca.gov.

Sincerely,

Gavin McCreary
Project Manager
Site Evaluation and Remediation Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and Research
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Mr. Dave Kereazis
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

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.

Shree Dharasker
Associate Engineer Civil
Community Projects Review Unit
(408)630-3037

Mitigation Monitoring and Reporting Program

The Initial Study-Mitigated Negative Declaration (IS-MND) identifies the applicable mitigation measures that will be implemented to reduce the impacts associated with the City of Los Altos 2023-2031 Housing Element Update Project. The California Environmental Quality Act (CEQA) requires a public agency to adopt a monitoring and reporting program for assessing and ensuring compliance with any required mitigation measures applied to proposed development. As stated in section 21081.6(a)(1) of the Public Resources Code:

> ...the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.

Section 21081.6 also provides general guidelines for implementing mitigation monitoring programs and indicates that specific reporting and/or monitoring requirements, to be enforced during project implementation, shall be defined as part of adopting a mitigated negative declaration.

To ensure that the mitigation measures are properly implemented, a monitoring program has been devised which identifies the timing and responsibility for monitoring each measure. Future project applicants will have the responsibility for implementing the measures that apply to development activity, and the various City of Los Altos departments will have the primary responsibility for monitoring and reporting the implementation of the mitigation measures.

The first column identifies mitigation measures that were identified in the IS-MND. The second column, entitled “Implementation Procedures,” identifies the procedures for implementing the mitigation measure. The third column “Monitoring and Reporting Actions,” refers to the monitoring action that must be taken to ensure the mitigation measure’s implementation. The fourth column, entitled “Monitoring Timing,” refers to when the monitoring will occur to ensure that the mitigation action is complete. The fifth column, “Responsible Agency,” refers to the agency responsible for oversight or ensuring that the mitigation measure is implemented. The “Compliance Verification” column is where the Responsible Agency verifies that the measures have been implemented.

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
Air Quality					
AQ-1: Individual Air Quality Analysis					
The City shall establish the following Standard Condition of Approval for projects requiring City approval: *For individual projects subject to CEQA that do not meet the BAAQMD construction and/or operational screening criteria under Table 6, individual air quality analysis shall be conducted to determine project significance. Where individual projects exceed BAAQMD significance thresholds detailed under Table 7, mitigation measures shall be incorporated to reduce emissions to below thresholds. Construction mitigation measures may include, but are not limited to, incorporation of Tier 4 and/or alternative fueled equipment, use of onsite power sources instead of generators, and use of low/no-VOC content architectural coatings. Operational mitigation measures may include, but are not limited to, increased incorporation of photovoltaic systems (PV) beyond regulatory requirements, increased incorporation of EV charging stations and/or infrastructure beyond regulatory requirements, incorporation of a development-wide ride-share system, or elimination of natural gas usage within residential developments. Individual project analysis and accompanying emission-reduction measures shall be approved by the City prior to issuance of a permit to construct or permit to operate.*	The City shall establish and apply a standard condition of approval requiring individual air quality analysis for projects that do not meet BAAQMD construction and/or operational screening criteria.	Verify that the standard condition of approval is established and applied; verify that individual air quality analysis is completed for projects that do not meet BAAQMD construction and/or operational screening criteria.	Prior to project approval.	City of Los Altos Planning Division	
AQ-2: Construction Emissions Measures					
The City shall establish the following Standard Condition of Approval for projects requiring City approval: *Project applicants shall comply with the current Bay Area Air Quality Management District's basic control measures for reducing construction emissions of PM10 (Table 8-2, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the May 2017 BAAQMD CEQA Guidelines), outlined below.*	The City shall establish and apply a standard condition of approval requiring the reduction of construction emissions.	Verify that the standard condition of approval is established and applied; verify that the project applicant complies with the current Bay Area Air	Prior to project approval.	City of Los Altos Planning Division	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
1. *All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times a day.* 2. *All haul trucks transporting soil, sand, or other loose material off-site shall be covered.* 3. *All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.* 4. *All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.* 5. *All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.* 6. *Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.* 7. *All construction equipment shall be maintained and properly tuned in accordance with manufacture's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper conditions prior to operation. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD's number shall also be visible to ensure compliance with applicable regulations.*		Quality Management District's basic control measures for reducing construction emissions of PM_{10}.			
AQ-3: Construction Health Risk Assessment					
The City shall establish the following Standard Condition of Approval for projects requiring City approval: *For individual projects where construction activities would last longer than two months and where construction would occur within 1,000 feet of*	The City shall establish and apply a standard condition of approval to require Tier 4 equipment and or	Verify that the standard condition of approval is established and applied; verify that Tier 4 equipment	Prior to project approval.	City of Los Altos Planning Division	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
sensitive receptors, Tier 4 equipment and/or alternative fuel construction equipment shall be used.	alternative fuel equipment be used for projects lasting longer than two months and where construction would occur within 1,000 feet of sensitive receptors.	and or alternative fuel equipment is used for projects lasting longer than two months and where construction would occur within 1,000 feet of sensitive receptors.			
Biological Resources					
BIO-1: Special-status Bat Species Avoidance and Minimization					
The City shall establish the following Standard Condition of Approval for projects requiring approval: *For projects that involve demolition of uninhabited buildings or removal of mature trees large enough to contain crevices and hollows that could support bat roosting, focused surveys to determine the presence/absence of roosting bats shall be conducted prior to demolition or tree removal. If active maternity roosts are identified, a qualified biologist shall establish avoidance buffers applicable to the species, the roost location and exposure, and the proposed construction activity in the area. If active non-maternity day or night roosts are found on the project site, measures shall be implemented to passively relocate bats from the roosts prior to the onset of construction activities. Such measures may include removal of roosting site during the time of day the roost is unoccupied or the installation of one-way doors, allowing the bats to leave the roost but not to re-enter. These measures shall be presented in a Bat Passive Relocation Plan that shall be submitted to, and approved by, CDFW.*	The City shall establish and apply a standard condition of approval to avoid and minimize effects to special-status bat species.	Verify that the standard condition of approval is established and applied; verify that focused bat surveys are conducted by a qualified biologist to determine the presence/absence of special status bat species.	Prior to project approval.	City of Los Altos Planning Division	
BIO-2: Biological Resources Screening and Assessment					
The City shall establish the following Standard Condition of Approval for projects requiring approval:	The city shall establish and apply a	Verify that the standard condition	Prior to project approval.	City of Los Altos	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
For projects on sites located on or adjacent to a creek, the project applicant shall hire a qualified biologist to perform a preliminary biological resources screening, for the City's review and approval, to determine whether the project has the potential to impact special status biological resources, inclusive of special status plants and animals, sensitive vegetation communities, jurisdictional waters (including creeks, drainages, streams, ponds, vernal pools, riparian areas and other wetlands), critical habitat, wildlife movement area, or biological resources protected under local or regional ordinances or an existing HCP or NCCP. If it is determined that the project has no potential to impact biological resources, no further action is required. *If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 50 feet around the project footprint, as is feasible, and to determine the potential impacts to those resources, as approved by the City. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, State, and/or federal agencies. If the project would have the potential to impact these resources, recommendations developed to enhance wildlife movement (e.g., installation of wildlife friendly fencing), as applicable, to reduce impacts to less than significant levels. Pending the results of the project-specific biological analysis, City review, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, NMFS, CDFW, and/or other local, State, and federal agencies may be required.*	standard condition of approval to screen for biological resources on the project site for projects requiring approval.	of approval is established and applied; verify that for projects on sites located on or adjacent to a creek, the project applicant has hired a qualified biologist to perform a preliminary biological resources screening.	.	Planning Division	
BIO-3: Jurisdictional Delineation					
The City shall establish the following Standard Condition of Approval for projects requiring approval:	The City shall establish and apply a standard condition	Verify that the standard condition of approval is	Prior to project approval.	City of Los Altos	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
If potentially jurisdictional waters and/or wetlands are identified by the project-specific analysis (as required by Mitigation Measure BIO-3), for projects on sites that are on or adjacent (within 200 feet) to a creek, a qualified biologist shall complete a jurisdictional delineation to determine the extent of the jurisdictions for CDFW, USACE, and/or RWQCB. This delineation shall be conducted in accordance with the requirements set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the City, USACE, RWQCB, and CDFW, as appropriate, for review and approval. Jurisdictional areas shall be avoided. If jurisdictional areas are expected to be impacted, then the RWQCB would require a Waste Discharge Requirements (WDRs) permit and/or Section 401 Water Quality Certification (depending upon whether the feature falls under federal jurisdiction). If CDFW asserts its jurisdictional authority, then a Streambed Alteration Agreement pursuant to Section 1600 et seq. of the CFGC would also be required prior to construction within the areas of CDFW jurisdiction. If the USACE asserts its authority, then a permit pursuant to CWA Section 404 would likely be required. Furthermore, a compensatory mitigation program shall be implemented in accordance with Mitigation Measure BIO-4 and the measures set forth by the aforementioned regulatory agencies during the permitting process. Compensatory mitigations for all permanent impacts to waters of the U.S. and waters of the state shall be completed at a ratio as required in applicable permits but shall not be less than a minimum ratio of 1:1. All temporary impacts to waters of the U.S. and waters of the State shall be fully restored to natural condition. The project applicant shall submit the report documenting restoration activities and monitoring to the City for review and approval.	of approval requiring a qualified biologist to complete a jurisdictional delineation for projects which have potentially jurisdictional waters and/or wetlands or a creek on site.	established and applied; verify that a qualified biologist completes a jurisdictional delineation if necessary.		Planning Division	
BIO-4: General Avoidance and Minimization					
The City shall establish the following Standard Condition of Approval for projects requiring approval: *Potential jurisdictional features on sites identified in jurisdictional delineation reports shall be avoided. Projects that may impact jurisdictional features shall include a report detailing how all identified jurisdictional*	The City shall establish and apply a standard condition of approval requiring the avoidance of	Verify that the standard condition of approval is established and applied; verify that	Prior to project approval.	City of Los Altos Planning Division	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
features will be avoided, including groundwater draw down. The project applicant shall submit this report to the City for review and approval prior to construction. • *Material/spoils generated from project activities shall be located away from jurisdictional areas or special-status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls (non- monofilament), covers, sand/gravel bags, and straw bale barriers, as appropriate.* • *Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank.* *Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative will be notified.*	potential jurisdictional features identified in jurisdictional delineation reports.	that jurisdictional features are avoided on site.			
BIO-5: Preconstruction Surveys for Nesting Birds					
The City shall establish the following Standard Condition of Approval for projects requiring City approval: *For projects that would involve native or naturalized vegetation or tree removal, a general pre-construction nesting bird survey shall be conducted by a qualified biologist within 14 days prior to the initiation of construction activities. If construction is stopped for more than 14 days during the nesting season, a pre-construction survey shall be conducted prior to the re-start of construction activities. Surveys shall include the disturbance area plus a 50-foot buffer for passerine species, and a 500-foot buffer for raptors.* *If active nests are located, an appropriate avoidance buffer shall be established within which no work activity would be allowed that would impact these nests. The avoidance buffer shall be established by the qualified biologist on a case-by-case basis based on the species and site conditions. Larger buffers may be required depending upon the status of*	The City shall establish and apply a standard condition of approval to avoid and minimize impacts to nesting birds that may be on the project site through surveying by a qualified biologist and the establishment of an avoidance buffer if active nests are found.	Verify that the standard condition of approval is established and applied; verify that a bird survey is conducted by a qualified biologist on the project site.	Prior to project approval.	City of Los Altos Planning Division	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until juveniles have fledged and/or the nest is inactive. A qualified biologist shall confirm that breeding/nesting is complete, and the nest is no longer active prior to removal of the buffer. If work within a buffer area cannot be avoided, then a qualified biologist shall be present to monitor all project activities that occur within the buffer. The biological monitor shall evaluate the nesting avian species for signs of disturbance and shall have the ability to stop work.					
Cultural Resources					
CUL-1: Archaeological Resources Assessment					
The City shall establish the following Standard Condition of Approval for projects requiring City approval: *Prior to approval of any individual development projects under the 2023-2031 Housing Element that will involve ground disturbance activities that may include, but are not limited to, grading and excavation, an archaeological resources assessment shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards in either prehistoric or historic archaeology. Assessments shall include a California Historical Resources Information System (CHRIS) records search at the Northwest Information Center (NWIC) and a Sacred Lands File Search maintained by the Native American Heritage Commission (NAHC). The records searches shall characterize the results of previous cultural resource surveys and disclose any cultural resources that have been recorded and/or evaluated in and around the project site. A Phase I pedestrian survey shall be undertaken in proposed project sites that are undeveloped to identify the presence or absence of any surface cultural materials. By performing a records search, a Sacred Lands File search, and a Phase I survey, a qualified archaeologist will classify the project site as having high, medium, or low sensitivity for archaeological resources.*	The City shall establish and apply a standard condition of approval requiring an archeological resources assessment be conducted on the proposed project site.	Verify that the standard condition of approval is established and applied; verify that an archaeological assessment of the proposed project site is conducted.	Prior to project approval.	City of Los Altos Planning Division	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
If the Phase I archaeological survey identifies resources that may be affected by the project, the archaeological resources assessment shall also include Phase II testing and evaluation. If resources are determined significant or unique through Phase II testing and site avoidance is not possible, appropriate site-specific mitigation measures shall be identified in the Phase II evaluation. These measures may include, but would not be limited to, a Phase III Data Recovery Program, avoidance, or other appropriate actions to be determined by a qualified archaeologist. If significant archaeological resources cannot be avoided, impacts may be reduced to less than significant by adding fill soils on top of the resources rather than cutting into the cultural deposits. Alternatively, and/or in addition, a data collection program may be warranted, including mapping the location of artifacts, surface collection of artifacts, or excavation of the cultural deposit to characterize the nature of the buried portions of sites. Curation of the excavated artifacts or samples would occur as specified by *the archaeologist in consultation with the City of Los Altos and with other relevant parties.*					
CUL-2: Unanticipated Discoveries of Archaeological Resources					
The City shall establish the following Standard Condition of Approval for projects requiring City approval: *In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities associated with the 2023-2031 Housing Element, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery*	The City shall establish and apply a standard condition of approval to provide guidance in the case that archaeological resources are unexpectedly encountered during ground-disturbing activities.	Verify that the standard condition of approval is established and applied; verify that all ground-disturbing activities are halted in the case that archeological resources are discovered on the project site.	Prior to project approval.	City of Los Altos Planning Division	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
plan tailored to the physical nature and characteristics of the resource, per the requirements of California Code of Regulations (CCR) Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City of Los Altos shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Guidelines Section 15126.4(b)(3)(C).					
Geology and Soils					
GEO-1: Protection of Paleontological Resources					
The City shall establish the following Standard Condition of Approval for projects requiring approval in areas of high paleontological sensitivity (Quaternary (Pleistocene) alluvial fan and fluvial deposits and Santa Clara Formation) and that involve ground disturbance below the level of past disturbance: **Paleontological Resources Assessment** *Prior to initial ground disturbance, the applicant shall retain a Qualified Professional Paleontologist, as defined by the SVP (2010), to conduct a paleontological resources assessment (PRA). The PRA shall determine the age and paleontological sensitivity of geologic formations underlying the proposed disturbance area, consistent with SVP (2010) guidelines for categorizing paleontological sensitivity of geologic units within a project area.* *If underlying formations are found to have a high potential for paleontological resources, the Qualified Professional Paleontologist shall create a Paleontological Mitigation and Monitoring Program, which will be approved by the City and contain the following elements:*	The City shall establish and apply a standard condition of approval to protect paleontological resources.	Verify that the standard condition of approval is established and applied; verify that a paleontological resources assessment is completed and a Paleontological Worker Environmental Awareness Program is carried out.	Prior to project approval.	City of Los Altos Planning Division	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
Paleontological Worker Environmental Awareness Program (WEAP) *Prior to the start of construction, the Qualified Professional Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and procedures for notifying paleontological staff should fossils be discovered by construction staff.* **Paleontological Monitoring** *Full-time paleontological monitoring shall be conducted during ground disturbing construction activities (i.e., grading, trenching, foundation work) in sediments assigned a high paleontological sensitivity. Paleontological monitoring shall be conducted by a qualified Paleontological Resources Monitor, as defined by the SVP (2010). The duration and timing of the monitoring will be determined by the Qualified Professional Paleontologist based on the observation of the geologic setting from initial ground disturbance, and subject to the review and approval by the City. If the Qualified Professional Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions once the full depth of excavations has been reached, they may recommend that monitoring be reduced to periodic spot-checking or ceased entirely. Monitoring shall be reinstated if any new ground disturbances are required, and reduction or suspension shall be reconsidered by the Qualified Professional Paleontologist at that time. In the event of a fossil discovery by the paleontological monitor or construction personnel, all work in the immediate vicinity of the find shall cease. A Qualified Professional Paleontologist shall evaluate the find before restarting construction activity in the area. If it is determined that the fossil is scientifically significant, then it shall be salvaged, identified to the lowest possible taxonomic level, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps.* *Upon completion of ground disturbing activity (and curation of fossils if necessary) the Qualified Professional Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils					

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to the City. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.					
Hazards and Hazardous Materials					
HAZ-1: Database Review and Investigation					
The City shall establish the following Standard Condition of Approval for projects requiring approval: *Prior to issuance of a grading permit, the SWRCB's GeoTracker database and DTSC's EnviroStor database shall be consulted by City staff or consultant to determine whether or not the site to be graded is within 500 feet of an identified active hazardous material site.* *If the site is identified in the GeoTracker or EnviroStor databases within 500 feet of an identified active hazardous material site, or if the site to be graded is located on a site that:* • *Was currently and/or historically used for railroad, agricultural, or industrial uses.* • *Was previously or is currently utilized to store, handle, and/or generate hazardous materials.* • *Has unknown previous site uses; and/or* • *Was previously or is currently utilized as a manufacturing facility, a gasoline station, automobile repair shop (or similar), or dry cleaner,* *The following process shall be followed prior to issuance of a grading permit:* • *The project applicant shall retain a qualified environmental professional (Professional Geologist or Professional Civil Engineer) to prepare a Phase I ESA in accordance with current ASTM standards.* • *If the Phase I ESA identifies any potential contamination sources, the project applicant shall retain a qualified environmental consultant to prepare a Phase II ESA (subsurface investigation) to determine whether the identified potential sources have resulted in soil,*	The City shall establish and apply a standard condition of approval outlining the process that shall be followed prior to issuance of a grading permit including the requirement that the GeoTracker and EnviroStar databases are consulted.	Verify that the standard condition of approval is established and applied; verify that evidence of regulatory database review and investigation has been provided by the project applicant.	Prior to project approval.	City of Los Altos Planning Division	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
groundwater, or soil vapor contamination exceeding regulatory action levels. • *If the Phase II ESA identifies contamination exceeding applicable regulatory screening levels for construction workers and future site users published by the Regional Water Quality Control Board (RWQCB), Department of Toxic Substances Control (DTSC), and/or Environmental Protection Agency (EPA), a Soil Management Plan shall be prepared (see HAZ-2).* • *If the Phase II ESA identifies contamination exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), remediation shall be conducted (see HAZ-3).* *The project applicant shall provide written evidence of regulatory database review and investigation. The City of Los Altos shall ensure that evidence of regulatory database review and investigation has been provided by the project applicant prior to project approval.*					
HAZ-2: Soil Management Plan for Impacted Soils					
The City shall establish the following Standard Condition of Approval for projects requiring City approval: *If impacted soils or other impacted wastes are present at the project site, the project applicant shall retain a qualified environmental professional to prepare a Soil Management Plan (SMP) prior to construction. The SMP, or equivalent document, shall be prepared to address onsite handling and management of impacted soils or other impacted wastes and reduce hazards to construction workers and offsite receptors during construction. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. These measures and practices may include, but are not limited to:* • *Stockpile management including stormwater pollution prevention and the installation of BMPs*	The City shall establish and apply a standard condition of approval requiring a Soil Management Plan for sites that have impacted soils or other impacted wastes.	Verify that the standard condition of approval is established and applied; verify that a soil management plan is established by a qualified environmental professional If impacted soils or other impacted wastes are present at the project site.	Prior to project approval.	City of Los Altos Planning Division	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
• *Guidance regarding proper disposal procedures of contaminated materials* • *Guidance regarding monitoring, reporting, and regulatory agency notification* • *A health and safety plan (HASP) for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection* • *The HASP shall also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.* *The project applicant shall prepare and implement a written Soil Management Plan and ensure that an appropriate regulatory oversight agency, such as Santa Clara County Department of Environmental Health, reviews and approves the development site Soil Management Plan, HASP, and remedial measures for impacted soils*. *The City of Los Altos shall ensure that a written Soil Management Plan, HASP, and remedial measures for impacted soils has been prepared and approved prior to issuance of a grading permit*.					
HAZ-3: Remediation					
The City shall establish the following Standard Condition of Approval for projects requiring City approval: *If soil present within the construction envelope at the development site contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project applicant shall retain a qualified environmental consultant (PG or PE), to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary.* *The qualified environmental consultant shall use the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted*	The City shall establish and apply a standard condition of approval requiring a Soil Management Plan for sites that have impacted soils or other impacted wastes.	Verify that the standard condition of approval is established and applied; verify that the project applicant has retained a qualified environmental professional to create a Soil Management Plan for sites that have	Prior to project approval.	City of Los Altos Planning Division	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
wastes. The qualified environmental consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate. *The project applicant or their contractors shall provide evidence that remediation reduced contaminant levels to below applicable federal, State, and local regulations for human and environmental health, and below hazardous materials threshold concentrations. Evidence of compliance may include, but is not limited to, notifying the appropriate oversight agency (e.g., SCCDEH) of the contamination, hiring a qualified environmental professional to conduct the necessary assessments and abatement (including soil sampling, preparing a remediation plan to adequately abate the hazardous materials, and ultimately obtaining necessary clearance letters from the oversight agency), and issuance of a No Further Action letter, if applicable.* *City of Los Altos shall ensure that evidence of remediation compliance has been provided by the project applicant, prior to issuing an occupancy permit.*		impacted soils or other impacted wastes.			
Noise					
NOI-1: Construction Noise Reduction Measures					
The City shall establish the following Standard Condition of Approval for projects requiring City approval: *For development projects involving construction within 50 feet of sensitive receivers, the applicant shall develop a site-specific Construction Noise Reduction Program prepared by a qualified acoustical consultant to reduce construction noise impacts to the maximum extent feasible, subject to review and approval of the Planning Director in advance of issuance of building permits. The following measures to minimize exposure to construction noise shall be included:* 1. ***Mufflers**. During excavation and grading construction phases, all construction equipment, fixed or mobile, shall be operated with closed*	The City shall establish and apply a standard condition of approval requiring a Construction Noise Reduction Program for projects involving construction within 50 feet of sensitive receivers.	Verify that the standard condition of approval is established and applied; verify that the project applicant develops a Construction Noise Reduction Program.	Prior to project approval.	City of Los Altos Planning Division	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards. 2. ***Air compressors**. Utilize "quiet" models of air compressors and other stationary noise sources to the greatest extent practicable. Select hydraulically or electrically powered equipment and avoid pneumatically powered equipment where feasible.* 3. ***Pile driving**. If pile driving is required, pre-drill foundation pile holes to minimize the number of impacts required to seat the pile. Examine whether the use of sonic pile driving is feasible and quieter. If so, utilize that method.* 4. ***Stationary Equipment**. All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receivers. Construct temporary noise barriers or partial enclosures to acoustically shield such equipment to the maximum extent feasible.* 5. ***Equipment Staging Areas**. Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receivers.* 6. ***Smart Back-up Alarms**. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.* 7. ***Perimeter Noise Reduction.** Construct solid plywood fences around construction sites adjacent to operational business, residences or other noise-sensitive land uses where the noise control plan analysis determines that a barrier would be effective at reducing noise.* 8. ***Signage**. For the duration of construction, the applicant or contractor shall post a sign in a construction zone that includes contact information for any individual who desires to file a noise complaint.*					

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
NOI-2: Vibration Control Plan					
The City shall establish the following Standard Condition of Approval for projects requiring City approval: *For projects involving vibratory rollers within 25 feet of a historic structure, and/or the use of pile drivers, the applicant shall prepare a Vibration Control Plan prior to the commencement of construction activities. The Vibration Control Plan shall be prepared by a licensed structural engineer and shall include methods to minimize vibration, including, but not limited to:* • *Use of drilled piles or similar method (e.g., cast-in-place systems) rather than pile driving* • *Use of resonance-free vibratory pile drivers/rollers* • *Avoiding the use of vibrating equipment when allowed by best engineering practices* *The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions of buildings within a 50-foot radius as well as at potentially affected extremely fragile buildings/historical resources and/or residential structures within the vicinity of the construction site. The condition of existing potentially affected properties shall be documented by photos and description of existing condition of building facades, noting existing cracks. The survey letter shall provide a shoring design to protect such buildings and structures from potential damage. At the conclusion of vibration causing activities, the qualified structural engineer hired by the applicant shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed by the contractor and monitored by a qualified structural engineer in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).* *A Statement of Compliance signed by the applicant and owner is required to be submitted to the City Building Department at plan check and prior to*	The City shall establish and apply a standard condition of approval requiring the applicant to prepare a vibration control plan prior to the commencement of construction activities.	Verify that the standard condition of approval is established and applied; verify that the project applicant prepares a vibration control plan.	Prior to project approval.	City of Los Altos Planning Division	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
the issuance of any permit. The Vibration Control Plan, prepared as outlined above, shall be documented by a qualified structural engineer, and shall be provided to the City upon request. A Preservation Director shall be designated, and this person's contact information shall be posted in a location near the project site that it is clearly visible to the nearby receivers most likely to be disturbed. The Director will manage complaints and concerns resulting from activities that cause vibrations. The severity of the vibration concern should be assessed by the Director, and if necessary, evaluated by a qualified noise and vibration control consultant.					
Transportation					
TRA-1: Vehicle Miles Traveled (VMT) Reduction Mitigation for APN #18956014 and #31801036					
The City shall require the following Standard Condition of Approval for projects on APN #18956014 and #31801036: *Prior to issuance of a building permit, the project applicant shall demonstrate VMT reduction using the Santa Clara County VMT Evaluation Tool for implementing Tier 1 through Tier 3 VMT mitigation measures:* ▪ ***Tier 1:*** *Project characteristics that encourage walking, biking, and transit uses.* ▪ ***Tier 2:*** *Multimodal network improvements that increase accessibility for transit users, bicyclists, and pedestrians. These improvements include:* o *Increase bike access* o *Improve connectivity by increasing intersection density* o *Increase transit accessibility* o *Traffic calming measures beyond the project frontage* o *Pedestrian network improvements beyond the project frontage* ▪ ***Tier 3:*** *Parking measures that discourage personal motorized vehicle trips. These improvements include:* o *Limit parking supply*	The City shall establish and apply a standard condition of approval requiring the project applicant to demonstrate VMT reduction using the Santa Clara County VMT Evaluation Tool for implementing Tier 1 through Tier 3 VMT mitigation measures.	Verify that the standard condition of approval is established and applied; verify that the project applicant reduces VMT for projects on APN #18956014 and #31801036	Prior to project approval.	City of Los Altos Planning Division	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
○ *Provide bike facilities* *The City of Los Altos shall review project plans to ensure that the appropriate VMT mitigation measures are implemented prior to project approval.*					
TRA-2: VMT Reduction Mitigation for APN #31816022, #32601052, #32601053, and #33609018					
The City shall require the following Standard Condition of Approval for projects on #31816022, #32601052, #32601053, and #33609018: *Prior to issuance of a building permit, the project applicant shall demonstrate VMT reduction using the Santa Clara County VMT Evaluation Tool for implementing Tier 1 through Tier 4 VMT mitigation measures:* ▪ ***Tier 1:*** *Project characteristics that encourage walking, biking, and transit uses.* ▪ ***Tier 2:*** *Multimodal network improvements that increase accessibility for transit users, bicyclists, and pedestrians. These improvements include:* ○ *Increase bike access* ○ *Improve connectivity by increasing intersection density* ○ *Increase transit accessibility* ○ *Traffic calming measures beyond the project frontage* ○ *Pedestrian network improvements beyond the project frontage* ▪ ***Tier 3:*** *Parking measures that discourage personal motorized vehicle trips. These improvements include:* ○ *Limit parking supply* ○ *Provide bike facilities* ▪ ***Tier 4:*** *Transportation Demand Management (TDM) measures that provide incentives and services to encourage alternatives to personal motorized vehicle trips. These measures for residential developments include:* ○ *School pool programs* ○ *Bike share programs*	The City shall establish and apply a standard condition of approval requiring the project applicant to demonstrate VMT reduction using the Santa Clara County VMT Evaluation Tool for implementing Tier 1 through Tier 4 VMT mitigation measures.	Verify that the standard condition of approval is established and applied; verify that the project applicant reduced VMT for projects on APN #31816022, #32601052, #32601053, and #33609018.	Prior to project approval.	City of Los Altos Planning Division	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
○ *Car share programs* ○ *Subsidized transit program* ○ *Unbundle parking costs from property costs* ○ *Voluntary travel behavior change program* *The City of Los Altos shall review project plans to ensure that the appropriate VMT mitigation measures are implemented prior to project approval. TDM measures shall be enforced through annual trip monitoring to assess the project's status in meeting the VMT reduction goals.*					
Tribal Cultural Resources					
TCR-1: Suspension of Work Around Potential Tribal Cultural Resources					
The City shall establish the following Standard Condition of Approval for projects requiring City approval: *In the event that archaeological resources of Native American origin are identified during implementation of the proposed project, all earth-disturbing work within 50 feet of the find shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City of Los Altos, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with local Native American group(s). The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery. The City of Los Altos Community Development Director or designee shall review and approve the plan prior to implementation.*	The City shall establish and apply a standard condition of approval requiring the suspension of all earth-disturbing work in the case that archaeological resources of Native American origin are identified during implementation of the proposed project.	Verify that the standard condition of approval is established and applied; verify that all earth-disturbing work is suspended if archaeological resources of Native American origin are identified during implementation of the proposed project.	Prior to project approval.	City of Los Altos Planning Division	

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RESOLUTION NO. PC 2023-01

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF LOS ALTOS RECOMMENDING THAT THE CITY COUNCIL ADOPT THE SIXTH CYCLE HOUSING ELEMENT UPDATE

WHEREAS, the California Legislature has determined that the availability of housing is a matter of statewide importance and that cooperation between government and the private sector is critical to attainment of the State's housing goals; and

WHEREAS, California Government Code Section 65588(b) requires the City of Los Altos to periodically prepare an update to the Housing Element of its General Plan; and

WHEREAS, the City Council directed the Development Services Director to cause the Development Services Director to proceed with this update to the City's Housing Element for the 2023-2031 planning period; and

WHEREAS, the City of Los Altos prepared the draft 2023-2031 Housing Element in accordance with California Housing Element Law (Government Code Section 65580 et esq.); and

WHEREAS, California Government Code Section 65583 requires that the Housing Element Update contain: (i) an assessment of the City's housing needs and an analysis of the resources and constraints, both governmental and non-governmental, relevant to the meeting of these needs; (ii) an inventory of land suitable and available for residential development and an analysis of the development potential of such sites; (iii) a statement of the community's goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing; and (iv) programs that set forth a schedule of actions the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element Update; and

WHEREAS, the City's share of the regional housing need was established in the Regional Housing Needs Assessment Plan prepared and adopted by the Association of Bay Area Governments (ABAG) on December 16, 2021. The allocation establishes the number of new units needed, by income category, to accommodate expected population growth over the planning period of the Housing Element; and

WHEREAS, Housing Element Law requires the Housing Element to identify adequate sites to accommodate the City's Regional Housing Needs Allocation (RHNA) for all income categories, and the Housing Element Update identifies sites that can accommodate housing exceeding the City's RHNA; and

WHEREAS, in accordance with Government Code Section 65585(b), the City on August 12, 2022 submitted a draft Housing Element to the California Department of Housing and

Community Development (HCD); and received a letter from HCD dated November 10, 2022, which provided the City's draft Housing Element with comments that required revisions to comply with Housing Element Law; and

WHEREAS, the City Council considered the comments received from HCD at a Study Session on November 29, 2022 and provided direction on responses to HCD's comments; and

WHEREAS, the City incorporated revisions into Housing Plan Update 2023-2031 in response to HCD's letter dated November 10, 2022 to ensure that the Housing Element would substantially comply with Housing Element Law; and

WHEREAS, an Initial Study and Mitigated Negative Declaration for the 2023-2031 Housing Element was prepared pursuant to California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et esq., CEQA Guidelines Section 15070, and the City of Los Altos local process for implementing CEQA, assessing the potential environmental impacts that might result from the adoption of the 2023-2031 Housing Element, a Mitigated Negative Declaration (MND) was prepared to address potential environmental impacts; and

WHEREAS, The Planning Commission considered Public Testimony regarding the Initial Study and Mitigated Negative Declaration for the 2023-2031 Housing Element as required by law; and

WHEREAS, the City conducted substantial and broad public engagement using a methodical process including 1) the establishment of a Housing Element page on the City's website, through which the city has received input directly from residents and businesses; 2) six Housing Element pop-up events; 3) ongoing small group virtual meetings on the Housing Element, ranging from 2 to 10 attendee; 4) two double page ads in the Town Crier; 5) Housing Element newsletters and alerts for over 200 persons; 6) two Community Workshops, over two hundred attendees; 7) informational flier sent to every household in Los Altos; and five banners (8' by 3') posted on varies City Buildings and street corners advertising the Housing Element Update website and opportunity for continued public input; and

WHEREAS, the Planning Commission held a duly noticed public hearing on January 2, 2023, as prescribed by law. Evidence was submitted to and considered by the Planning Commission, including, without limitation:

a) Written information including written and graphical information posted on the Project website, including without limitation public comments submitted to HCD and City, all of which are incorporated by this reference as though fully set forth herein.
b) Materials created for public engagement and study session agenda reports.
c) Oral testimony from City staff, interested parties and the public.
d) The staff report dated January 5, 2023, which along with attachments, are incorporated herein by reference as though fully set forth herein, as are staff reports

and presentations prepared for related study sessions, which occurred during the life of the Project.

e) Additional information submitted during the public hearing; and

WHEREAS, the Planning Commission recommended modification to Program 3.H of the draft Housing Element to reflect the allowance of 14 calendar days post project approval to file an appeal instead of the proposed 10 calendar days.

NOW, THEREFORE, BE IT RESOLVED that the Los Altos Planning Commission, in its independent judgment and after fully considering all alternatives, hereby declares that:

SECTION 1. The foregoing recitations are true and correct and are incorporated by reference into this action.

SECTION 2. The amendment to the Housing Element of the General Plan substantially complies with Housing Element Law, as provided in Government Code 65580 et. seq. The proposed amendments are required to bring the Housing Element into consistency with State law and are consistent with sound planning principles in that the proposed policies and proposed implementing regulations are compatible and ensure that the goals and policies of the General Plan can be adequately implemented.

SECTION 3. There is a real and substantial relationship of the Los Altos Housing Element to the general welfare of the City and the entire region. Los Altos has adequately researched and considered the numerous competing interests in the region and, in view of the demonstrated need for new housing, the approval constituted a reasonable accommodation of those interests.

PASSED AND ADOPTED this 5th day of January, 2023 by the following vote, to wit:

AYES: AHI, BENINATO, DISENY, DORAN, MENSIGNER, ROCHE, STEINLE
NOES:
ABSTAIN:
ABSENT:

ATTEST:

Stephanie Williams

Stephanie Williams, AICP
Staff Liaison

Susan Mensinger, Chair

LEAGUE OF WOMEN VOTERS®
OF LOS ALTOS-MOUNTAIN VIEW AREA

January 3, 2023
Chair Mensinger and Members of the Los Altos Planning Commission

Re: Agenda Item # 2 – Sixth Cycle Housing Element 2023-2031

Dear Chair Mensinger and Members of the Planning Commission:

As we have written earlier, the LWV supports a comprehensive plan to address housing that follows State law, and we commend the Staff and LWC for recommending changes to the Draft Housing Element (HE) that hopefully will lead to having a compliant HE. The LWV also supports policies and programs to provide a decent home for every American and Californian, including subsidies at all government levels to produce this housing.

Our greatest concern with the proposed revisions is Program 1.H. We are pleased that the timeline for implementing a program to encourage housing on City-owned Parking Plazas 7 and 8 has been expedited. Nonetheless, the program as described in the current HE does not prioritize the development of affordable housing on these sites, which we believe is important.

Because Los Altos has no affordable housing funds, unlike neighboring cities, the main contribution our City can make to incentivize affordable housing is to make the land free, or nearly free, for a term of 55 years or more, long enough to make a tax credit project feasible, as this is the main financing mechanism for most current affordable housing. The offer of a zero-cost land lease for 20 years to a market-rate developer providing 20% of the units to lower-income households does not incentivize more affordable housing than baseline inclusionary zoning requirements. Our below-market-rate (BMR) ordinance already requires a market-rate developer to provide 20% of the units as BMRs if they are rentals, (or 15% very low-income) so there is no added benefit to the City in this scenario.

We agree that the City should waive development impact fees for an all-affordable project, as it did with 330 Distel Circle, but it's not clear why the City should waive applicable permit fees for a market-rate development on the Parking Plazas that includes the number of BMRs required by our ordinance already. We also do not think the City should be prioritizing housing for seniors, persons with disabilities and veterans without having completed a survey of what the needs are for various housing types.

We are pleased to see that the revised HE proposes amending SB 9 and ADU ordinances ASAP to be compliant with State law. And we support earlier timelines for many programs, as HCD suggested. We commend the specific height increases for the CT and mixed-use zones. We support zoning changes for the OA District, although we prefer consistency, rather than the spot zoning recommended.

We commend the simplification of the permitting process but would prefer to see some type of metrics/measurement built into the program to monitor how much the process is actually streamlined, instead of the proposed language in 3.H, “the time...will be shortened….”

We believe that the State-mandated upzoning due to AB 2011 will allow more housing, but we would like the City to provide evidence of the impact of AB 2011. Nonetheless, this along with the zoning changes recommended in this HE version, the City’s site inventory should be sufficient, although we think that Foothill Crossings, See’s Candy site on El Camino Real, and perhaps other parcels, should be removed due to indications from the property owners that they have no interest in developing housing.

Finally, we acknowledge that the revised HE attempts to satisfy the requirements of Affirmatively Furthering Fair Housing, particularly in the future by hiring a Housing Manager, but we believe the City has not really met the intent of this new statutory requirement (to “overcome patterns of segregation” already extant in our City), just as many cities have not. Building an all-affordable housing development for low-income households on a Parking Plaza in the center of our downtown would be great step forward in Affirmatively Furthering Fair Housing.

(Please send any questions about this email to Sue Russell at housing@lwvlamv.org)

Karin Bricker, President LWV of Los Altos/Mountain View Area
Cc: Gabe Engeland Nick Zornes Angel Rodriguez

From: Anne Paulson
To: Public Comment - PC
Cc: Nick Zornes; Stephanie Williams
Subject: 1/5/23 meeting: Comment on Item 2, Housing Element
Date: Tuesday, January 3, 2023 8:51:46 PM

January 3, 2023

To the Planning Commission:

The Los Altos Affordable Housing Alliance supports housing for all ages and all life stages in our community. We applaud City staff for their prompt turnaround of the new draft Housing Element. We appreciate that staff and our consultant have attempted to address HCD's comments. A couple of issues still need to be dealt with.

Program 1.H, Housing on the parking plazas

Our chief concern is the new language with respect to the parking plazas. The revised Housing Element draft proposes an RFP for housing on plaza 7 or 8. The successful applicant, either a for-profit developer or an applicant proposing an all-affordable project, would receive a free lease of city land for 20 years. The draft mentions all-affordable projects, senior housing or veterans' housing as being candidates for parking plaza housing.

First of all, we believe the first parking plaza project should be an all-affordable housing project. The City needs affordable housing, but affordable developers are unlikely to be able to buy land in Los Altos. As with 330 Distel, an affordable developer is going to need the land to be donated. The City of Los Altos doesn't have much public land; a parking plaza is our best chance for another affordable project.

In addition to providing desperately needed affordable housing in our community, an all-affordable project on a parking plaza would satisfy several legal requirements. We are required by law to ameliorate past segregation, and there would be no better way to do that than putting an affordable project in the heart of the city. The affordable project would satisfy a solid chunk of our RHNA at whatever income levels were chosen. Lower-income households have fewer cars, and do less driving, than higher-income households, so we would be satisfying our VTA goals as well.

But a twenty-year free lease plus fee waivers is not enough to make an affordable project feasible. An affordable project would need at least 55 years with very favorable terms. After all, the only all-affordable project in our City, 330 Distel, was given their land for free.

Meanwhile, giving free use of City land to a market-rate developer for any length of time is unnecessarily generous. As we see from the many projects being approved and built on First Street, developers can build market-rate housing downtown without any financial help from the City. If a market-rate developer is to use our parking plaza for a housing development, they should have to buy or lease the land at market rate. We think the city should prioritize all-affordable housing developments on parking plazas, but if there is a market-rate development there, it should not get special concessions.

Program 1.C, **OA zoning**

The original draft of the Housing Element called for upzoning all of the OA zone, which includes the commercial area on San Antonio across from downtown, as well as the small offices on Altos Oaks Drive and a few parcels on Fremont Avenue near El Monte. The draft submitted to HCD changed this, so that only the parcels in the site inventory would be upzoned.

We do not support spot upzoning. Spot upzoning makes the zoning code more complex, at a time when the city is supposed to be removing constraints to housing production rather than introducing more of them. Moreover, the sites in the OA zone that front on San Antonio but are not listed on the site inventory are going to be upzoned in July anyway, as a result of AB 2011, no matter what the city does, and the sites on Altos Oaks that are ripe for development are listed on the site inventory and will be upzoned. Thus, spot upzoning instead of upzoning the whole OA zone would add complexity to our zoning code, without any advantage to the city. We believe the City should return to the initial plan of upzoning all of OA.

We are confident that staff, the Planning Commission and the City Council can deal with these issues, as well other minor issues, and promptly get the Housing Element revised, adopted and sent to HCD.

Respectfully,
The Los Altos Affordable Housing Alliance Steering Committee

CITY COUNCIL RESOLUTION NO. 2023-XX

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LOS ALTOS, CALIFORNIA, ADOPTING A GENERAL PLAN AMENDMENT TO REPEAL THE 2015-2023 HOUSING ELEMENT AND ADOPT THE HOUSING ELEMENT OF THE GENERAL PLAN FOR THE PERIOD OF 2023-2031 AND MITIGATED NEGATIVE DECLARATION IN COMPLIANCE WITH STATE HOUSING ELEMENT LAW AND THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

WHEREAS, the California Legislature has found that "California has a housing supply and affordability crisis of historic proportions. The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the state's environmental and climate objectives" (Gov. Code Section 65589.5.); and

WHEREAS, the Legislature has further found that "Among the consequences of those actions are discrimination against low-income and minority households, lack of housing to support employment growth, imbalance in jobs and housing, reduced mobility, urban sprawl, excessive commuting, and air quality deterioration" (Gov. Code Section 65589.5.); and

WHEREAS, the Legislature recently adopted the Housing Crisis Act of 2019 (SB 330) which states that "In 2018, California ranked 49th out of the 50 states in housing units per capita… California needs an estimated 180,000 additional homes annually to keep up with population growth, and the Governor has called for 3.5 million new homes to be built over 7 years"; and

WHEREAS, State Housing Element Law (Government Code Sections 65580 et seq.) requires that the City Council adopt a Housing Element for the eight-year period 2023-2031 to accommodate the City of Los Altos, California regional housing need allocation (RHNA) of 1,958 housing units, comprised of 501 very-low-income units, 288 low-income units, 326 moderate-income units, and 843 above moderate-income units; and

WHEREAS, to comply with State Housing Element Law, the City of Los Altos, California has prepared Housing Element 2023-2031 (the Housing Element) in compliance with State Housing Element Law and has identified sites that can accommodate housing units meeting the City's RHNA; and

WHEREAS, as provided in Government Code Section 65350 et. seq., adoption of the Housing Element constitutes a General Plan Amendment; and

WHEREAS, an Initial Study and Mitigated Negative Declaration for the 2023-2031 Housing Element was prepared pursuant to California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et esq., CEQA Guidelines Section 15070, and the City of Los Altos local process for implementing CEQA, assessing the potential environmental impacts that might

result from the adoption of the 2023-2031 Housing Element, a Mitigated Negative Declaration (MND) was prepared to address potential environmental impacts;

WHEREAS, as provided in Government Code Sections 65352 – 65352.5 the City mailed a public notice to all California Native American tribes provided by the Native American Heritage Commission and to other entities listed; and

WHEREAS, No California Native American tribe requested consultation; and

WHEREAS, the City conducted substantial and broad public engagement using a methodical process including 1) the establishment of a Housing Element page on the City's website, through which the city has received input directly from residents and businesses; 2) six Housing Element pop-up events; 3) ongoing small group virtual meetings on the Housing Element, ranging from 2 to 10 attendee; 4) two double page ads in the Town Crier; 5) Housing Element newsletters and alerts for over 200 persons; 6) two Community Workshops, over two hundred attendees; 7) informational flier sent to every household in Los Altos; and five banners (8' by 3') posted on varies City Buildings and street corners advertising the Housing Element Update website and opportunity for continued public input; and

WHEREAS, in accordance with Government Code Section 65585 (b), on June 22, 2022 the Housing Element was posted, the City posted the draft Housing Element and requested public comment for a 30-day review period, and on August 12, 2022 the draft Housing Element was submitted to HCD, after responding to public comments, the City submitted the draft Housing Element to the State Department of Housing and Community Development (HCD) for its review; and

WHEREAS, on November 10, 2022, the City received a letter from HCD providing its findings regarding the draft Housing Element; and

WHEREAS, on November 30, 2022, the City released the draft Initial Study and Mitigated Negative Declaration for a public comment period of 30-days; and

WHEREAS, on December 29, 2022, the City published a revised draft Housing Element responding to HCD's findings and requested public comment on the draft; and

WHEREAS, on December 30, 2022, the City closed the public comment period for the draft Initial Study and Mitigated Negative Declaration and considered all public comments received; and

WHEREAS, on January 5, 2023, the Planning Commission held a duly and properly noticed public hearing and recommended that the City Council adopt the Housing Element and Initial Study and Mitigated Negative Declaration; and

WHEREAS, on January 10, 2023, the City Council held a duly and properly noticed public hearing to take public testimony and consider this Resolution regarding the proposed Housing Element, reviewed the Housing Element and all pertinent maps, documents and exhibits, including HCD's findings, the City's response to HCD's findings, the staff report and all attachments, and oral and written public comments; and

WHEREAS, on January 10, 2023, the City Council at a duly and properly noticed public hearing directed the Development Services Director to make necessary changes to the draft housing element based on public testimony received, and City Council direction; and

WHEREAS, on January 10, 2023, the City Council continued the housing element agenda time to a separately noticed public hearing on January 24, 2023 to provide staff with the necessary time to revise the draft housing element and return to the City Council for final consideration; and

WHEREAS, on January 24, 2023, the City Council held a duly and properly noticed public hearing to take public testimony and consider this Resolution regarding the proposed Housing Element, reviewed the Housing Element and all pertinent maps, documents and exhibits, including HCD's findings, the City's response to HCD's findings, the staff report and all attachments, and oral and written public comments;

NOW, THEREFORE, BE IT RESOLVED, that the City Council hereby finds that, based on substantial evidence in the record:

SECTION 1. The foregoing recitals are true and correct and are incorporated by reference into this action.

SECTION 2. The Housing Element substantially complies with Housing Element Law, as provided in Government Code 65580 et seq., and contains all provisions required by State Housing Element Law, as shown in Attachment A to this resolution, incorporated herein.

SECTION 3. Based on substantial evidence in the record, based on the age, and in some cases, the declining or deteriorating conditions of primarily non-residential structures located on non-vacant sites, as well as the likelihood of commercial uses on non-vacant sites converting to mixed-use residential development due to the continued decline of existing retail-only uses, as well as the currently moderate commercial use vacancy rates in the City; together with recent regional development trends (where conversion of non-residential uses on non-vacant sites to housing development to accommodate a range of household types such as multi-family and smaller unit sizes), the documented interest in recent years from developers and land owners; the lack of developable vacant sites in the City; and the existing uses on the sites identified in the site inventory to accommodate RHNA are likely to integrate with new residential uses, or discontinue during the planning period; the existing uses on the non-vacant sites identified in the site inventory to accommodate the RHNA are likely to be discontinued during the planning period and therefore

do not constitute an impediment to planned residential development on the site during the planning period.

SECTION 4. As required by Government Code Section 65585(e), the Los Altos City Council has considered the findings made by the Department of Housing and Community Development included in the Department's letter to the City of Los Altos dated November 10, 2022, consistent with Government Code Section 65585(f), and as described in Attachment B to this resolution, incorporated herein, the Los Altos City Council has changed the Housing Element in response to the findings of the Department to substantially comply with the requirements of State Housing Element Law as interpreted by HCD.

SECTION 5. That exercising its independent judgement, the City Council approves the Initial Study and Mitigated Negative Declaration for the 2023-2031 Housing Element Attachment D and IS-MND Mitigation Monitoring and Reporting Program Attachment E.

SECTION 6. The City of Los Altos 2015-2023 Housing Element is hereby repealed in its entirety, and the City of Los Altos 6th Cycle Housing Element 2023-2031, as shown in Attachment C to this Resolution, incorporated herein, is adopted.

SECTION 7. This Resolution shall become effective upon adoption by the Los Altos City Council.

SECTION 8. The Development Services Director, Nick Zornes is hereby directed to file all necessary material with the Department of Housing and Community Development for the Department to find that the Housing Element is in conformance with State Housing Element Law and is further directed and authorized to make all non-substantive changes to the Housing Element to make it internally consistent or to address any non-substantive changes or amendments requested by the Department to achieve certification.

SECTION 9. The Development Services Director, Nick Zornes is hereby directed to distribute copies of the Housing Element in the manner provided in Government Code Sections 65357 and 65589.7.

I HEREBY CERTIFY that the foregoing is a true and correct copy of a Resolution passed and adopted by the City Council of the City of Los Altos at a meeting thereof on the ___ day of ____, 2021 by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____

Sally Meadows, Mayor

Attest:

_____

Angel Rodriguez, Interim City Clerk

ATTACHMENTS:

Attachment A: Compliance with Statutory Provisions.

Attachment B: Findings Responding to Letter from Department of Housing and Community Development dated November 10, 2022.

Attachment C: 2023 – 2031 Housing Element.

Attachment D: Initial Study and Mitigated Negative Declaration for the 2023-2031 Housing Element.

Attachment E: IS-MND Mitigation Monitoring and Reporting Program

1 North San Antonio Road
Los Altos, California 94022-3087

M E M O R A N D U M

DATE: January 9, 2023

TO: Los Altos City Council

FROM: Nick Zornes, Development Services Director

SUBJECT: **6TH CYCLE HOUSING ELEMENT (2023-2031)**
JANUARY 5, 2023 PLANNING COMMISSION RECOMMENDATION

This memo shall serve as informational to provide clarification to the Los Altos City Council on information contained within the January 10, 2023, City Council Agenda Report and attachments therein.

On January 5, 2023, the Los Altos Planning Commission considered the City's Draft 6th Cycle Housing Element (2023-2031). During the Public Hearing a presentation was given, staff responded to questions of the commission, public testimony was received, followed by discussion of the commission where staff provided additional clarification.

The Planning Commission unanimously recommended adoption of the Draft 6th Cycle Housing Element as prepared with one revision to Program 3.H. If accepted by the Los Altos City Council the recommendation of the Planning Commission would revise the Draft Housing Element as follows (Planning Commission Recommendation are notated in Red, Bold, Underlined, and strikethrough font below):

- Clarify that decisions on appeals of housing developments must be based on objective standards consistent with State law and any appeal filed with the City shall be done within ~~**10**~~ **14** calendar days post project approval; and

Conclusion

The Planning Commission Recommendation would provide 14 calendar days instead of 10 calendar days. Staff feels that this is reasonable, and still provides a level of certainty to applicants post project approval.

1 North San Antonio Road
Los Altos, California 94022-3087

M E M O R A N D U M

DATE: January 9, 2023

TO: Los Altos City Council

FROM: Nick Zornes, Development Services Director

SUBJECT: **6TH CYCLE HOUSING ELEMENT (2023-2031)**
OFFICE ADMINISTRATIVE (OA) DISTRICT SITES & PROGRAM 1.C

This memo shall serve as informational to provide clarification to the Los Altos City Council on information contained within the January 10, 2023, City Council Agenda Report and attachments therein.

On January 5, 2023, the Los Altos Planning Commission considered the City's Draft 6th Cycle Housing Element (2023-2031). During the Public Hearing a presentation was given, staff responded to questions of the commission, public testimony was received, followed by discussion of the commission where staff provided additional clarification.

Public testimony that was received commented on the Office Administrative (OA) District originally up zoning all sites within the OA District. Written public testimony received further clarified this comment stating, "The original draft of the Housing Element called for upzoning all of the OA zone", "The draft submitted to HCD changed this, so that only the parcels in the site inventory would be upzoned."

Following the January 5, 2023, Planning Commission hearing staff has reviewed and confirmed that the Site Inventory Matrix (comparison of the Public Review Draft and Current Draft) has **NO** changes to the sites list. The comparison confirms that no sites were removed, added, or modified from the inventory list for OA zoned parcels.

Program 1.C clarifications were added in August 2022 prior to submittal to HCD after the Public Review Draft comment period had closed. The following language shows the changes made only to Program 1.C:

June 2022 (Public Review Draft)

Program 1.C: Allow housing in the Office Administrative (OA) District.

The Office Administrative (OA) District, primarily located along South San Antonio Road (east of Downtown), does not currently allow residential uses. However, given the high demand for housing in Los Altos and the opportunity to provide for housing in a mixed-use environment with access to transit, the OA District will be amended to allow multi-family development. Residential uses will be allowed at a minimum density of 20 dwelling units per acre and a maximum density of 30 dwelling units per acre.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: Fourth quarter of 2025
Objective: Permit at least three (3) new housing units in the OA District during the planning period.

August 2022 (First Submittal sent to HCD)
***Revisions made to the Draft Housing Element after the 30-day Public Review Draft in June 2022 are notated in Red, Bold, and Underlined font below.**

The Office Administrative (OA) District, primarily located along South San Antonio Road (east of Downtown), does not currently allow residential uses. However, given the high demand for housing in Los Altos and the opportunity to provide for housing in a mixed-use environment with access to transit, the **sites identified in the** OA District **(Appendix B, Table B-11)** will be amended to allow multi-family development. Residential uses will be allowed at a minimum density of 20 dwelling units per acre and a maximum density of 30 dwelling units per acre.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: Fourth quarter of 2025
Objective: Permit at least three (3) new housing units in the OA District during the planning period.

December 2022 (Revisions Post 90-day HCD Review)
***Revisions made to the Draft Housing Element after the 90-day HCD First Review since November 2022 are notated in Red, Bold, Underlined, and strikethrough font below.**

Program 1.C: Allow housing in the Office Administrative (OA) District.

The Office Administrative (OA) District, primarily located along South San Antonio Road (east of Downtown), does not currently allow residential uses. However, given the high demand for housing in Los Altos and the opportunity to provide for housing in a mixed-use environment with access to transit, the sites identified in the OA District (Appendix B, Table B-11) will be

amended to allow multi-family development. Residential uses will be allowed at a minimum density of 20 dwelling units per acre and a maximum density of 30 dwelling units per acre.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: ~~**Forth quarter of 2025**~~ **December 2024**
Objective: Permit housing on at least three (3) OA District parcels during the planning period **comprising at least 30 total housing units with at least five low-income units in the highest resource areas of the city**.

Conclusion

The City did not remove any parcels from the Site Inventory, or the OA District rezone program. The City did provide clarification in Program 1.C after the 30-day Public Review Draft in August 2022 which referenced the Site Inventory only located in Appendix B. Furthermore, the City provided revisions necessary based on HCD's November 10, 2022 Findings Letter, which required the City to heighten the time frame for when Program 1.C would be completed, which has resulted with a targeted completion 1-year sooner that initially proposed. Lastly, the City provided quantified objectives for Program 1.C based on the capacity and reliance of housing production included within the housing element, the City anticipates the construction of at least 30 units within the OA District with at least 5 units for low-income households.

1 North San Antonio Road
Los Altos, California 94022-3087

M E M O R A N D U M

DATE: January 10, 2023

TO: Los Altos City Council

FROM: Nick Zornes, Development Services Director

SUBJECT: **6TH CYCLE HOUSING ELEMENT (2023-2031)**
PROGRAM 1.F REZONE VILLAGE COURT PARCEL

This memo shall serve as informational to provide clarification to the Los Altos City Council on information contained within the January 10, 2023, City Council Agenda Report and attachments therein.

On January 9, 2023, the City received written public comment regarding Program 1.F Rezone Village Court Parcel from ViNA.

On November 13, 1962, the Los Altos City Council approved 62-PUD/C-7 a request to construct and operate a planned unit development on a parcel just over 5 acres in size. As included in the original project approval the Maximum Height for 62-PUD/C-7 zoning is "2 story or 30', 1 story if within 100' of R-1".

Staff has reviewed the records provided to City late last night (January 9, 2023) that can also be found here:
https://www.losaltosca.gov/sites/default/files/fileattachments/community_development/page/39021/background_records_for_village_corner_-_el_camino_real_at_san_antonio_road.pdf

Additionally, staff has reviewed the Los Altos Municipal Code that was in effect at the original date of approval in 1962 and can confirm that the height requirements placed on 62-PUD/C-7 are standard pursuant to Sec. 10-2.1807 and have not changed since the adoption of Ordinance No. 146 titled Zoning Ordinance, effective March 6, 1958.

14.62.070 - Height of structures adjacent to single-family districts (PUD).

A. In all PUD/R, PUD/OA, and PUD/C Districts, the maximum height of commercial, professional-administrative, and multiple-family structures shall be one story or fifteen (15) feet within one hundred (100) feet of the R1-10 District.

A copy of the Los Altos Municipal Code Chapter 14.62 can be found here: https://library.municode.com/ca/los_altos/codes/code_of_ordinances?nodeId=TIT14ZO_CH14.62PUPLUNDE_14.62.070HESTADSIMIDIPU

Draft Housing Element as Proposed

Program 1.F: Rezone Village Court parcel.

To facilitate housing, the Village Court parcel at 4546 El Camino Real (APN 16712042) will be rezoned from R1-10 to Commercial Thoroughfare (CT), and modifications made to the Planned Unit Development (62-PUD/C7), as necessary for consistency with the CT District. The City will consult with adjacent property owners and interested parties throughout the Village Court rezone program.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: December 2025

Summary of Program 1.F

Program 1.F was developed in tandem with Program 1.G (Rezone housing sites from previous Housing Elements). Under AB 1397, certain rezoning requiring apply if a lower income housing site identified in the sites inventory was identified as a housing site (for any income level) in a previous housing element's site inventory. The identification of the Village Court site was previously identified in the 5th Cycle Housing Element (2015-2023) and was not successfully rezoned as previously indicated thus necessitating the inclusion of the site again in the 6th Cycle Housing Element (2023-2031). Additional requirements can be found in Program 1.G as follows:

Program 1.G: Rezone housing sites from previous Housing Elements.

Under AB 1397, certain rezoning requirements apply if a lower income housing site identified in the sites inventory (Appendix B) was identified as a housing site (for any income level) in a previous housing element's site inventory. The following vacant and nonvacant lower income sites are subject to the rezoning requirements:

- Vacant lower income sites that have been included in at least two consecutive housing element sites inventories.
- Nonvacant lower income sites that have been included in a prior housing element sites inventory.

The City will make necessary zoning amendments to allow development by right pursuant to Government Code §65583.2(i) when 20 percent or more of the units are affordable to lower income households on sites identified in Table IV-1.

Table IV-1: Previous Housing Element Cycle Sites to be Rezoned

Address	APN	Parcel Size (ac)	Zone	Lower Income Units Capacity[1]
El Camino Real	17003084	0.54	CT	22
4844 El Camino Real	17002023	0.55	CT	22
5000 El Camino Real	17004050	0.62	CT	25
4546 X El Camino Real	16712047	1.69	CT	67
4546 El Camino Real	16712042*	2.78	R1-10*	111

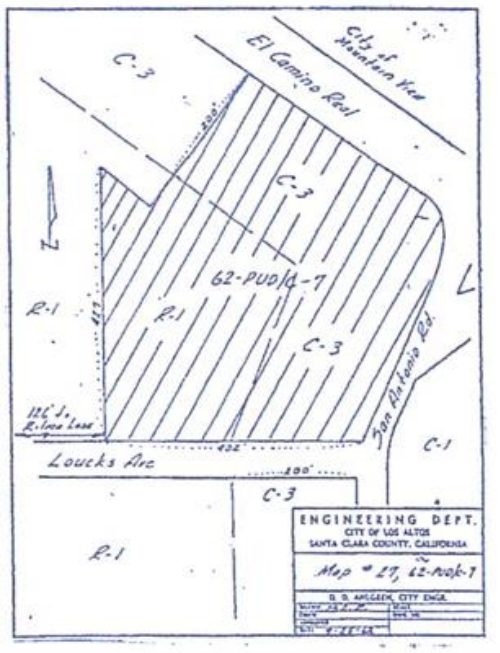
[1]These figures represent the total units accounted for after implementation of Program 1.B to increase density in the CT District (not net units arising from that Program). Currently, prior to implementation of Program 1.B, the CT District allows a density of 38 dwelling units per acre.

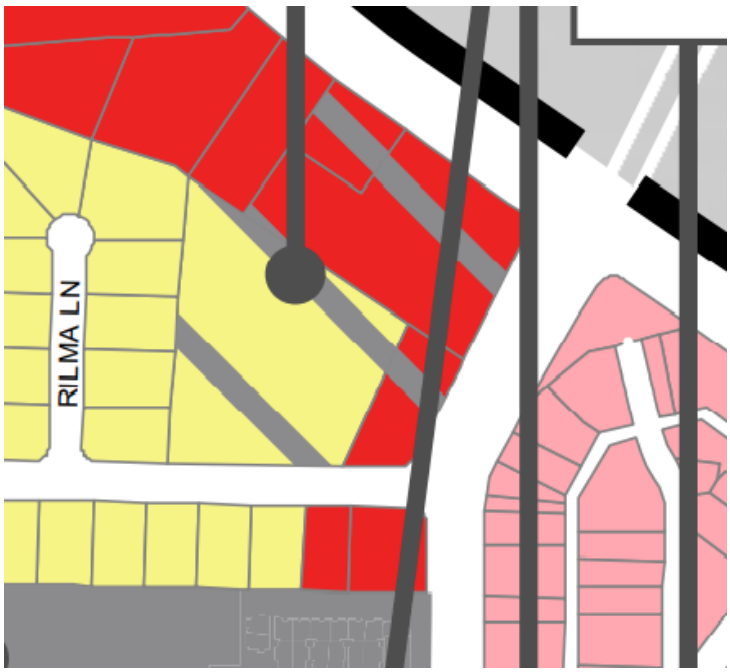
* To be rezoned CT. See Program 1.F above.

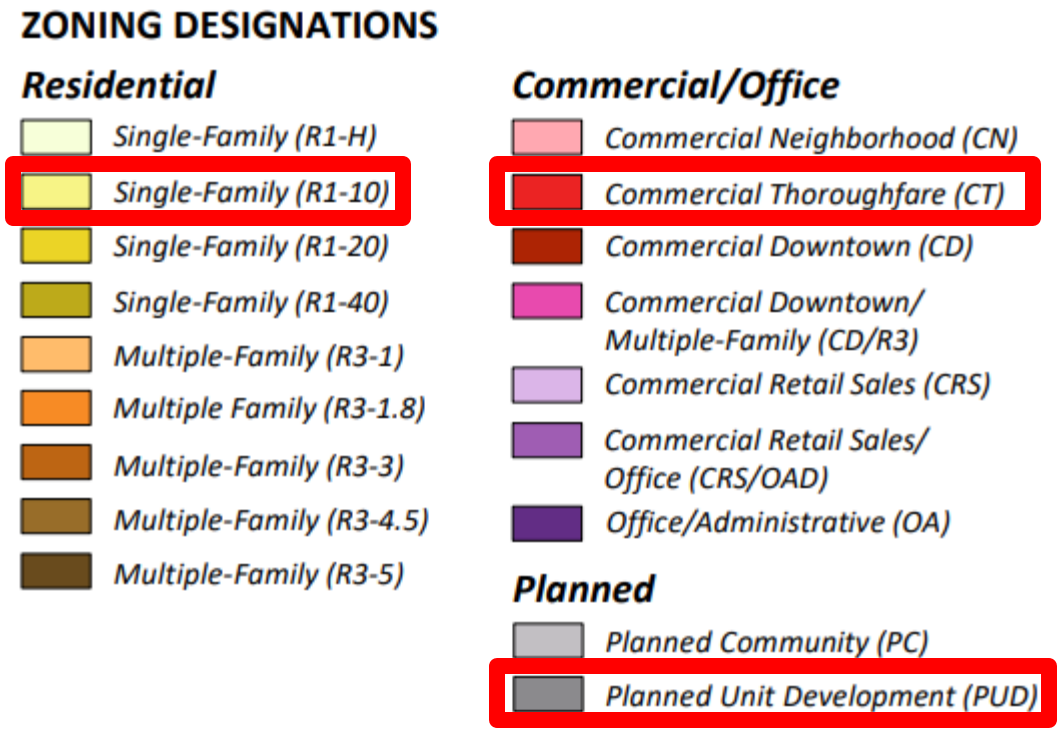
Source: City of Los Altos, Santa Clara County Assessor, LWC

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund
Time Frame: January 2024

Los Altos Zoning Map for Village Court







*The Zoning Designation Legend provided above shows the R1-10 Zoning District, CT Zoning District, and Planned Unit Development (PUD) which is graphically displayed accurately on the zoomed in sections of the Zoning Map.

Public comment regarding the City of Los Altos Zoning map for Village Court asserts that map incorrectly identifies the placement of R1 and CT Zoning at the Parcel. The City has verified and provided zoomed in sections of the City's adopted Zoning Map for reference. It is important to note that the Affidavit of Publication being reference is dated 10/4/1962, and with the vast improvements of technology the graphical depiction of the Zoning lines have been corrected over time. Additionally, the following links are provided for further transparency purposes, however the City confirms that these maps have been on the City's website for several years:

Location of Page where Maps are available:

https://www.losaltosca.gov/development-services/page/adopted-plans

City of Los Altos Zoning Map:

https://www.losaltosca.gov/sites/default/files/fileattachments/community_development/page/39021/los_altos-zoning_final_w_labels-24x36-20181026.pdf

City of Los Altos Land Use Map (General Plan Designation):

https://www.losaltosca.gov/sites/default/files/fileattachments/community_development/page/39021/los_altos-land_use_final_w_labels-24x36-20181026.pdf

Conclusion

The Village Court parcel was identified and determined to be an underutilized site in the 2015-2023 Housing Element adopted on May 26, 2015. Since the site was previously identified in a prior Housing Element the rezoning included in Program 1.F is applicable under AB 1397. The proposed Program 1.F is a Rezone of from R1-10 to Commercial Thoroughfare (CT), and any necessary modifications to 62-PUS/C7 for consistency with the CT District. Under existing zoning, and circumstances development other than what exists today onsite at Village Court would not be permitted. However, Program 1.F identifies the need to modify the existing zoning.

Lastly, as provided graphically above the City has verified the adopted Zoning Map for Village Court is accurate and reflects the zoning designations noted on the October 4, 1962 Affidavit of Publication referenced in public comment.

1 North San Antonio Road
Los Altos, California 94022-3087

M E M O R A N D U M

DATE: January 9, 2023

TO: Los Altos City Council

FROM: Nick Zornes, Development Services Director

SUBJECT: **6TH CYCLE HOUSING ELEMENT (2023-2031)**
JANUARY 5, 2023 PLANNING COMMISSION RECOMMENDATION

This memo shall serve as informational to provide clarification to the Los Altos City Council on information contained within the January 10, 2023, City Council Agenda Report and attachments therein.

On January 5, 2023, the Los Altos Planning Commission considered the City's Draft 6th Cycle Housing Element (2023-2031). During the Public Hearing a presentation was given, staff responded to questions of the commission, public testimony was received, followed by discussion of the commission where staff provided additional clarification.

During the Planning Commission Meeting Public Testimony provided comment regarding Program 1.H which commits the City of Los Altos to facilitate the development of housing on its City-owned sites, specifically Parking Plaza 7 and 8. Concern was raised by Anne Paulson of the Los Altos Affordable Housing Alliance, and Sue Russell of the League of Women Voters during oral public comments, and in writing prior to the January 5, 2023 Planning Commission Meeting.

In general, the concern raised by the two groups was regarding the number of affordable units that would be required of a Housing Developer in the future on city-owned sites. Both groups have advocated for the city-owned parking plazas to be built and used for 100% affordable projects with generous land lease terms. Furthermore, the League of Women Voters does not believe the City should be prioritizing housing for seniors, persons with disabilities and veterans without having completed a survey to determine the type of housing needed.

Draft Housing Element as Proposed

Program 1.H: Facilitate housing on City-owned sites.

The City will facilitate development of housing on City-owned sites through public-private partnerships during the planning period. City-owned Downtown Parking Plazas 7 and 8 were identified as opportunity sites that could accommodate new development, including affordable housing, in the Downtown Vision Plan. The City will offer a minimum of 20 years of a zero cost land lease to a housing development providing a minimum of 20 percent of all dwelling units to lower income households. The City will encourage the development of senior housing, housing for persons with disabilities, and veteran housing on the City-owned Parking Plazas 7 and 8. In the event the development includes market-rate housing, the City will waive all applicable permit fees. In the event the development is constructed as 100 percent affordable, the City will waive all applicable development impact fees. The City will comply with all Surplus Land Act requirements during these efforts. The City will provide a dedicated project planner to facilitate an expedited project review process.

Responsible Body: Development Services Department, Planning Commission, City Council
Funding Source: General Fund, State or federal grant funds (if available).
Time Frame: Release request for proposals by December 2023; complete entitlements within one (1) year of application if not sooner (by December 2026)
Objective: The City will enter into a public-private partnership for development of housing on at least one of the City's Downtown parking plazas.

Proposed Changes by League of Women Voters to Program 1.H

***Changes proposed by the League of Women Voters are notated in Red, Bold, Underlined, and strikethrough font below.**

The City will facilitate development of housing on City-owned sites through public-private partnerships during the planning period. City-owned Downtown Parking Plazas 7 and 8 were identified as opportunity sites that could accommodate new development, including affordable housing~~, in the Downtown Vision Plan~~. The **first RFP issued by the** City **for housing on either Parking Plaza 7 or 8** will **be** ~~**offer a minimum of 20 years of a zero cost land lease to**~~ **affordable** housing **and the City will commit to selecting the** development **proposal that maximizes public benefit** ~~**providing a minimum of 20 percent of all dwelling units to lower income households**~~**. Prior to the RFP issuance,** ~~**T**~~the City **shall hire a third-party to analyze what the minimum financially feasible affordable housing production could be, based upon a minimum of 20 years of a zero-cost land lease and a commitment to provide a minimum 55-year lease.** ~~**will encourage the development of senior housing, housing for persons with disabilities, and veteran housing on the City-owned Parking Plazas 7 and 8. In the event the development includes market-rate housing, the City will waive all applicable permit fees.**~~ In the event the development is ~~**constructed as**~~ 100**%** ~~**percent**~~ affordable, the City will waive all applicable development impact fees **per Program 2.C**. The City will comply with all Surplus

Land Act requirements ~~during these efforts~~. The City will provide a dedicated project planner to facilitate an expedited project review process.

Proposed Changes by League of Women Voters to Program 2.C

Program 2.C: Assist in securing funding for affordable housing projects.

***Changes proposed by the League of Women Voters are notated in Red, Bold, Underlined, and strikethrough font below.**

To promote the development of affordable housing projects, and when requested by the project sponsor, the City will continue to assist in securing funding for low- and moderate-income housing developments through the following actions (all of the incentives below are currently in place except for providing funding for multi-jurisdictional housing finance programs):

- Apply for State and federal funding on behalf of a nonprofit, under a specific program to construct affordable housing including persons with physical disabilities or developmental disabilities.
- Provide financial incentive ~~such as~~ waiving City fees for 100 percent affordable housing projects ~~within the City of Los Altos~~**.**
- Provide a dedicated project planner for 100 percent affordable housing projects.
- Transfer the City's annual CDBG allocation to the County for projects that serve the Los Altos community.
- Allocate a portion of CDBG funds toward affordable housing development.
- Provide funding to participate in a multi-jurisdictional housing finance program (such as a Mortgage Revenue Bond or Mortgage Credit Certification Program). The City will continue to coordinate with Santa Clara County and other agencies on multi-jurisdictional housing finance programs.

Conclusion

Staff requests formal direction from the City Council to revise Program 1.H based on the Public Testimony received.

PROGRAM	SUB PROJECT	INITIATION DATE	COMPLETION DATE	STATUS
Program 2.D: Encourage and streamline Accessory Dwelling Units (ADUs).	Budget & Hire Planning Technician		December 31, 2022	**COMPLETED**
Program 2.D: Encourage and streamline Accessory Dwelling Units (ADUs).	Amend ADU Ordinance based upon HCD's letter		6 months or less	
Program 3.H: Amend design review process and requirements.	Eliminate 3rd Party Architectural Review		February 28, 2023	
Program 3.H: Amend design review process and requirements.	Dismiss Design Review Commission		February 28, 2023	
Program 3.L: Eliminate the requirement of story poles.			March 31, 2023	
Program 2.E: Conduct annual ADU rental income surveys.	Budget & Hire Housing	March 31, 2023		
Program 4.J: Facilitate alternate modes of transportation	Adopt VMT Policy &		June 30, 2023	
Program 2.D: Encourage and streamline Accessory Dwelling Units (ADUs).	RFP-Permit Ready ADU Plans		July 31, 2023	
Program 1.H: Facilitate housing on City-owned sites.	Financial Analysis	July 1, 2023	December 31, 2023	
Program 3.D: Evaluate and adjust impact fees.		August 1, 2023	December 31, 2024	
Program 1.H: Facilitate housing on City-owned sites.	Release RFP	December 31, 2023		
Program 6.C: Target housing development in highest resource areas.	Initial Outreach		September 31, 2023	
Program 6.D: Promote Housing Choice (Section 8) rental assistance program.			September 31, 2023	
Program 2.A: Continue to implement and enhance inclusionary housing requirements.			December 31, 2023	
Program 2.B: Establish an affordable housing in-lieu fee and commercial linkage fee.	Housing in-lieu fee.		December 31, 2023	
Program 2.F: Water and Sewer Service Providers.			December 31, 2023	
Program 3.B: Modify building height in mixed-use zoning districts.	Downtown Districts		December 31, 2023	
Program 3.E: Ensure that the density bonus ordinance remains consistent with State law.			December 31, 2023	
Program 3.H: Amend design review process and requirements.	Code Amendments		December 31, 2023	

Program 3.K: Standardize multimodal transportation requirements.			December 31, 2023	
Program 4.C: Allow Low Barrier Navigation Centers consistent with AB 101.			December 31, 2023	
Program 4.D: Allow transitional and supportive housing consistent with State law.			December 31, 2023	
Program 4.E: Allow employee/farmworker housing consistent with State law.			December 31, 2023	
Program 4.F: Reasonably accommodate disabled persons' housing needs.			December 31, 2023	
Program 6.B: Maintain and expand an inventory of affordable housing funding sources.	Prepare Inventory.		December 31, 2023	
Program 6.E: Prepare and distribute anti-displacement information.			December 31, 2023	
Program 1.A: Rezone for RHNA shortfall.			January 31, 2024	
Program 1.G: Rezone housing sites from previous Housing Elements.			January 31, 2024	
Program 3.G: Amend Conditional Use Permits findings applicable to housing developments.			March 31, 2024	
Program 3.I: Allow residential care facilities consistent with State law.			March 31, 2024	
Program 3.J: Explicitly allow manufactured homes consistent with State law.			March 31, 2024	
Program 3.F: Reduce Conditional Use Permit requirement for residential mixed-use and multi-family.			September 31, 2024	
Program 1.B: Facilitate higher density housing in the Commercial Thoroughfare (CT) District.			December 31, 2024	
Program 1.C: Allow housing in the Office Administrative (OA) District.			December 31, 2024	
Program 1.E: Update the Loyola Corners Specific Plan.			December 31, 2024	
Program 2.D: Encourage and streamline Accessory Dwelling Units (ADUs).	Adopt-Permit Ready ADU Plans		December 31, 2024	

Program 3.A: Prepare a Downtown parking plan and update citywide parking requirements.			December 31, 2024	
Program 3.B: Modify building height in mixed-use zoning districts.	Neighborhood (CN) District		December 31, 2024	
Program 3.C: Remove floor-to-area ratio (FAR) restriction at Rancho Shopping Center and Woodland Plaza.			December 31, 2024	
Program 3.M: Modify parking requirements for emergency shelters consistent with State law.			December 31, 2024	
Program 2.B: Establish an affordable housing in-lieu fee and commercial linkage fee.	Commercial linkage fee.	December 31, 2025		
Program 1.D: Allow housing on certain Public and Community Facilities District sites and facilitate housing on religious institution properties.			December 31, 2025	
Program 1.F: Rezone Village Court parcel.			December 31, 2025	
Program 4.H: Provide additional density bonuses and incentives for housing that accommodates special needs groups.			December 31, 2025	
Program 4.I: Allow senior housing with extended care facilities in multi-family and mixed-use zoning districts.			December 31, 2025	
Program 1.I: Incentivize Downtown lot consolidation.			July 31, 2026	
Program 4.G: Assist seniors to maintain and rehabilitate their homes.			July 31, 2026	
Program 6.C: Target housing development in highest resource areas.	Follow-up Outreach		September 31, 2026	
Program 1.H: Facilitate housing on City-owned sites.	Entitlement Review		December 31, 2026	
Program 3.N: Modify standards in the R3 zoning districts.			December 31, 2026	

Program 4.J: Facilitate alternate modes of transportation for residents.	Capital Improvement Project for above head pedestrian crossing signals on San Antonio Road near Downtown Los		December 31, 2027	
Program 5.F: Incentivize the creation of play areas for multi-family housing projects.			December 31, 2027	
Program 1.K: Participate in regional housing needs planning efforts.			Ongoing	
Program 1.L: General Plan amendments.			Ongoing	
Program 1.M: SB 9 implementation.			Ongoing	
Program 1.N: Facilitate and monitor pipeline housing projects.			Ongoing	
Program 2.C: Assist in securing funding for affordable housing projects.			Ongoing	
Program 2.D: Encourage and streamline Accessory Dwelling Units (ADUs).			Ongoing	
Program 2.E: Conduct annual ADU rental income surveys.	Annual Survey		Annually	
Program 4.A: Support efforts to fund homeless services.			Ongoing	
Program 4.B: Continue to participate in local and regional forums for homelessness, supportive, and transitional housing.			Ongoing	
Program 5.A: Monitor condominium conversions.			Ongoing	
Program 5.B: Continue to administer the City's affordable housing programs.			Ongoing	
Program 5.C: Restrict commercial uses from displacing residential neighborhoods.			Ongoing	
Program 5.D: Implement voluntary code inspection program.			Ongoing	
Program 5.E: Help secure funding for housing rehabilitation and assistance programs.			Ongoing	

Program 6.A: Assist residents with housing discrimination and landlord-tenant complaints.			Ongoing	
Program 6.B: Maintain and expand an inventory of affordable housing funding sources.	Inform, Evaluate Apply/Submit		Ongoing	
Program 6.F: Affirmatively market physically accessible units.			Ongoing	
Program 7.A: Promote energy and water conservation and greenhouse gas reduction through education and awareness campaigns.			Ongoing	
Program 7.B: Monitor and implement thresholds and statutory requirements of climate change legislation.			Ongoing	

1 North San Antonio Road
Los Altos, California 94022-3087

M E M O R A N D U M

DATE: January 20, 2023

TO: Los Altos City Council

FROM: Nick Zornes, Development Services Director

SUBJECT: **6TH CYCLE HOUSING ELEMENT (2023-2031)**
JANUARY 10, 2023 CITY COUNCIL DIRECTION ON REVISIONS

This memo shall serve as informational to provide clarification to the Los Altos City Council on information contained within the January 24, 2023, City Council Agenda Report and attachments therein.

On January 10, 2023, the Los Altos City Council considered the City's Draft 6th Cycle Housing Element (2023-2031). During the Public Hearing a presentation was given, staff responded to questions of the City Council, public testimony was received, followed by discussion of the City Council where staff provided additional clarification.

The City Council provided direction regarding necessary revisions to the Draft 6th Cycle Housing Element to the Development Services Director, which would then return to the City Council for consideration of adoption of the document on January 24, 2023. The City Council directed revisions to five (5) areas of the housing element, and gave the Development Services Director authority to recommend the removal of one (1) site should it be appropriate. The following covers the City Council direction:

- **Program 1.B** – replace the word "targeting" with "anticipating".
  - This change is reflected in the objective section of Program 1.B.
- **Program 1.H** – revise program based upon public comment received by the League of Women Voters.
  - This change is reflected in the body and timeframe section of Program 1.H.
- **Program 2.C** – add language to Program 2.C based upon HCD's November 10, 2022, findings letter that commits the City to conducting outreach to the development community. Additionally, the City Council wanted language which supports the City to partner with nonprofit housing developers on affordable housing.
  - This change is reflected in the body and timeframe section of Program 2.C.

- **Program 3.H** – revise the program consistent with the recommendation of the Los Altos Planning Commission; providing 14 calendar days for an appeal to be filed instead of 10 calendar days.
    - This change is reflected in the body section Program 3.H.
- **Appendix C: Housing Constraints - Development Standards Analysis** – revise language on housing element pages C-13 and C-14 to clarify the correct information included in draft.
    - This change is reflected in the body of the constraints section of the housing element on pages C-13 and C-14.
- **2100 Woods Lane** – the City Council after receiving public testimony which spoke against the redevelopment of 2100 Woods Lane, provided the Development Services Director with the authority to recommend removal of the site should it be in the best interest of the City, comply with State Housing Law and appropriate consistent with the overall housing element.
    - The revised Housing Element does **not** remove 2100 Woods Lane from the site inventory.
    - It is of the professional recommendation that this site remain within the Housing Element based on multiple factors.
        - **First**, the existing Zoning designation supports the development of the site for residential units.
        - **Second**, removal of the site would result in the city only having a buffer of one (1) moderate unit only.
        - **Third**, previous and recent developer interest in developing the site with residential units.
        - **Fourth**, the conservative capacity assumption that was included in the housing element of eleven (11) units; the maximum capacity under existing zoning designation is forty (40) units. The conversative capacity assumption was utilized after analysis was conducted which evaluated the topographical, environmental and infrastructure constraints of the site that could impact the maximum unit development. The issue raised in public comment regarding the site was extensively analyzed which determined the realistic and conservative capacity of the site.
        - **Fifth**, as discussed at the City Council meeting, the inclusion of this site in the housing element does not prevent any development from occurring in the future. Additionally, it is important to note that the existing zoning designation supports the creation of housing, and with the limitations of SB-330 (The Housing Crisis Act of 2019), and Government Code Section 65863 (No Net Loss Law) the City is limited with any future changes in land use designation of the subject site.

Conclusion

Revisions to the 6th Cycle Housing Element have been made consistent with the direction provided by the City Council from the January 10, 2023 public hearing.

PROGRAM	SUB PROJECT	INITIATION DATE	COMPLETION DATE	STATUS
Program 1.A: Rezone for RHNA shortfall.			January 31, 2024	
Program 1.B: Facilitate higher density housing in the Commercial Thoroughfare (CT) District.			December 31, 2024	
Program 1.C: Allow housing in the Office Administrative (OA) District.			December 31, 2024	
Program 1.D: Allow housing on certain Public and Community Facilities District sites and facilitate housing on religious institution properties.			December 31, 2025	
Program 1.E: Update the Loyola Corners Specific Plan.			December 31, 2024	
Program 1.F: Rezone Village Court parcel.			December 31, 2025	
Program 1.G: Rezone housing sites from previous Housing Elements.			January 31, 2024	
Program 1.H: Facilitate housing on City-owned sites.	Financial Analysis	July 1, 2023	December 31, 2023	
Program 1.H: Facilitate housing on City-owned sites.	Release RFP	December 31, 2023		
Program 1.H: Facilitate housing on City-owned sites.	Entitlement Review		December 31, 2026	
Program 1.I: Incentivize Downtown lot consolidation.			July 31, 2026	
Program 1.J: Produce annual housing status reports.			April 1 (Annually)	
Program 1.K: Participate in regional housing needs planning efforts.			Ongoing	
Program 1.L: General Plan amendments.			Ongoing	
Program 1.M: SB 9 implementation.			Ongoing	
Program 1.N: Facilitate and monitor pipeline housing projects.			Ongoing	
Program 2.A: Continue to implement and enhance inclusionary housing requirements.			December 31, 2023	

Program 2.B: Establish an affordable housing in-lieu fee and commercial linkage fee.	Housing in-lieu fee.		December 31, 2023	
Program 2.B: Establish an affordable housing in-lieu fee and commercial linkage fee.	Commercial linkage fee.	December 31, 2025		
Program 2.C: Assist in securing funding for affordable housing projects.			Ongoing	
Program 2.D: Encourage and streamline Accessory Dwelling Units (ADUs).			Ongoing	
Program 2.D: Encourage and streamline Accessory Dwelling Units (ADUs).	Budget & Hire Planning Technician		December 31, 2022	**COMPLETED**
Program 2.D: Encourage and streamline Accessory Dwelling Units (ADUs).	RFP-Permit Ready ADU Plans		July 31, 2023	
Program 2.D: Encourage and streamline Accessory Dwelling Units (ADUs).	Adopt-Permit Ready ADU Plans		December 31, 2024	
Program 2.D: Encourage and streamline Accessory Dwelling Units (ADUs).	Amend ADU Ordinance based upon HCD's letter		6 months or less	
Program 2.E: Conduct annual ADU rental income surveys.	Annual Survey		Annually	
Program 2.E: Conduct annual ADU rental income surveys.	Budget & Hire Housing Manager	March 31, 2023		
Program 2.F: Water and Sewer Service Providers.			December 31, 2023	
Program 3.A: Prepare a Downtown parking plan and update citywide parking requirements.			December 31, 2024	
Program 3.B: Modify building height in mixed-use zoning districts.	Downtown Districts		December 31, 2023	
Program 3.B: Modify building height in mixed-use zoning districts.	Commercial Neighborhood (CN) District		December 31, 2024	
Program 3.C: Remove floor-to-area ratio (FAR) restriction at Rancho Shopping Center and Woodland Plaza.			December 31, 2024	
Program 3.D: Evaluate and adjust impact fees.		August 1, 2023	December 31, 2024	
Program 3.E: Ensure that the density bonus ordinance remains consistent with State law.			December 31, 2023	

Program 3.F: Reduce Conditional Use Permit requirement for residential mixed-use and multi-family.			September 31, 2024	
Program 3.G: Amend Conditional Use Permits findings applicable to housing developments.			March 31, 2024	
Program 3.H: Amend design review process and requirements.	Code Amendments		December 31, 2023	
Program 3.H: Amend design review process and requirements.	Eliminate 3rd Party Architectural Review		February 28, 2023	
Program 3.H: Amend design review process and requirements.	Dismiss Design Review Commission		February 28, 2023	
Program 3.I: Allow residential care facilities consistent with State law.			March 31, 2024	
Program 3.J: Explicitly allow manufactured homes consistent with State law.			March 31, 2024	
Program 3.K: Standardize multimodal transportation requirements.			December 31, 2023	
Program 3.L: Eliminate the requirement of story poles.			March 31, 2023	
Program 3.M: Modify parking requirements for emergency shelters consistent with State law.			December 31, 2024	
Program 3.N: Modify standards in the R3 zoning districts.			December 31, 2026	
Program 4.A: Support efforts to fund homeless services.			Ongoing	
Program 4.B: Continue to participate in local and regional forums for homelessness, supportive, and transitional housing.			Ongoing	
Program 4.C: Allow Low Barrier Navigation Centers consistent with AB 101.			December 31, 2023	
Program 4.D: Allow transitional and supportive housing consistent with State law.			December 31, 2023	

Program 4.E: Allow employee/farmworker housing consistent with State law.			December 31, 2023	
Program 4.F: Reasonably accommodate disabled persons' housing needs.			December 31, 2023	
Program 4.G: Assist seniors to maintain and rehabilitate their homes.			July 31, 2026	
Program 4.H: Provide additional density bonuses and incentives for housing that accommodates special needs groups.			December 31, 2025	
Program 4.I: Allow senior housing with extended care facilities in multi-family and mixed-use zoning districts.			December 31, 2025	
Program 4.J: Facilitate alternate modes of transportation for residents.	Transportation Demand Management Plan		June 30, 2023	
Program 4.J: Facilitate alternate modes of transportation for residents.	Capital Improvement Project for above head pedestrian crossing signals on San Antonio Road near Downtown Los Altos		December 31, 2027	
Program 5.A: Monitor condominium conversions.			Ongoing	
Program 5.B: Continue to administer the City's affordable housing programs.			Ongoing	
Program 5.C: Restrict commercial uses from displacing residential neighborhoods.			Ongoing	
Program 5.D: Implement voluntary code inspection program.			Ongoing	
Program 5.E: Help secure funding for housing rehabilitation and assistance programs.			Ongoing	
Program 5.F: Incentivize the creation of play areas for multi-family housing projects.			December 31, 2027	
Program 6.A: Assist residents with housing discrimination and landlord-tenant complaints.			Ongoing	

Program 6.B: Maintain and expand an inventory of affordable housing funding sources.	Prepare Inventory.		December 31, 2023	
Program 6.B: Maintain and expand an inventory of affordable housing funding sources.	Inform, Evaluate Apply/Submit		Ongoing	
Program 6.C: Target housing development in highest resource areas.	Initial Outreach		September 31, 2023	
Program 6.C: Target housing development in highest resource areas.	Follow-up Outreach		September 31, 2026	
Program 6.D: Promote Housing Choice (Section 8) rental assistance program.			September 31, 2023	
Program 6.E: Prepare and distribute anti-displacement information.			December 31, 2023	
Program 6.F: Affirmatively market physically accessible units.			Ongoing	
Program 7.A: Promote energy and water conservation and greenhouse gas reduction through education and awareness campaigns.			Ongoing	
Program 7.B: Monitor and implement thresholds and statutory requirements of climate change legislation.			Ongoing	

PUBLIC CORRESPONDENCE

The following is public correspondence received by the City Clerk's Office after the posting of the original agenda. Individual contact information has been redacted for privacy. This may *not* be a comprehensive collection of the public correspondence, but staff makes its best effort to include all correspondence received to date.

To send correspondence to the City Council, on matters listed on the agenda please email PublicComment@losaltosca.gov

January 17, 2023

Dear Mayor Meadows, Vice Mayor Weinberg and Members of the Los Altos City Council,

On behalf of Los Altos Community Voices (LACV), the Steering Committee wishes to express our support of the revisions to the draft Housing Element and encourages you to approve its submission to the California Department of Housing and Community Development (HCD).

We very much appreciate the hard work of Nick Zornes and his team, representatives of Lisa Wise Consulting, the Planning Commission, and each of you for the many hours of hard work you've contributed to creating a plan that not only addresses our critical need for housing, especially affordable housing, but also is sensitive to the concerns of current residents of Los Altos, and is likely to be found substantially compliant with state law by HCD.

Thank you for all you've done and will continue to do to ensure that our community does its fair share to address the housing crisis by implementing various aspects of the 6th cycle housing element in the coming years.

With gratitude and best wishes for a happy New Year,

Robin Abrams, Kim Cranston, Cathy Lazarus, Bill Sheppard, Marie Young
LACV Steering Committee

LOS ALTOS RESIDENTS

PUBLIC COMMENT ON ITEM #3 – JANUARY 24, 2023 CITY COUNCIL MEETING

January 18, 2023

Nick Zornes
Development Services Director
City of Los Altos
1 North San Antonio Road,
Los Altos, CA 94022

Re: Draft Housing Element

Dear Director Zornes:

We would like to thank you and the City Manager, Gabe Engeland, for meeting with members of Los Altos Residents (LAR) in person on December 16, 2022 to discuss the Housing Element and the HCD Review Letter comments.

The LAR team has been participated in many of the community outreach opportunities since the initiation of work on the Los Altos Housing Element. We have kept abreast of all the discussions by our City Council. We had several questions about the location of affordable housing units in the inventory site map, actual availability of some sites for residential development in the 6th cycle, the parking plazas downtown and the plan for replacement parking, the city's ability to comply with certain aspects of the Affirmatively Furthering Fair Housing Act (AFFH) and other matters. We forwarded our questions to you a week in advance to allow for a thorough discussion at our meeting.

We came away from our meeting with you and City Manager Engeland confident that the city has fulfilled its obligation to find suitable sites that could be developed to meet our RHNA requirements. We are also confident that the city will fulfill its obligations pursuant to AFFH in part by hiring a Housing Manager and by way of the Programs included in the Revised Housing Element which we understand will be evolving as the city collects data.

Members of the LAR team were also able to attend the Los Altos Community Coalition Zoom meeting that you conducted Director Zornes. This meeting was also informative and gave all the attendees an opportunity to ask questions.

As a member of the League of Women Voters' Housing Committee of the Los Altos/Mountain View Area chapter, I was able to meet with you together with other LWV members who are residents of Los Altos. We provided you with questions in advance for this meeting and, like the meeting with LAR members, you answered our questions and provided a good deal of additional information which we found very useful.

We are very pleased with the number of community outreach meetings you have attended to educate the community and, most importantly, receive our input regarding the Housing Element. Thank you for all your hard work for the City of Los Altos.

Best regards,

Freddie Wheeler
Co-founder, Steering Committee member
www.LosAltosResidents.org

PUBLIC CORRESPONDENCE

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LEAGUE OF WOMEN VOTERS®
OF LOS ALTOS-MOUNTAIN VIEW AREA

January 22, 2023

Re: Agenda Item # 3 – Sixth Cycle Housing Element 2023-2031

Dear Mayor Meadows and Members of the Los Altos City Council:

The LWV was pleased to see that at its January 10th meeting the Council was supportive of the language we suggested for Program 1.H: Facilitate housing on City-owned sites and Program 2.C Assist in securing funding for affordable housing projects by waiving City fees. We urge the Council to formally adopt the Housing Element presented by Staff. We are optimistic that the Revised 6th Cycle Housing Element will be substantially compliant with State law and will provide a roadmap for production of much-needed housing in Los Altos.

(Please send any questions about this email to Sue Russell at [redacted]

Karin Bricker, President LWV of Los Altos/Mountain View Area

Cc: Gabe Engeland Nick Zornes Angel Rodriguez [redacted]
housingelements@hcd.ca.gov

Los Altos Affordable Housing Alliance

January 22, 2023

Dear Mayor Meadows and Councilmembers,

Thank you for your hard work as well as that of the Staff to ensure that our Housing Element fulfills the requirements from the State and creates a plan for our city for development. We urge you to adopt the update to the Housing Element, which will allow submission to HCD before the deadline of January 31st.

The process to update the Housing Element, which of course started more than a year ago with a different Council and many different staff members, has been thorough. We have observed the coordination, collaboration, and much detail-oriented work to create the current document. At LAAHA we are excited about the document that has been created. It lays out a plan for the future of development in our city that will allow more housing, particularly more housing of various types and various costs.

There is still much work ahead and an ambitious timeline to complete it, but we look forward to developments in the next 8 years that lead to continued vibrancy in Los Altos. Please adopt the Housing Element and let's get on with the work.

Respectfully,
LAAHA Steering Committee

PUBLIC CORRESPONDENCE

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To send correspondence to the City Council, on matters listed on the agenda please email PublicComment@losaltosca.gov

From: Janet Hurt
To: Public Comment
Subject: PUBLIC COMMENT AGENDA ITEM 3-1/24
Date: Monday, January 23, 2023 8:07:46 PM

I want to provide comment regarding the medical offices along Altos Oaks and my understanding that they will be converted to multi-family residence. I am very concerned about this transition. We moved to Golden Way so our son can attend Loyola Grammar school and take part in building relationships with the Pediatric Dentistry and Orthodontics, PT Works for physical therapy, and Altos Eye Physicians community. My understanding is these doctor offices will be converted to multi-family residence that will include up to 100 living units. Why would the city close these multi-institutional medical offices and replace them with residential homes? These practices have been around for many decades and serve so many families who depend on these local offices. Where will local residence go once these offices are closed, I would guess that some of the doctor offices will close for good leaving many residences without care as many new doctor offices in Los Altos are not accepting new patients. One of the many reasons we chose to move to Los Altos (Golden Way) was the charm and location of Loyola and a variety of local doctor offices and specialties. This will significantly impact our health care and our reason for living where we do.

The other major concern is the impact to traffic with adding up to 100 living spaces in such a small street – I understand these dwellings can be up to 3 stories which will significantly impact (negatively) living and traveling in and around this area (we live on Golden Way) which will impact parking in and round our house. Given the traffic for Loyola and the local doctor offices, the traffic is manageable as well as parking, I see that significantly changing with the addition of the 100 housing units. This will be a nightmare for all of us living on Golden Way and Altos Oaks – I believe these roads will be a nightmare for all local residents.

I urge you to reconsider and allow the Altos Oaks doctor offices/dentists/specialists to remain on Alto Oaks and that you find a new place to build these housing units. The damage that will be done to this area, the loss of these beloved medical practices, the traffic, noise, and charm will be lost forever. I urge you to stop this plan of closing the beloved medical offices on Altos Oaks and move the 100-unit residential plan to another location in Los Altos.

Kind Regards,
Janet Hurt
Golden Way
Los Altos

Confidentiality Notice. This email (including all attachments) is for the sole use of the intended recipient(s) and may include information that is confidential, privileged and/or attorney work product. Any review, disclosure, distribution or reliance upon this email by others is strictly prohibited. If you are not an intended recipient, please contact the sender and delete all copies including any attachments.

From: Payal B
To: Public Comment
Subject: PUBLIC COMMENT AGENDA ITEM 3 - 1/24/23
Date: Tuesday, January 24, 2023 11:30:03 AM

The OA district on Altos Oaks Dr should not be rezoned to allow multifamily residential for reasons stated below:

-It will be unsafe for children to access Mckenzie park as the road will be a lot busier.
-Each office is proposed to be zoned for 6-7 units, which would mean it could be a multistory. This is a privacy concern for nearby residences.
-The OA district on Altos Oaks Dr doesn't have the infrastructure in terms of roads that lead to it to support the high traffic density that the multifamily residential will cause.

-Payal

From: Anirban Ray
To: Public Comment
Subject: PUBLIC COMMENT AGENDA ITEM 3 - 1/24/23
Date: Tuesday, January 24, 2023 11:35:06 AM

Hello,

Requesting the City Council to reconsider rezoning of the medical practices along Altos Oaks Dr as part of the Housing Element update. This rezoning not only is a privacy concern for abutting houses but also is a safety issue for children in our neighborhood walking to access Mckenzie park and Loyola Elementary school due to the increased traffic. The traffic currently at Altos Oaks Dr medical offices is just about at a level that is not disruptive to nearby residential areas. Zoning this for multifamily residential or mixed use of offices along with residential will cause huge traffic disruptions. It will make the traffic unmanageable on Altos Oaks Dr and the service road on the other side.

While I truly support affordable housing, urging the City Council to carefully consider the implications of this rezoning and do what is best for the safety of our community. Higher density construction in the downtown areas will allow us to meet the numbers required by the state without causing disruptions
to residential neighborhoods.

-Anirban

From: Shani Kleinhaus
To: City Council; Public Comment
Cc: Planning Services; Nick Zornes
Subject: PUBLIC COMMENT AGENDA ITEM 3 - January 24, 2023
Date: Tuesday, January 24, 2023 12:13:41 PM
Attachments: Los Altos Housing element 1-24-23 (2).pdf
RB2 Comments_PreliminaryProjectReview_2100WoodsLane_PPR21-0007withAttachment (4) (1).pdf

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Dear Mayor Meadows and Los Altos City Council,

The Santa Clara Valley Audubon Society promotes the enjoyment, understanding, and protection of birds and other wildlife by engaging people of all ages in birding, education, and conservation. We work in open space and urban landscape to protect species and their habitats. Because of the great importance of waterways and wetlands to our species, these natural resources are of great importance to our members. As we have previously highlighted, the 2100 Woods Lane property is an important natural feature in Los Altos. It is a place where special status species can be found and is therefore treasured by the community.

We respectfully asks that the City of Los Altos:
Identify in the Mitigated Negative Declaration all waters of the United States, as delineated by the Army Corps of Engineers in the attached letter from Mr. Brian Wines, Water Board Water Resource Control Engineer, Watershed Division, to the City of Los Altos Planning Department.
That Mr. Brian Wines' letter and additional information from the Army Corps of Engineers and California Department of Fish and Wildlife for the creek, wetlands and riparian watershed located on APN 34204089 & 34204078 be included in the City Planning file and shared with people who inquire with City Planning about the 2100 Woods Lane property.

In addition, we ask to be notified of any project applications or CEQA documents that pertain to the 2100 Woods Lane property, at address below.

Thank you,

Shani Kleinhaus, Ph.D.
Environmental Advocate
Santa Clara Valley Audubon Society
22221 McClellan Rd.
Cupertino, CA 95014
[redacted]g

SCVAS
Santa Clara Valley Audubon Society

To: Mayor Meadows and Los Altos City Council

January 24, 2023

Re: Item 3 on tonight's Agenda: Sixth Cycle Housing Element 2023-2031

Dear Mayor Meadow and Council members,

The Santa Clara Valley Audubon Society promotes the enjoyment, understanding, and protection of birds and other wildlife by engaging people of all ages in birding, education, and conservation. We work in open space and urban landscape to protect species and their habitats. Because of the great importance of waterways and wetlands to our species, these natural resources are of great importance to our members. As we have previously highlighted, the 2100 Woods Lane property is an important natural feature in Los Altos. It is a place where special status species can be found and is therefore treasured by the community.

We respectfully asks that the City of Los Altos:

1) Identify in the Mitigated Negative Declaration all waters of the United States, as delineated by the Army Corps of Engineers in the attached letter from Mr. Brian Wines, Water Board Water Resource Control Engineer, Watershed Division, to the City of Los Altos Planning Department.
2) That Mr. Brian Wines' letter and additional information from the Army Corps of Engineers and California Department of Fish and Wildlife for the creek, wetlands and riparian watershed located on APN 34204089 & 34204078 be included in the City Planning file and shared with people who inquire with City Planning about the 2100 Woods Lane property.

In addition, we ask to be notified of any project applications or CEQA documents that pertain to the 2100 Woods Lane property, at address below.

Thank you,

Shani Kleinhaus, Ph.D.
Environmental Advocate
Santa Clara Valley Audubon Society
22221 McClellan Rd.
Cupertino, CA 95014
[redacted]

CALIFORNIA Water Boards

GAVIN NEWSOM GOVERNOR

JARED BLUMENFELD SECRETARY FOR ENVIRONMENTAL PROTECTION

San Francisco Bay Regional Water Quality Control Board

March 2, 2022

City of Los Altos
Planning Department
Attn: Sean Gallegos, Senior Planner (sgallegos@losaltosca.gov)

Subject: Comments on the Preliminary Project Review, 2100 Woods Lane, Application No. PPR21-0007

Dear Mr. Gallegos,

San Francisco Bay Regional Water Quality Control Board (Water Board) staff appreciate the opportunity to provide comments on the preliminary project review for a three story, 177-unit, Residential Care Facility for the Elderly that is proposed for construction at 2100 Woods Lane in the City of Los Altos. We are concerned that the plans for the proposed project that are posted on the City of Los Altos Planning Department website do not acknowledge the presence of a creek channel and freshwater wetlands on the Project site. On April 9, 2019, the U.S. Army Corps of Engineers provided a delineation of waters of the U.S. at the property at 2100 Woods Lane in the City of Los Altos (See Attachment). This delineation identified more than 300 linear feet of a creek channel on the project site and 0.17 acres of associated freshwater wetlands. Please note that, while federal jurisdiction extends to the ordinary high water mark, Water Board jurisdiction extends to the top of bank and California Department of Fish and Wildlife (CDFW) jurisdiction extends to the outer dripline of riparian vegetation at the top of bank.

The Water Board has regulatory authority over wetlands and stream channels under both the federal Clean Water Act (CWA) and the State of California's Porter-Cologne Water Quality Control Act (California Water Code, Division 7). Under the CWA, the Water Board has regulatory authority over actions in waters of the United States, through the issuance of water quality certifications (Certifications) under Section 401 of the CWA, which are issued in conjunction with permits issued by the Corps, under Section 404 of the CWA. When the Water Board issues Section 401 Certifications, it simultaneously issues general Waste Discharge Requirements (WDRs) for the project, under the Porter-Cologne Water Quality Control Act. Activities in areas that are outside of the jurisdiction of the Corps (e.g., isolated wetlands, vernal pools, seasonal streams, intermittent streams, channels that lack a nexus to navigable waters, or stream banks above the ordinary high water mark) are regulated by the Water Board, under the authority of the Porter-Cologne Water Quality Control Act. Activities that lie outside of Corps jurisdiction may require the issuance of either individual or general WDRs.

Under the authority of the Porter-Cologne Water Quality Act, the Water Board has developed, and implements, the *San Francisco Bay Basin Water Quality Control Plan*

(Basin Plan), which defines the Beneficial Uses of waters of the State within the San Francisco Bay Region. Any permit action taken by the Water Board must be consistent with maintaining Beneficial Uses of waters of the State.

The project proponent should not assume that the Water Board will issue permits for the culverting of several hundred linear feet of a creek channel at the project site. When the Water Board receives an application for Certification and/or WDRs, staff reviews the project to verify that the project proponent has taken all feasible measures to avoid impacts to waters of the State (these impacts usually consist of the placement of fill in waters of the State). Where impacts to waters of the State cannot be avoided, projects are required to minimize impacts to waters of the State to the maximum extent practicable (i.e., the footprint of the project in waters of the State is to be reduced as much as possible). Compensatory mitigation is then required for those impacts to waters of the State that cannot be avoided or minimized. Avoidance and minimization of impacts is a prerequisite to developing an acceptable project and identifying appropriate compensatory mitigation for an approved project's impacts. Avoidance and minimization cannot be used as compensatory mitigation. After avoidance and minimization of direct impacts to waters of the State have been maximized for the proposed project, the necessary type and quantity of compensatory mitigation for the remaining impacts to waters of the State are assessed on a case-by-case basis.

Under both the Clean Water Act and the *San Francisco Bay Basin Water Quality Control Plan* (Basin Plan), projects are required to demonstrate avoidance of impacts to waters of the U.S. and waters of the State, in conformance with U.S. Environmental Protection Agency's CWA 404(b)(1) Guidelines (Guidelines). The Guidelines provide guidance in evaluating the circumstances under which the filling of wetlands or other waters may be permitted. Projects must first exhaust all opportunities, to the maximum extent practicable, to avoid, and then to minimize impacts to jurisdictional waters. For non-water dependent projects, the Guidelines presume that alternatives that do not impact wetlands or other jurisdictional waters are available. Only after all options for avoidance and minimization of impacts have been exhausted, including implementing the project at an alternative location, is it appropriate to develop mitigation for adverse impacts to waters of the U.S. and waters of the State. The project proposes to fill more than 300 linear feet of a creek channel and associated freshwater wetlands for a non-water dependent project (senior housing). Review consistent with the Guidelines is not likely to support the issuance Certification and/or WDRs for the proposed fill of all jurisdictional waters at the project site.

Even if the Corps, CDFW, and the Water Board were to issue permits for the proposed culverting of the creek and fill of wetlands at the project site, it will be difficult for the project to provide mitigation for the amount of proposed fill of waters of the State. Mitigation for impacts to waters of the State should be "in-kind" mitigation. In other words, fill of creek channels should be mitigated by the creation or restoration of a creek channel. In-kind mitigation for the loss of the creek channel at the project site requires the creation of a minimum of more than 300 linear feet of new creek channel. However, due to the significant uncertainties associated with the creation of a new creek channel,

the actual required amount of linear feet of restored creek channel are likely to be significantly greater than 300 linear feet.

The project will not be able to purchase mitigation credits from a mitigation bank or an in-lieu-fee program. There are currently no mitigation banks with available riparian credits or freshwater wetland mitigation credits that have service areas that include Los Altos. Therefore, permittee-responsible mitigation will be required for fill of waters of the State at the project site.

Acceptable mitigation for fill of waters of the State at the Project site will probably be expensive, including the purchase of a mitigation site with the appropriate size and hydrology to support the creation of a mitigation creek channel. The resource agencies will require that a conservation easement, deed restriction, or other form of restrictive covenant be placed over the property on which the mitigation channel is created.

The design of a geomorphically stable mitigation creek channel is a complex process. Designs acceptable to the resource agencies should be based on the collection of site-specific data, including, but not limited to: sediment load; bankfull flow elevations and channel cross-section dimensions; and thalweg stability. Such data will be essential to developing a design that could be submitted to the resource agencies for review and approval. Any channel creation would also require significant post-creation maintenance and monitoring. Ten to twenty years of post-construction monitoring may be necessary to properly evaluate the post-creation stability of a 300-foot long, or longer, mitigation creek channel. In addition, contingency measures must be developed so that corrective measures can be rapidly implemented in the event that the created channel proves to be unstable. The project would also need to ensure that adequate funding for contingency measures was available. Any permits issued for the proposed channel fill would probably require that the project proponents provide the resource agencies with a bond containing sufficient funding for the implementation and long-term monitoring and maintenance of contingency measures. And the project proponent would remain financially liable for the mitigation project until the mitigation feature had achieved all of its success criteria. In the event that the mitigation site proves to be unable to meet its success criteria, then the project proponent would be financially responsible for designing, implementing, maintaining, and monitoring an alternate mitigation site.

Please contact me at [redacted] if you have any questions.

Sincerely,

Brian K. Wines

Brian Wines
Water Resource Control Engineer
Watershed Division

Attachment: April 9, 2019 Corps Delineation

cc:
Los Altos Planning Department (planning@losaltosca.gov)
SRM Development, LLC, James Rivard [redacted]
Vijay Israni [redacted]
Huffman-Broadway Group, Terry Huffman ([redacted]
Corps, Katerina Galacatos [redacted]
CDFW, Kristin Garrison ([redacted]
Santa Clara Valley Audubon Society, Shani Kleinhaus [redacted]
Richard Probst [redacted]
Agnes Derbin Caulfield [redacted]

DEPARTMENT OF THE ARMY
SAN FRANCISCO DISTRICT, U.S. ARMY CORPS OF ENGINEERS
450 GOLDEN GATE AVENUE
SAN FRANCISCO, CALIFORNIA 94102

April 9, 2019

Regulatory Division

Subject: File No. 2015-00285S

Mr. Terry Huffman
Huffman-Broadway Group, Inc.
828 Mission Avenue
San Rafael, California, 94538

Dear Mr. Huffman:

This correspondence is in reference to your submittal of 10-18-2018, on behalf of Blue Creek Capital LLC, requesting a preliminary jurisdictional determination of the extent of navigable waters of the United States and waters of the United States occurring on an approximately 9 acre site located along the end of Woods lane, in the City of Los Altos, Santa Clara County, California, at center latitude 37.201399°N and longitude -122.043990°W.

All proposed discharges of dredged or fill material occurring below the plane of ordinary high water in non-tidal waters of the United States; or below the high tide line in tidal waters of the United States; and within the lateral extent of wetlands adjacent to these waters, typically require Department of the Army authorization and the issuance of a permit under Section 404 of the Clean Water Act of 1972, as amended, 33 U.S.C. § 1344 *et seq.*

The enclosed delineation map titled "Preliminary Jurisdictional Determination, # 2015-00285S, 2100 Woods Lane," in one sheet and date certified 4-2-2019, depicts the extent and location of wetlands and other waters of the United States, within the boundary area of the site that **may be** subject to U.S. Army Corps of Engineers' regulatory authority under Section 404 of the Clean Water Act. This preliminary jurisdictional determination is based on the current conditions of the site, as verified during a field investigation of 10-18-2018, a review of available digital photographic imagery, and a review of other data included in your submittal. While this preliminary jurisdictional determination was conducted pursuant to Regulatory Guidance Letter No. 16-01, *Jurisdictional Determinations*, it may be subject to future revision if new information or a change in field conditions becomes subsequently apparent. The basis for this preliminary jurisdictional determination is fully explained in the enclosed *Preliminary Jurisdictional Determination Form*. You are requested to sign and date this form and return it to this office within two weeks of receipt.

You are advised that the preliminary jurisdictional determination may **not** be appealed through the U.S. Army Corps of Engineers' *Administrative Appeal Process*, as described in 33 C.F.R. pt. 331 (65 Fed. Reg. 16,486; Mar. 28, 2000). Under the provisions of 33 C.F.R Section 331.5(b)(9), non-appealable actions include preliminary jurisdictional determinations since they

are considered to be only advisory in nature and make no definitive conclusions on the jurisdictional status of the water bodies in question. However, you may request this office to provide an approved jurisdictional determination that precisely identifies the scope of jurisdictional waters on the site; an approved jurisdictional determination may be appealed through the *Administrative Appeal Process*. If you anticipate requesting an approved jurisdictional determination at some future date, you are advised not to engage in any on-site grading or other construction activity in the interim to avoid potential violations and penalties under Section 404 of the Clean Water Act. Finally, you may provide this office new information for further consideration and request a reevaluation of this preliminary jurisdictional determination.

You may refer any questions on this matter to Keith Hess of my Regulatory staff by telephone at (707) 443-0855 or by e-mail at keith.d.hess@usace.army.mil. All correspondence should be addressed to the Regulatory Division, North Branch, referencing the file number at the head of this letter.

The San Francisco District is committed to improving service to our customers. My Regulatory staff seeks to achieve the goals of the Regulatory Program in an efficient and cooperative manner while preserving and protecting our nation's aquatic resources. If you would like to provide comments on our Regulatory Program, please complete the Customer Service Survey Form available on our website: http://www.spn.usace.army.mil/Missions/Regulatory.aspx.

Sincerely,

Keith Hess for

Katerina Galacatos
Acting Chief, Regulatory Division

Enclosures

Copy Furnished (w/ encl):
Attn; Mr. Nitesh Singh
Blue Creek Capital LLC
4160 Technology Dr.
Fremont, California 94538

Appendix 2 - PRELIMINARY JURISDICTIONAL DETERMINATION (PJD) FORM

BACKGROUND INFORMATION

A. REPORT COMPLETION DATE FOR PJD: April 2, 2019

B. NAME AND ADDRESS OF PERSON REQUESTING PJD: Terry Huffman, Huffman-Broadway Group, 828 Mission Avenue, San Rafael, California, 94901

C. DISTRICT OFFICE, FILE NAME, AND NUMBER:

San Francisco District, 2100 Woods Lane, Los Altos, 2015-00285S

D. PROJECT LOCATION(S) AND BACKGROUND INFORMATION:
(USE THE TABLE BELOW TO DOCUMENT MULTIPLE AQUATIC RESOURCES AND/OR AQUATIC RESOURCES AT DIFFERENT SITES)

State: California County/parish/borough: City: Los Altos

Center coordinates of site (lat/long in degree decimal format):
Lat: 37.20139 N ° Long: -122.043990 °
Universal Transverse Mercator:

Name of nearest waterbody: Stevens Creek and Permanente Creek

C. REVIEW PERFORMED FOR SITE EVALUATION (CHECK ALL THAT APPLY):

☐ Office (Desk) Determination. Date:

☒ Field Determination. Date(s): 10-18-2018

TABLE OF AQUATIC RESOURCES IN REVIEW AREA WHICH "MAY BE" SUBJECT TO REGULATORY JURISDICTION.

Site number	Latitude (decimal degrees)	Longitude (decimal degrees)	Estimated amount of aquatic resource in review area (acreage and linear feet, if applicable)	Type of aquatic resource (i.e. wetland vs. non-wetland waters)	Geographic authority to which the aquatic resource "may be" subject (i.e. Section 404 or Section 10/404)
SW 1	37.20'17.71"	-122.04'39.33"	0.027	Seasonal wetland	Section 404
SW2	37.20'12.62"	-122.04'40.09	0.147	Seasonal wetland	Section 404
IS	37.20'07.08	-122.04'40.36"	314 lineal Feet	Natural & Culverted Stream Channel	Section 404

1) The Corps of Engineers believes that there may be jurisdictional aquatic resources in the review area, and the requestor of this PJD is hereby advised of his or her option to request and obtain an approved JD (AJD) for that review area based on an informed decision after having discussed the various types of JDs and their characteristics and circumstances when they may be appropriate.
2) In any circumstance where a permit applicant obtains an individual permit, or a Nationwide General Permit (NWP) or other general permit verification requiring "pre-construction notification" (PCN), or requests verification for a non-reporting NWP or other general permit, and the permit applicant has not requested an AJD for the activity, the permit applicant is hereby made aware that: (1) the permit applicant has elected to seek a permit authorization based on a PJD, which does not make an official determination of jurisdictional aquatic resources; (2) the applicant has the option to request an AJD before accepting the terms and conditions of the permit authorization, and that basing a permit authorization on an AJD could possibly result in less compensatory mitigation being required or different special conditions; (3) the applicant has the right to request an individual permit rather than accepting the terms and conditions of the NWP or other general permit authorization; (4) the applicant can accept a permit authorization and thereby agree to comply with all the terms and conditions of that permit, including whatever mitigation requirements the Corps has determined to be necessary; (5) undertaking any activity in reliance upon the subject permit authorization without requesting an AJD constitutes the applicant's acceptance of the use of the PJD; (6) accepting a permit authorization (e.g., signing a proffered individual permit) or undertaking any activity in reliance on any form of Corps permit authorization based on a PJD constitutes agreement that all aquatic resources in the review area affected in any way by that activity will be treated as jurisdictional, and waives any challenge to such jurisdiction in any administrative or judicial compliance or enforcement action, or in any administrative appeal or in any Federal court; and (7) whether the applicant elects to use either an AJD or a PJD, the JD will be processed as soon as practicable. Further, an AJD, a proffered individual permit (and all terms and conditions contained therein), or individual permit denial can be administratively appealed pursuant to 33 C.F.R. Part 331. If, during an administrative appeal, it becomes appropriate to make an official determination whether geographic jurisdiction exists over aquatic resources in the review area, or to provide an official delineation of jurisdictional aquatic resources in the review area, the Corps will provide an AJD to accomplish that result, as soon as is practicable. This PJD finds that there *"may be"* waters of the U.S. and/or that there *"may be"* navigable waters of the U.S. on the subject review area, and identifies all aquatic features in the review area that could be affected by the proposed activity, based on the following information:

SUPPORTING DATA. Data reviewed for PJD (check all that apply)

Checked items should be included in subject file. Appropriately reference sources below where indicated for all checked items:

☒ Maps, plans, plots or plat submitted by or on behalf of the PJD requestor:

Map:

☒ Data sheets prepared/submitted by or on behalf of the PJD requestor.

☒ Office concurs with data sheets/delineation report.

☐ Office does not concur with data sheets/delineation report. Rationale:____

☐ Data sheets prepared by the Corps:_____

☐ Corps navigable waters' study:_____

☐ U.S. Geological Survey Hydrologic Atlas:

☐ USGS NHD data.

☐ USGS 8 and 12 digit HUC maps.

☐ U.S. Geological Survey map(s). Cite scale & quad name:_____

☐ Natural Resources Conservation Service Soil Survey. Citation:_____

☐ National wetlands inventory map(s). Cite name:

☐ State/local wetland inventory map(s):_____

☐ FEMNFIRM maps:_____

☐ 100-year Floodplain Elevation is:_____. (National Geodetic Vertical Datum of 1929)

☐ Photographs: ☒ Aerial (Name & Date): Google

or ☐ Other (Name & Date):___

☐ Previous determination(s). File no. and date of response letter:_____

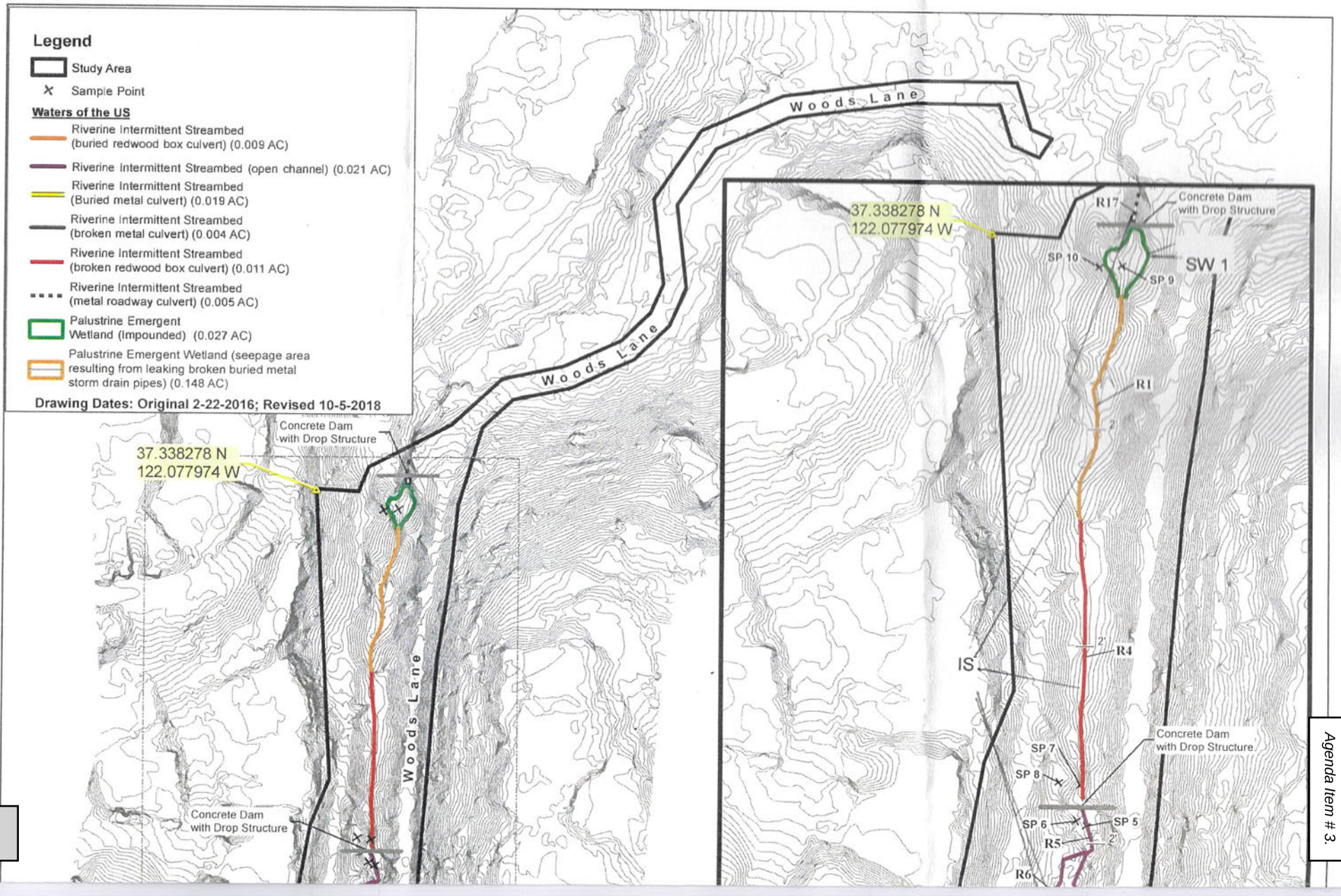
☐ Other information (please specify):_____

IMPORTANT NOTE: The information recorded on this form has not necessarily been verified by the Corps and should not be relied upon for later jurisdictional determinations.

Signature and date of
Regulatory staff member
completing PJD

Signature and date of
person requesting PJD
(REQUIRED, unless obtaining
the signature is impracticable)[1]

[1] Districts may establish timeframes for requester to return signed PJD forms. If the requester does not respond within the established time frame, the district may presume concurrence and no additional follow up is necessary prior to finalizing an action.


Legend
Study Area
Sample Point
Waters of the US
Riverine Intermittent Streambed (buried redwood box culvert) (0.009 AC)
Riverine Intermittent Streambed (open channel) (0.021 AC)
Riverine Intermittent Streambed (Buried metal culvert) (0.019 AC)
Riverine Intermittent Streambed (broken metal culvert) (0.004 AC)
Riverine Intermittent Streambed (broken redwood box culvert) (0.011 AC)
Riverine Intermittent Streambed (metal roadway culvert) (0.005 AC)
Palustrine Emergent Wetland (Impounded) (0.027 AC)
Palustrine Emergent Wetland (seepage area resulting from leaking broken buried metal storm drain pipes) (0.148 AC)
Drawing Dates: Original 2-22-2016; Revised 10-5-2018
Woods Lane
Woods Lane
Woods Lane
37.338278 N
122.077974 W
Concrete Dam with Drop Structure
Concrete Dam with Drop Structure
Concrete Dam with Drop Structure
37.338278 N
122.077974 W
R17
SP 10
SP 9
SW 1
R1
2'
R4
IS
SP 7
SP 8
SP 6
SP 5
R5
2'
R6

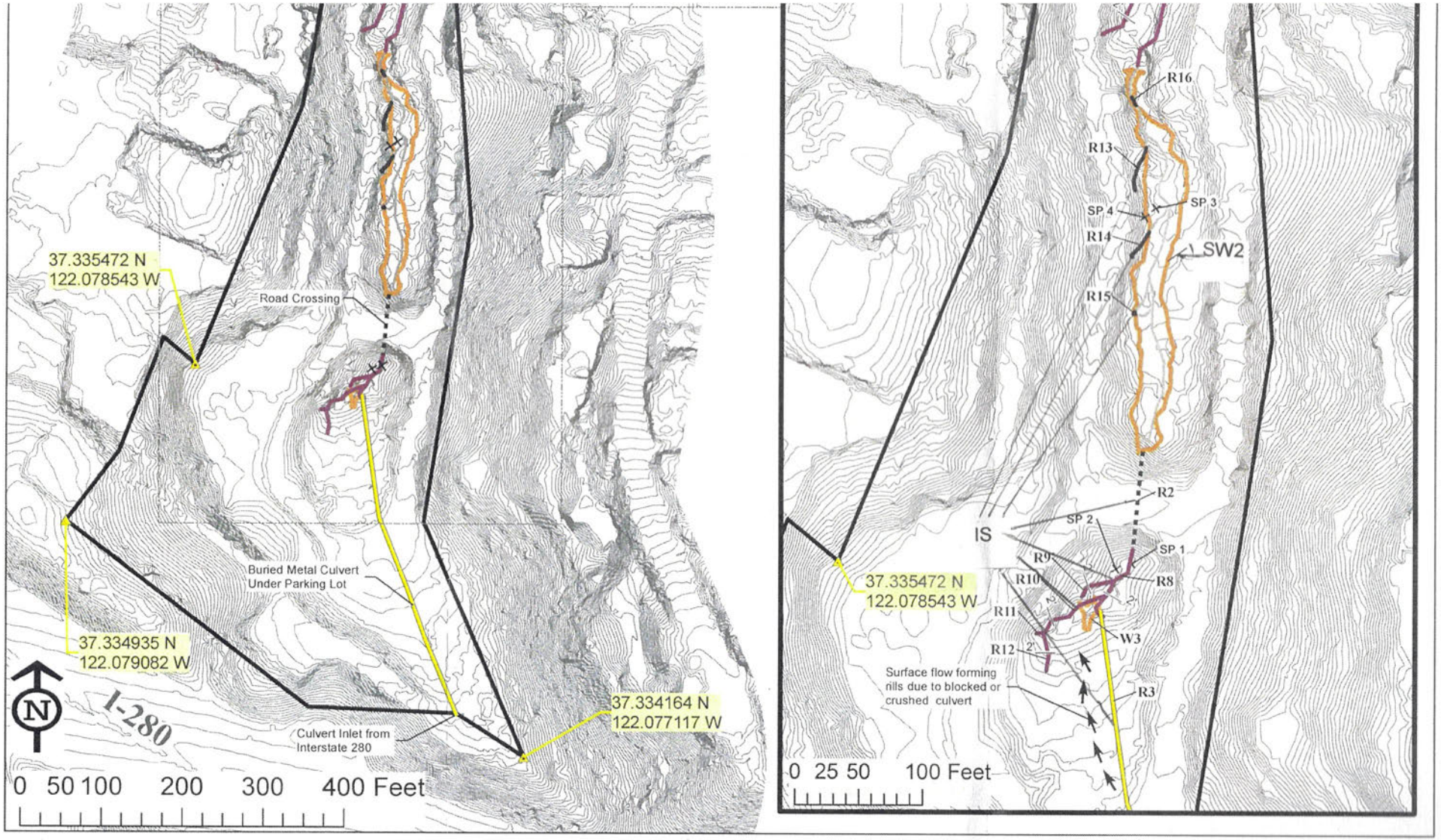


Figure 8. Areas Subject to Corps and US EPA Section 404 Clean Water Act Jurisdiction
2100 Woods Lane, Santa Clara County, California

U.S. Army Corps of Engineers
San Francisco District
Regulatory Division

Preliminary Jurisdictional Determination,
Pursuant to Section 404 Clean Water Act

2100 Woods Lane
Los Altos, Santa Clara County, California

Study Area Boundary

See legend for potentially jurisdictional aquatic resources

File ID. **2015-00285S** Date: **April 4, 2019** Sheet 1 o

AGENDA REPORT SUMMARY

Meeting Date: January 24, 2023

Subject Affirm 2023 Council Commission and Committee Assignments: Pursuant to City Council Norms and Procedures, Affirm Mayor appointment to the Santa Clara County Library District JPA

Prepared by: Angel Rodriguez, Interim City Clerk
Reviewed by: Jon Maginot, Assistant City Manger
Approved by: Gabriel Engeland, City Manager

Attachment(s):
1. 2023 Council Assignments
2. Councilmembers Assignment Preferences
3. City Council Norms and Procedures

Initiated by:
City Council

Previous Council Consideration:
None

Fiscal Impact:
None

Environmental Review:
Not applicable

Policy Question(s) for Council Consideration:
- Does the Council wish to affirm the Mayor's appointments to the Santa Clara County Library District JPA?

Summary:
- The Mayor annually appoints Councilmembers to serve on local, regional boards and Council committees and commissions for 2023
- The Mayor's appointments were affirmed at the January 10, 2023 Regular Council meeting with the exception of the Santa Clara County Library District JPA

Reviewed By:

City Manager	City Attorney	Finance Director
GE	JH	JF

Subject: Affirm 2023 Council Commission and Committee Assignments: Pursuant to City Council Norms and Procedures, Affirm Mayor appointment to the Santa Clara County Library District JPA

Staff Recommendation:
Pursuant to City Council Norms and Procedures, affirm the Mayor's appointment to the Santa Clara County Library District JPA.

Purpose
Affirm the Mayor's appointments to the Santa Clara County Library District JPA.

Background
Per the City's Council Norms and Procedures, the Mayor appoints Councilmembers to serve on various local, regional Council Committees and regional boards. These appointments are done at the beginning of each year with the exception of certain, multi-year appointments. The appointments are subject to affirmation by the full Council. The Mayor's appointments were affirmed at the January 10, 2023 Regular Council meeting with the exception of the Santa Clara County Library District JPA.

Discussion/Analysis
For calendar year 2023, Mayor Meadows assignments can be referenced in Attachment 1.

Recommendation
Pursuant to City Council Norms and Procedures, affirm the Mayor's appointments to the Santa Clara County Library District JPA

2023 City Council Assignments

Confirmed at the January 10, 2023 Regular Council meeting

Council Standing Committees

Council Legislative Subcommittee**	*see footnote*
City/LASD Schools Issues	Lee Eng, Dailey
City/MVLA High School Issues	Meadows, Weinberg
City/CUSD/FUSD Schools Issues	Lee Eng, Fligor
Open Government	Meadows, Weinberg
Youth Commission Interview	Weinberg, Fligor

Community Organizations

CHAC	Meadows
Los Altos/Los Altos Hills Joint Community Volunteer Awards Committee	Fligor

County and Regional Organizations

	Primary	**Alternate (if any)**
*Association of Bay Area Governments	Fligor	Weinberg
Santa Clara County Cities Association – Board	Meadows	Weinberg
Santa Clara County Cities Association – Legislative Action Committee	Fligor	Meadows
Santa Clara County Cities Association – Selection Committee	Meadows	Weinberg
*Santa Clara County Library District JPA	*No Appointment made on 1/10/23 – Lee Eng to Continue until appointment is made*	
*North County Library Authority (2 year term)	Meadows, Dailey	
Valley Transportation Authority - Policy Advisory Committee	Weinberg	Fligor
Valley Transportation Authority - State Route 85 Corridor Policy Advisory Board	Fligor	Weinberg
*Santa Clara Valley Water Commission (2-year term)	Fligor	Dailey
County Housing & Community Development Advisory Committee (HCDAC)	Dailey	0
Silicon Valley Regional Interoperability Authority (SVRIA) (3-year term)	Weinberg	Dailey
Grand Boulevard Initiative Task Force	Dailey	Meadows
Silicon Valley Clean Energy Authority Board	Meadows	Dailey
Santa Clara County Expressway Policy Advisory Board	Fligor	0

Commissions

Complete Streets	Fligor
Design Review	Meadows
Environmental	Dailey
Financial	Weinberg
Historical	Meadows
Library	Meadows
Parks and Recreation	Fligor
Planning	Weinberg
Public Arts	Dailey
Senior	Lee Eng
Youth	Lee Eng

***Designated Filer for Form 700**
****Will be discussed as future City Council agenda item**
*****No Councilmember interest**

January 2023

2023 City Council Assignments Preferences

Preferences Identified by each Councilmember: **H**igh, **M**edium, **L**ow

	Primary	Alternate	Dailey	Fligor	Lee Eng	Meadows	Weinberg
Council Standing Committees							
Council Legislative Subcommittee	2	0		M	M		M
City/LASD Schools Issues	2	0	H	L	M		L
City/MVLA High School Issues	2	0	H	L	M		M
City/CUSD/FUSD Schools Issues	2	0	L	H	H		M
Open Government	2	0	L	H	M		M
Youth Commission Interview	2	0	L	H	H		H
Community Organizations							
CHAC	1	0	H	L	L		L
Los Altos/Los Altos Hills Joint Community Volunteer Awards Committee	1	0	M	M	L		L
County and Regional Organizations							
*Association of Bay Area Governments	1	1	H	H	M		H
Santa Clara County Cities Association – Board (Mayor is primary)	1	1	H	L	L		H
Santa Clara County Cities Association – Legislative Action Committee	1	1	L	L	L		M
Santa Clara County Cities Association – Selection Committee	1	1	H	L	M		L
*Santa Clara County Library District JPA	1	1	L	H	H		L
*North County Library Authority (2 year term)	2	0	M	L	L		
Valley Transportation Authority - Policy Advisory Committee	1	1	L	H	H		H
Valley Transportation Authority - State Route 85 Corridor Policy Advisory Board	1	1	L	H	L		M
*Santa Clara Valley Water Commission (2-year term)	1	1	H	H	H		M
County Housing & Community Development Advisory Committee (HCDAC)	1	0	H	M	M		L
Silicon Valley Regional Interoperability Authority (SVRIA) (3-year term)	0	1	M	L	L		X (Appointed 2021, term ends 12/ 2023)
Grand Boulevard Initiative Task Force	1	1	M	L	L		L
Silicon Valley Clean Energy Authority Board	1	1	H	L	L		L
Santa Clara County Expressway Policy Advisory Board	1	0	M	H	L		M

	Primary	Alternate	Dailey	Fligor	Lee Eng	Meadows	Weinberg
Commissions							
Complete Streets	1	0	M	H	M		H
Design Review	1	0	M	H	L		L
Environmental	1	0	H	M	L		L
Financial	1	0	H	M	H		H
Historical	1	0	H	L	M		L
Library	1	0	M	M	M		L
Parks and Recreation	1	0	M	M	L		M
Planning	1	0	M	L	M		H
Public Arts	1	0	M	L	M		L
Senior	1	0	L	H	H		L
Youth	1	0	L	L	H		M

***Designated Filer for Form 700**

☒ currently assigned to committee

CITY COUNCIL
NORMS AND PROCEDURES

COUNCILMEMBERS
Anita Enander
Neysa Fligor
Lynette Lee Eng
Sally Meadows
Jonathan Weinberg

COUNCIL NORMS AND PROCEDURES
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CITY OF LOS ALTOS
CITY COUNCIL NORMS AND PROCEDURES

SECTION 1. GENERAL

1.1 Purpose. The purpose of these Norms and Procedures is to promote communication, understanding, fairness, and trust among the members of the City Council, staff, and members of the public concerning their roles, responsibilities, and expectations for management of the business of the City of Los Altos. The Norms also inform the public about what to expect from their elected representatives while performing their duties.

1.2 Values. Councilmembers shall represent the best interests of the City and community at large. Councilmembers shall treat fellow Councilmembers, members of the public, Commission and Committee members, and staff and consultants with respect, civility, and courtesy. All Councilmembers shall respect each other's individual points of view and right to disagree. When addressing the public in any way, all Councilmembers shall make certain their opinions are expressed solely as their own, and do not necessarily reflect the opinions of any other Councilmember. Councilmembers shall respect and abide by the decisions of the majority of the Council at all times.

1.3 Review. The City Council shall conduct a review of this document biennially, or whenever a new Councilmember has been seated or Council deems necessary, to assist Councilmembers in being more productive in management of the business of the City. A new Council will consider the document within three months of its first regular meeting.

1.4 Compliance with Applicable Laws. All conduct of the City Council, Commissions, Committees and Subcommittees shall be in full compliance with all applicable laws, including but not limited to State laws such as the Ralph M. Brown Act, the California Public Records Act, and the Political Reform Act, as amended. If there is a conflict between the Norms and Procedures and an applicable law, the applicable law shall govern.

SECTION 2. MAYOR AND VICE MAYOR SELECTION PROCESS

2.1 Reorganization. The reorganization of the Council and the seating of new Councilmembers shall occur at a special meeting held on the earliest available Tuesday following the certification of election results, which is typically on the first Tuesday of December. If the certification is delayed because of a recount or other reason, the Council will wait until the certification is final before holding its reorganization special meeting.

Seating preferences on the dais shall be made by the Mayor, Vice Mayor and then by seniority of the rest of the members, in that order. If two members have equal seniority based on year elected, then the member with the higher vote count in their most recent election is considered to have higher seniority.

A community reception honoring the incoming and outgoing Mayor and Councilmembers will be held immediately following the reorganization meeting.

2.2 Election of Mayor. Only Councilmembers elected by the voters or appointed to the City Council due to the cancelation of an election may serve as Mayor.

The term of office shall be one year. The Councilmember must have served at least 23 months to be eligible for Mayor. A majority vote of the Council is necessary to designate the Mayor. If there is at least one elected Councilmember with a minimum of 23 months of service who has not served as Mayor, he or she shall be designated Mayor before those who have already served as Mayor.

If there are two or more such members who have served more than 23 months and have never served as Mayor, the one having served the longest time on the Council shall be designated as Mayor.

In the event there are two or more members who have never served as Mayor and have served the same length of time, the one who received the greatest number of votes at his/her/their election or re-election to the Council shall become Mayor.

In the event there are two or more members who have served as Mayor, who have served the same continuous length of time, and who have been re-elected to the Council, the one who received the greatest number of votes at his/her/their re-election to the Council shall become Mayor.

In the event three new members are elected to the Council, then an exception to Sections 2.2 and 2.3 will apply, allowing the immediate appointment of a Vice Mayor without the normal 11 months of prior service, and the following year such person may be appointed as the Mayor without the normal 23 months of prior service. Any member re-elected to the Council after a break in service will be treated in the normal sequence for appointment as Vice Mayor and Mayor, without regard to such person's service prior to the break in service.

The Mayor may be removed from office, for cause, by a 4/5ths affirmative vote of the members. The person is to be advised of the proposed cause for removal at least 72 hours before the action is taken. Requests for an agenda item to consider removal of the Mayor should be made to the City Manager.

2.3 Election of Vice Mayor. Only Councilmembers elected by the voters or appointed to the City Council due to the cancelation of an election may serve as Vice Mayor.

The selection process for determining who shall serve as Vice Mayor will follow that of Mayor, except the Councilmember must have served at least 11 months to be eligible to serve as Vice Mayor.

The Vice Mayor may be removed from office, for cause, by a 4/5ths affirmative vote of the members. The person is to be advised of the proposed cause for removal at least 72 hours before the action is taken. Requests for an agenda item to consider removal of the Vice Mayor should be made to the City Manager.

2.4 Councilmembers Serving After a Break in Service. The time of continuous service for any elected member of the Council who previously served on the Council prior to a break in service shall be considered to have started at his/her/their election after their break in service.

2.5 Appointment of Vacancy. In the event of a vacancy of office by the death or resignation of any Councilmember, the Council shall appoint a new Councilmember within sixty (60) days

after a vacancy becomes effective in compliance with the California Elections Code, unless the Council, by resolution, decides to instead call a special election. In the event of appointment, the Council shall determine the process for appointment prior to the application process and in accordance with State law.

SECTION 3. COUNCIL SUBCOMMITTEES

3.1 Responsibility. The Mayor shall appoint Councilmembers to standing and ad hoc subcommittees as required to accomplish the work of the Council, subject to affirmation by the Council at its next regular meeting. It will be the responsibility of these subcommittees to inform and make recommendations to the Council and submit them to the Council for a vote. Staff shall work with, and support, Council subcommittees as required.

3.2 Instructions and Expectations. The Council shall make certain that all Council subcommittees are properly instructed in their assigned scope of work and responsibilities. The expected outcome of the committee's efforts shall be defined in writing and approved by a majority of the City Council.

3.3 Reporting. Council subcommittee members are to keep the Council informed of the work and progress of their subcommittee. These reports or minutes shall be made in writing whenever a recommendation is made to the Council.

3.4 Standing Subcommittees. From time to time, the City Council may vote to establish standing subcommittees. These include: the Council Youth Commission Interview Committee, the Open Government Committee, and joint committees with the different school districts that serve Los Altos residents.

The Council Youth Commission Interview Committee consists of two members of the City Council and is responsible for conducting interviews of applicants for the Youth Commission and making recommendations to the City Council regarding the appointments. The Committee meets as needed.

The City/ School District Committees consist of two members of the City Council and two members of the Board of Trustees of the applicable School District. The purpose of the subcommittee is to facilitate communication between the two bodies on issues of mutual concern by both legislative bodies, as directed by the City Council and/or School Board. Meetings are open to the public and are generally held at least bi-annually.

The Open Government Committee consists of two members of the City Council and advises the City Council and provides information to the City Manager on potential ways to implement the Open Government Policy. The Committee develops appropriate goals to ensure practical and timely implementation of the Open Government Policy and proposes any amendments to the Policy.

SECTION 4. COMMISSIONS AND COMMITTEES

4.1 Responsibility. The Council may appoint residents of the community to the City's non-Council standing commissions and committees. Commission and committee members shall represent the interests of the community at-large when serving on these bodies. These commissions and committees will respect the public and staff and shall take seriously their responsibility for reporting to the Council. Each commission is to keep a rotation schedule

for representation at City Council meetings by one of its members. Attendance is required when a commission has an item of interest on the Council agenda, so as to be available to answer Council questions.

4.2 Governing. The City's Commissions and Committees are governed by the Commission Handbook as adopted and amended by the City Council. If there is a conflict between the Commission Handbook and the Norms and Procedures, the Commission Handbook shall control as to the Commissions and Committees.

4.3 Commission Liaisons. To facilitate the exchange of information between the Council and its Commissions, the Mayor will at least annually make liaison appointments to the Commissions. These appointments shall be ratified by the Council. Councilmembers shall respect the separation between policy making and advisory Commissions by: A) not attempting to lobby or influence Commissions on any item under their consideration; B) attending meetings of assigned Commissions, but not taking a position on an item before the Commission; C) not voting at the Commission's meeting on any item; and D) assisting the Commission in scheduling recommendations to be heard by the Council.

If an issue arises regarding a member of any Commission, staff may work with the assigned Council Liaison to resolve the issue.

4.4 Attendance Requirement for Commissioners. Commissioners are expected to attend meetings in accordance with the Commissioner Handbook. If a Commissioner is not meeting the attendance requirement, the Commission Chair will first address the issue by talking with the Commissioner and will give the Commissioner an opportunity to meet the requirements. If the Commissioner continues to not meet the attendance requirement, the Chair can give the Commissioner an opportunity to resign from the Commission. If the Commissioner does not want to resign and continues to not meet the attendance requirement, the Chair should discuss with the staff liaison and Council liaison the appropriate action to address it.

4.5 Discipline or Removal of a Commissioner. Commissioners serve at the pleasure of the City Council. The City Council may discipline or remove a Commissioner at any time solely at the discretion of the Council. Any proposed removal can be with or without cause. A Councilmember who wishes to discipline or remove a Commissioner shall indicate their desire to place the discipline or removal on a future agenda at the end of a regular Council meeting. If three or more Councilmembers wish to agendize the discipline or removal of a certain Commissioner, the item will be placed on a Council agenda.

SECTION 5. AD HOC COMMITTEES AND TASK FORCES

5.1 Instructions and Expectations. The Council shall make certain that all Council-appointed Ad Hoc Committees and Task Forces are properly instructed in their assigned scope of work and responsibilities. The expected outcome of the Committee's or Task Force's efforts shall be defined in writing and formally approved by a majority of the City Council.

5.2 Reports. Ad Hoc Committees and Task Forces are responsible for keeping the Council informed about issues being considered, and their progress. This is to be accomplished by meeting minutes distributed in the Council meeting packets or through oral reports to Council. Ad Hoc Committees and Task Forces are responsible for advising the Council of any need for information or more specific instructions.

5.3 Redirection. Ad Hoc Committees and Task Forces shall obtain Council concurrence before they proceed in any direction different from the original instructions of the Council.

5.4 Noticing. Per Resolution No. 2015-09, Ad Hoc Committees and Task Forces that are created by the City Council and are composed of less than a quorum of the Council and have members of City Commissions and/or members of the public on the committee are subject to the provisions of the Ralph M. Brown Act.

SECTION 6. ADMINISTRATIVE MATTERS

6.1 Attendance. City Councilmembers acknowledge that attendance at lawful meetings of the City Council is part of their official duty. Councilmembers shall make a good faith effort to attend all such meetings unless unable. Councilmembers will notify the Mayor or the City Clerk if they will be absent from a meeting.

6.2 Correspondence. With some exceptions, proposed correspondence (including electronic) from individual Councilmembers/Mayor on City stationery shall be reviewed by the Council in draft form prior to release. On occasion, there are urgent requests for correspondence concerning legislation directly affecting municipalities. The Mayor may send a letter without first obtaining Council review if the content of the letter aligns with the Council's position on the subject issue. A copy of the letter should be sent to all Councilmembers.

City letterhead will be made available for routine, discretionary correspondence (i.e., thank you notes, etc.), or such correspondence will be prepared by staff for signature, without prior consent of the Council. E-mails from Councilmembers should be respectful, professional, and consistent with the City's Electronic Use Policy.

6.3 Regional Boards. The Mayor shall appoint Councilmembers to Regional Committees/Commissions/Boards as required by the governing bodies. These appointments are subject to affirmation by the Council. The role of the Council on regional boards will vary depending on the nature of the appointment. Representing the interests of Los Altos is appropriate on some boards; this is generally the case when other local governments have their own representation.

The positions taken by the appointed representatives are to be in alignment with the positions that the Council has taken on issues that directly impact the City of Los Altos. If an issue should arise that is specific to Los Altos, and the Council has not taken a position, the issue should be discussed by the Council prior to taking a formal position at a regional board meeting, to assure that it is in alignment with the Council's position.

Council representatives to such boards shall keep the Council informed of ongoing business through brief oral or written reports to the Council.

Councilmembers shall make a good faith effort to attend all regional meetings that require a quorum of the appointed members to convene a meeting. If a Councilmember is unable to attend, he/she should notify his/her/their alternate as far in advance of the meeting as possible so as to allow the alternate to attend.

Appointments to regional boards shall terminate upon the expiration of Councilmember's term unless: 1) the Councilmember is reelected and can serve the full term on the regional board; or 2) action is taken by the Council to reappoint the individual to the regional board, and such appointment is consistent with the regional board's policies.

6.4 Response to Public. It will be the responsibility of the City Manager to ensure a response is provided to all public correspondence for informational requests addressed to the Council. Staff shall respond to all requests for services and provide a copy of such correspondence to the City Council, as appropriate.

6.5 Proclamations. Proclamations are discretionary public announcements directing attention to a local resident, organization, or event. The Mayor, without formal action of the Council, may issue proclamations. Requests for proclamations should be submitted at least one week in advance. This allows the Mayor to decide if a proclamation should be issued. Alternatively, the Mayor, at his/her/their discretion, may refer a request to Council.

6.6 Reimbursement. City Councilmembers may be reimbursed for personal expenses for travel to and lodging at conferences or meetings related to their role as a Councilmember. Reimbursements shall be subject to the City's Travel and Expense Policy.

Brief reports must be given on any outside meeting attended at the expense of the City at the next regular Council meeting. Reimbursement is conditioned on the submission of this report to the City Council.

6.7 Training.

Ethics: Members of the City Council and commissions shall receive at least two hours of ethics training in general ethics principles and ethics laws relevant to his/her/their public service every two years. New members must receive this training within their first year of service. Members shall attend training sessions that are offered locally in the immediate vicinity of Santa Clara County or by completing online a state-approved public service ethics education program.

An individual who serves on multiple legislative bodies need only receive two hours of ethics training every two years to satisfy this requirement for all applicable public service positions.

Sexual Harassment: In addition, Councilmembers shall receive two hours of sexual harassment prevention training every two years, per State law. New members must receive this training within their first six months of service.

Brown Act: Members of the City Council and those individuals appointed by the City Council to serve on a commission or advisory committee will receive training on the requirements of the Brown Act at the time they begin their service and again when there is a scheduled Commission training.

Anti-Bias: At least every 2 years, Councilmembers and Commissioners will receive anti-bias training organized by the City.

Other Training. From time to time, the City Council may direct that Members of the City Council and Commissions receive training on different topics.

The City Clerk is required to keep training records for five years to document and prove that these continuing education requirements have been satisfied. These documents are public records subject to disclosure under the California Public Records Act.

6.8 Use of Electronic Devices during Council Meetings. The City Council permits and promotes the utilization of technology to ensure efficient and effective conduct of the people's business, in accordance with applicable open meetings and records laws, due process rights of interested parties, and other applicable law and city policies.

i. Councilmembers' use of electronic communications and data devices (including – but not limited to – laptop computers, cell phones, tablet computers, pagers, wearable technology, and similar devices), at a meeting during which the Councilmember is subject to the provisions of the Brown Act shall be limited to personal use (note taking, etc.) and to access documents only available to the member (e.g., personal files stored on the cloud) or documents available to the public (e.g. documents on the City's website, websites available to the public, etc.).

ii. At a meeting during which a Councilmember is subject to the provisions of the Brown Act, the Councilmember may not use electronic devices to read electronic communications from, or send electronic communications to, members of the public, other Councilmembers, and parties to city proceedings. If a Councilmember receives an electronic communication which the member believes to be a family emergency, the Councilmember should ask the Mayor to take a break so the Councilmember may address the issue. The Councilmember should not read the electronic communication during the meeting.

6.9 City Mission and City Seal. The Mission of the City of Los Altos is a statement that reflects the values of our residents. The City Seal is an important symbol of the City of Los Altos. No change to the City Mission and/or City Seal shall be made without Council approval. Use of the City Seal shall be by permission of the City Clerk.

6.10 Use of email. City Councilmembers shall strive to use only their City email account for City business.

SECTION 7. COUNCIL RELATIONSHIP WITH STAFF

7.1 City Manager. City Councilmembers are always free to go to the City Manager to discuss any subject. Issues concerning the performance of a Department, or any employee must be directed to the City Manager. City Councilmembers shall not meet with groups of management employees for the purpose of discussing terms of employment or establishing employee policy. Direction to City employees, other than the City Manager or City Attorney, is the prerogative of the City Manager. In passing along critical information, the City Manager will be responsible for contacting all Councilmembers. The City Manager may delegate this responsibility to Department Heads.

7.2 Agenda Item Questions. The Council shall not abuse, embarrass, or harass staff. If a Councilmember has a question on a subject, the Councilmember should contact the City

Manager prior to any meeting at which the subject may be discussed. This does not restrict Councilmembers from asking questions during a Council meeting.

7.3 Complaints. Councilmembers shall encourage people to file all complaints related to work or services provided by City staff directly with the City Manager and the appropriate staff member. The City manager and staff shall ensure that all people receive a response. If a Councilmember receives a complaint directly, the Councilmember should forward the complaint to the City Manager. If all Councilmembers are copied on the same complaint and the City Manager is not copied, the Mayor is responsible for forwarding the complaint to the City Manager.

7.4 Staff. Councilmembers may ask Department Heads for information. This informal system of direct communication is not to be abused.

SECTION 8. MEETINGS

8.1 Open to Public. All meetings of the City Council, except for closed sessions as authorized by law, shall be open to the public. All meetings shall be noticed as required to allow action to be taken by the Council.

8.2 Broadcasting of City Council Meetings. All regular Council meetings and study sessions shall be scheduled in the Community Meeting Chambers to allow for web streaming and simulcast on the City's Government Access Channel, unless the number of participants exceeds room capacity. The final decision shall be the responsibility of the Mayor. All regular City Council meetings and study sessions shall be video-recorded, unless the City is unable to do so due to unforeseen circumstances or circumstances beyond the City's control in which case the meeting shall be audio-recorded.

8.3 Regular Meetings. The City Council shall conduct its regular meetings at the time and place established by ordinance. At the first regular meeting in December, the City Council will approve the schedule of meetings for the next calendar year, which shall be the Council's adopted regular meeting schedule. This practice does not, however, preclude the Mayor or a majority of the members of the City Council from calling additional meetings pursuant to Section 8.5, if necessary. If the Council schedules a meeting that is not part of the adopted regular meeting schedule, that meeting shall be a special meeting or a study session.

It will be the custom to have a recess at approximately 9:00 p.m. Prior to the recess, the Mayor shall announce whether any items will be carried over to the next meeting. The established hour after which no new items will be started is 11:00 p.m. Remaining items, however, may be considered by consensus of the Council.

8.4 Cancelling Meetings. Any meeting of the City Council may be cancelled in advance by majority vote of the Council. The Mayor may cancel a meeting in the case of an emergency or when a majority of members have confirmed in writing to the City Manager their unavailability to attend a meeting or agreement to cancel a meeting.

8.5 Special Meetings. A special meeting may be called at any time by the Mayor or by a majority of the City Council in accordance with the Brown Act. Written notice of any such meeting must specify the purpose of the meeting and the identities of members making the call. Notice of the meeting must be given in accordance with law. Public comments at special meetings shall be limited to only those items described on the special meeting notice/agenda.

The City Council may hold study sessions or joint meetings with other boards, commissions, committees, or agencies as deemed necessary to attend to City business. These meetings will be coordinated by the City Clerk. Study sessions are scheduled to provide Councilmembers the opportunity to better understand a particular item. While Council may legally take action at any noticed meeting, generally no formal action is taken at study sessions. If action is to be taken at a study session, then the agenda will state that action may be taken.

8.6 Virtual Meetings. If, pursuant to applicable laws or orders, the City Council holds a virtual special or regular meeting, the requirements set forth in the Norms and Procedures shall still apply, to the extent these requirements are feasible. Any feature on the platform hosting the virtual meeting that allows members of the public and/or Councilmembers to communicate outside of the approved methods of communication for the meeting, for example a "chat" feature, shall be disabled during the meeting.

8.7 Closed Sessions. The City Council may hold closed sessions at any time authorized by law (and in consultation with the City Attorney), to consider or hear any matter, which is authorized by law. The Mayor or a majority of the City Council may call closed session meetings at any time. Requests for a closed session should be made to the City Manager.

8.8 Annual Retreat. The City Council shall hold an annual retreat following the reorganization of the Council (typically in December or January). The primary purpose of the retreat shall be to review accomplishments for the past calendar year and to discuss and set priorities for the City Council for the following calendar year. The Mayor may also work with the City Manager to organize other activities for the annual retreat such as team building exercises and having guest speaker(s). The retreat may be held over multiple days.

8.9 Quorum. Three (3) members of the City Council shall constitute a quorum and shall be sufficient to transact business. If less than three Councilmembers appear at a regular meeting, the Mayor, Vice Mayor in the absence of the Mayor, any Councilmember in the absence of the Mayor and Vice Mayor, or in the absence of all Councilmembers, the City Clerk or Deputy City Clerk, shall adjourn the meeting to a stated day and hour.

Business of the City Council may be conducted with a minimum of three members being present; however, pursuant to the California Government Code, matters requiring the expenditure of City funds and all resolutions and non-urgency ordinances must receive three affirmative votes for approval.

8.10 Minutes. Staff shall prepare minutes of all public meetings of the City Council. Copies shall be distributed to each Councilmember. Closed session minutes, if any, shall be approved by all Councilmembers and kept in strict confidence.

8.11 Adjourned Meetings. The City Council may adjourn any regular, adjourned regular, special, or closed session meeting to a time and place specified in the order of adjournment and permitted by law. Similar to all sections in the Norms and Procedures, this section is subject to section 14 of the Norms and Procedures.

SECTION 9. POSTING NOTICE AND AGENDA

9.1 Posting of Notice and Agenda. For every regular, special, or study session meeting, the City Clerk or other authorized person shall post a notice of the meeting, specifying the time and

place at which the meeting will be held, and an agenda containing a brief description of all items of business to be discussed at the meeting. This notice and agenda may be combined in a single document. Posting is to be according to the City's Open Government Policy and State law.

9.2 Location of Posting. The notice and agenda shall be posted at City Hall and at the meeting location, if located away from City Hall, in a place to which the public has unrestricted access and where the notice and agenda are not likely to be removed or obscured by other posted material, and to the City website. Similar to all sections in the Norms and Procedures, this section is subject to Section 14 of the Norms and Procedures.

SECTION 10. AGENDA CONTENTS

10.1 Setting the Agenda. The Mayor, in consultation with the City Manager or his/her/their designee, and the City Clerk shall organize the agenda.

10.2 Description of Matters. All items of business to be discussed at a meeting of the City Council shall be briefly described on the agenda. The description should set forth the proposed action to be considered so that members of the public will know the nature of the action under review and consideration.

10.3 Availability to the Public. The agenda for any regular, special, or study session meeting, shall be made available to the general public as required by law.

10.4 Limitation to Act Only on Items on the Agenda. No action shall be taken by the City Council on any item not on the posted agenda, subject only to the exceptions listed below:

A. Upon a majority determination that an "emergency exception" (as defined by State Law) exists; or
B. Upon determination by a 4/5 vote of the full City Council, or a unanimous vote if less than a full Council, that an "urgency exception" (as defined by State Law) exists and the Council needs to take immediate action and that the need to take the action came to the attention of the City Council subsequent to posting of the agenda.
C. Two Councilmembers are required to request an item be placed on the agenda for the full Council to determine if the item meets the urgency or emergency exception. This determination is done in accordance with Section 10.4A or 10.4B above and occurs soon after the Council meeting begins. If the Council votes to hear the emergency or urgency item, the item would then be placed as a discussion item on that Council meeting's agenda.

10.5 Order of Agenda. The prescribed order of the agenda for Regular Meetings of the Council will be as follows: Establish Quorum, Pledge of Allegiance, Closed Session Announcement (if needed), Changes to the Order of the Agenda, Special Items, Public Comments on Items not on the Agenda, Consent Calendar, Public Hearings, Discussion Items, Informational Items, City Council Reports, Future Agenda Items, and Adjournment.

10.6 Changes to the Order of the Agenda. "Changes to the Order of the Agenda" will be an agenda item that is heard soon after the Council meeting begins whereby the Mayor, Councilmembers and/or City staff may request a change to the order in which agenda items are to be considered. The Mayor will ask if there are any changes to the order of the agenda. Any requested changes will be made in the form of a motion and a vote will be taken. If there are no requests for changes, the agenda will be taken in the prescribed order.

10.7 Consent Calendar. A Councilmember or any member of the public may request an item be removed from the Consent Calendar. At the Mayor's discretion, items removed from the Consent Calendar may be considered immediately after approval of the balance of the Consent Calendar or elsewhere in the agenda. Councilmembers shall be given the opportunity to ask a clarifying question about a consent item or make a brief comment about an item without having to remove the item from the Consent Calendar.

10.8 Tentative Council Calendar. The Tentative Council Calendar shall list items pending to come before Council within the next 12 months period and will be included as part of each Council Meeting's Agenda Packet. City Staff will post the Tentative Council Calendar on the City's website and make updates to the Tentative Council Calendar, as necessary.

The Tentative Council Calendar shall be included in each City Council regular meeting agenda packet as an Informational Item. Each quarter, the Tentative Council Calendar should be brought to Council as a Discussion Item for Council's review, discussion and possible action. At this time, Councilmembers may request new items be added with the required support from other Councilmembers depending on whether a staff report is required. The Councilmember requesting the item shall state the topic and which Council priority the request aligns to. Council and staff shall agree as to where the new item shall be placed on the Tentative Council Calendar.

10.9 Placing items on a future agenda. Members of the City Council may have any matter that can be legally agendized placed on the agenda of the City Council by indicating their desire to do so under that portion of the City Council agenda designated, "Future City Council Agenda Items." Placing an item on a future agenda requires two Councilmembers to support the item if no staff work is required and three Councilmembers if staff work is required. Unless an item is deemed an urgency exception or emergency exception, as defined in the Norms, Councilmembers shall request the placement of items on future agendas at a public Council meeting.

10.10 Council questions. Councilmembers shall strive to provide questions to city staff on agenda items as early as possible before a council meeting to allow adequate time to respond to the questions. Staff will provide all questions and answers to Council questions to all Councilmembers prior to the subject Council meeting, and, excepting attorney-client communications, to the public as soon as possible. Councilmembers shall strive to notify staff if they plan to raise a specific question at the Council meeting. If a Councilmember feels they need additional information to make a decision on an item, and the item is not time sensitive, the Councilmember may request the item be continued to a future meeting during Changes to the Order of the Agenda.

10.11 Emergency Meetings. The City Council may hold an emergency meeting (as defined in State Law) without complying with either the 24-hour notice requirement, or the 24-hour posting requirement, or both of the notice and posting requirements.

SECTION 11. PROCEDURES FOR THE CONDUCT OF PUBLIC MEETINGS

11.1 Role of Mayor.

A. The Mayor is responsible for running the meeting. If the Mayor is unavailable to run a Council meeting, the Vice Mayor shall run the meeting. The Mayor shall be responsible for

maintaining the order and decorum of meetings. It shall be the duty and responsibility of the Mayor to ensure that the rules of operation and decorum contained herein are observed. The Mayor shall maintain control of communication between Councilmembers and among Council, staff and public. The Mayor has the prerogative to be the last Councilmember to vote on an item. The Mayor and Councilmembers are responsible to self-monitor their own conduct and speaking time to ensure a timely meeting.

B. Communication with Councilmembers

1. Councilmembers shall request the floor from the Mayor before speaking.
2. When one member of the Council has the floor and is speaking, other Councilmembers shall not interrupt or otherwise disturb the speaker.

C. Communication with Members of the Public Addressing the Council

1. The Mayor shall open the floor for public comment as appropriate.
2. Councilmembers may question a person addressing the Council at the conclusion of the person's comments or upon expiration of the person's time to speak.
3. Any staff member with an item on the agenda will be available to the City Council to answer questions arising during discussions between Councilmembers and among Councilmembers and members of the public.
4. Members of the public shall direct their questions and comments to the Council.

11.2 Rules of Order. The City Council adopts no specific rules of order except those listed herein. The City Council shall refer to *Rosenberg's Rules of Order*, as a guide for the conduct of meetings, with the following modifications:

A. Although permitted, a motion is not required prior to a general discussion on an agenda item. A pre-motion discussion allows the members to share their thoughts on the agendized item so that a motion can more easily be made that takes into account what appears to be the majority position.
B. All motions, except nominations, require a second.
C. A motion may be amended at the request of the maker and the consent of the person who seconded the motion. Such a procedure is often used to accommodate concerns expressed by other members.
D. A motion to amend may still be used.

The Mayor has the discretion to impose reasonable rules at any particular meeting based upon facts and circumstances found at any particular meeting. These latter rules will be followed unless objected to by a majority of the City Councilmembers present.

11.3 Appeal Procedures. Appellants shall be given the opportunity to speak first. Appellants and applicants responding to appeals may be given a total of up to 10 minutes each to present their positions to the City Council prior to hearing public comments. Appellants shall be given up to 5 minutes of rebuttal time after public comments are heard.

11.4 Public Hearing Procedures. All land use public hearing items shall follow the following procedures:

A. Staff presentation and/or report followed by clarifying questions from the Council
B. Disclosure of communications: Councilmembers shall disclose all personal communications with any individual, including, but not limited to, the project applicant,

prospective project applicants, neighboring property owners, residents, or any other party regarding development projects. These disclosures shall include a full description of the nature of the discussion, and in particular, any information not presented as part of the public record

C. The Mayor shall open the public hearing
    a. Applicant presentation; the applicant shall be given a total of up to 10 minutes to present to the City Council
    b. The Council shall take public comments
    c. Applicant rebuttal period; the applicant shall be given a total of up to 5 minutes rebuttal time. If there are no public comments, the applicant shall not be given time for rebuttal
D. The Mayor shall close the public hearing
E. Council discussion, consideration, and decision

11.5 Staff and Consultant Reports. Staff and consultant reports will be given a limit of up to 10 minutes. Staff is to assume that the Council has read all materials submitted. Council shall be given an opportunity to ask questions of staff prior to hearing public comments.

11.6 Public Comment.

A. Persons present at meetings of the City Council may comment on individual items on the agenda. During Regular City Council meetings, comments may be offered on items not on the agenda under that portion of the agenda identified for Public Comment.

B. The limit for speakers will be 1 to 3 minutes, depending on the number of speakers, and the number of items that the Council is discussing at that meeting.

    A group of speakers may designate a single speaker to represent the group. The designated speaker would be given the time which would have been allocated to others (to a maximum of 10 minutes) to speak. Individuals wanting to delegate time to another must be present at the meeting and must indicate their desire to cede time to a single individual by noting on a speaker card they are doing so. Persons who have ceded their time will not be permitted to speak on the topic at that meeting. Members of the public are not permitted to cede their time during quasi-judicial proceedings.

C. In order to facilitate an orderly meeting, anyone wishing to address the City Council is asked to fill out a Request to Speak card, indicating their name, address, and agenda item number/topic. A separate card is requested for each item. The request to speak cards shall be turned into the City Clerk before the item is heard by the City Council.

D. Upon addressing the Council, each speaker is requested, but not required, to first state his/her/their/their name, whom they represent and/or city of residence.

E. After the speaker has completed their remarks, Councilmembers may ask questions of the speaker after being acknowledged by the Mayor. Councilmembers shall be respectful of the speakers and shall not enter into a debate with any member of the public.

F. Upon conclusion of the Public Comment section for any item, the Mayor may provide Councilmembers and/or staff with an opportunity to respond to statements made by the public.

G. All Councilmembers shall listen to all public discussion as part of the Council's community responsibility. Individual Councilmembers should remain open-minded to comments made by the public.

H. The Mayor has the right to ask a member of the public to step down if over the allotted time or if comments are not germane.

11.7 Motions. It will be the practice of the City Council for the Mayor to provide Councilmembers an opportunity to ask questions of staff, comment on, and discuss any agendized item in order to help form a consensus before a motion is offered. After such discussion, the Mayor or any Councilmember may make a motion. Before the motion can be considered or discussed, it must be seconded. Once a motion has been properly made and seconded, the Mayor shall open the matter to full discussion offering the first opportunity to speak to the moving party, and thereafter, to any Councilmember recognized by the Mayor. Customarily, the Mayor will take the floor after all other Councilmembers have been given the opportunity to speak.

If a motion clearly contains divisible parts, any Councilmember may request the Mayor or moving party divide the motion into separate motions to provide Councilmembers an opportunity for more specific consideration.

Tie Votes: Tie votes shall be lost motions. When all Councilmembers are present, a tie vote on whether to grant an appeal from official action shall be considered a denial of such appeal, unless the Council takes other action to further consider the matter.

If a tie vote results at a time when less than all members of the Council, who may legally participate in the matter, are present, the matter shall be automatically continued to the agenda of the next regular meeting of the Council, unless otherwise ordered by the Council.

11.8 Reconsideration of a Council Action.

A. Request for Reconsideration by a member of the public.

Any member of the public may request that a member of the City Council that voted in the majority request reconsideration. In order for that member of Council to take action, such request must be received no later than 5:00 p.m. on the third day following the decision. The requestor should specify in writing the reason for the request to reconsider. The Councilmember would then need to follow the procedure described in Section B below.

B. Request for Reconsideration by a Councilmember

1. Request by a member of the City Council.

Only a member of the City Council who voted in the majority may request reconsideration. The request may be made at the same meeting, or 24 hours in advance of the posting of the agenda for the next regular meeting. The request needs to be supported by two (2) Councilmembers, including the requesting Councilmember, for it to be added to the agenda. A request added to an agenda shall be structured in a manner that a motion for reconsideration may be considered immediately following approval of the request for reconsideration.

In presenting a request for reconsideration, the City Councilmember making the request should state orally or in writing the reason for the request, without dwelling on the specific details or setting forth various arguments.

2. Motion for Reconsideration.

A motion to reconsider an action taken by the City Council may be made at the same meeting at which the action was taken (including an adjourned or continued meeting), or in accordance with Section 11.8B1. A motion to reconsider an action may be made only by a Councilmember who voted in the majority but may be seconded by any Councilmember and is debatable.

The motion must be approved by a majority of the entire City Council. At the time such motion for reconsideration is heard, testimony shall be limited to the facts giving rise to the motion.

C. Effect of Approval of Motion.

Upon approval of a motion to reconsider, and at such time as the matter is heard, the City Council shall only consider any new evidence or facts not presented previously with regard to the item or a claim of error in applying the facts.

If the motion to reconsider is made and approved at the same meeting at which the initial action was taken and all interested persons (including applicants, owners, supporters, and opponents) are still present, the matter may be reconsidered at that meeting or at the next regular meeting or intervening special meeting (subject to the discretion of the maker of the motion) and no further public notice is required.

If the motion to reconsider is made and approved at the same meeting at which the initial action was taken but all interested persons are not still present, or if the motion is made and approved at the next regular meeting or intervening special meeting, the item shall be scheduled for consideration at the earliest feasible City Council meeting and shall be re-noticed in accordance with the Government Code, the City Municipal Code and the Council Norms and Procedures. The Clerk shall provide notice to all interested parties as soon as possible when a matter becomes the subject of a motion to reconsider.

11.9 Council Discussions and Deliberations.

A. The discussion and deliberations at meetings of the City Council are to secure the mature judgment of Councilmembers on proposals submitted for decision. This purpose is best served by the exchange of thought through discussion and debate.

To the extent possible, Councilmembers should disclose any ex parte communication prior to discussion on an item.

Discussion and deliberation are regulated by these rules in order to assure every member a reasonable and equal opportunity to be heard.

B. Obtaining the Floor for Discussion.

After the Council has commented on an issue, and a motion has been stated to the Council and seconded, any member of the Council has a right to discuss it after obtaining the floor. The member obtains the floor by seeking recognition from the Mayor. A member who has been recognized should limit his/her/their time to 3 minutes.

C. Speaking More Than Once.

To encourage the full participation of all members of the Council, no member or members shall be permitted to monopolize the discussion of the question. If a Councilmember has already spoken, other Councilmembers wishing to speak shall then be recognized. No Councilmember shall be allowed to speak a second time until after all other Councilmembers have had an opportunity to speak.

D. Relevancy of Discussion.

All discussion must be relevant to the issue before the City Council. A Councilmember is given the floor only for the purpose of discussing the pending question; discussion which departs is out of order. Councilmembers shall avoid repetition and strive to move the discussion along. Arguments, for or against a measure, should be stated as concisely as possible.

A motion, its nature, or consequences, may be debated vigorously. It is never permissible to attack the motives, character, or personality of a member either directly or by innuendo or implication. It is the duty of the Mayor to instantly rule out of order any Councilmember who engages in personal attacks. It is the motion, not its proposer, that is subject to debate.

It is the responsibility of each Councilmember to maintain an open mind on all issues during discussion and deliberation. It is not necessary for all City Councilmembers to speak or give their viewpoints if another Councilmember has already addressed their concerns.

E. Mayor's Duties During Discussion.

The Mayor has the responsibility of controlling and expediting the discussion. A Councilmember who has been recognized to speak on a question has a right to the undivided attention of the Council.

It is the duty of the Mayor to keep the subject clearly before the members, to rule out irrelevant discussion, and to restate the question whenever necessary.

F. After the Vote.

Once a majority of the Council has approved a motion, no further discussion shall be made unless the item is brought for reconsideration as described previously.

11.10 Councilmember Respect. Councilmembers shall abide by the majority decision of the Council, even if in the minority. Councilmembers appointed to serve on regional boards and committees shall maintain the Council's position on an item, even if the Councilmember disagrees with that position.

11.11 Council and Staff Reports and Directions on Future Agenda Items. Council and staff reports at the end of Council meetings shall be limited to announcing Council, Regional Board activities on which Councilmembers serve, City and City-sponsored activities. Community groups may announce their activities during Public Comments at the beginning of Council meetings.

11.12 Conflict of Interest. If a Councilmember becomes aware of a potential conflict of interest that would require the Councilmember to not participate in a discussion or vote on an agenda item before the City Council, the Councilmember should discuss with the City Attorney prior to agenda item being heard by the City Council. The Councilmember is expected to follow the direction of the City Attorney. If the Councilmember decides to request an opinion from the California Fair Political Practices Commission ("FPPC"), the Councilmember shall disclose at the next scheduled Council Meeting that such a request has been made. If the Councilmember is still waiting for the FPPC opinion at the time the agenda item will be heard by the City Council, the Councilmember may abstain from participating until the FPPC opinion is received. Upon receiving the FPPC opinion, the Councilmember shall share the opinion with the City Council and public at the next scheduled Council meeting.

SECTION 12. CLOSED SESSIONS

12.1 Purpose. It is the policy of the City Council to conduct its business in public to the greatest extent possible. However, state law recognizes that, in certain circumstances, public discussion could potentially jeopardize the public interest, compromise the City's position, and could cost the taxpayers of Los Altos financially. Therefore, closed sessions shall be held from time to time as allowed by law. The procedures for the conduct of these meetings shall be the same as for public meetings, except that the public will be excluded for the closed session portion of the meeting.

Prior to convening the closed session portion of the meeting, the Mayor or City Clerk shall publicly announce the closed session items and ask for public input regarding any items on the closed session agenda.

City Councilmembers shall keep all written materials and verbal information provided to them in closed session in complete confidence to ensure that the City's position is not compromised. No mention of information in these materials shall be made to anyone other than Councilmembers, the City Attorney or City Manager, except where authorized by a majority of the City Council.

12.2 Rule of Confidentiality. The City Council recognizes that breaches in confidentiality can severely prejudice the City's position in litigation, labor relations and real estate negotiations. Further, breaches of confidentiality can create a climate of distrust among Councilmembers and can harm the Council's ability to communicate openly in closed sessions, thereby impairing the Council's ability to perform its official duties.

The City Council further recognizes that confidentiality of discussions and documents are at the core of a closed session. Confidentiality is essential if the closed session is to serve its purpose. Therefore, the City Council will adhere to a strict policy of confidentiality for closed sessions.

12.3 Breach of Rule of Confidentiality. No person who attends a closed session may disclose any statements, discussions, or documents used in a closed session except where specifically authorized by State law. Any authorized disclosure shall be in strict compliance with these rules and the Ralph M. Brown Act. Violation of this rule shall be considered a breach of this rule of confidentiality.

12.4 Agenda. The agenda for a closed session will contain that information required to be disclosed pursuant to the Ralph M. Brown Act.

12.5 Permissible Topics. All closed sessions will be held in strict compliance with the Ralph M. Brown Act. The City Attorney, or his/her/their designee, will advise in advance on topics that may be discussed in a closed session.

12.6 Rules of Decorum.

A. The same high standard of respect and decorum as apply to public meetings shall apply to closed sessions. There shall be courtesy, respect and tolerance for all viewpoints and for the right of Councilmembers to disagree. Councilmembers shall strive to make each other feel comfortable and safe to express their points of view. All Councilmembers have the right to insist upon strict adherence to this rule.
B. Prior to a vote, the Mayor shall ensure that the motion is clearly stated and clearly understood by all Councilmembers.
C. The Mayor shall keep the discussion moving forward so that debate and a vote can occur in the time allotted for the closed session. The Mayor will determine the order of debate in a fair manner.

12.7 Conduct of Meeting.

A. The Mayor will call the closed session to order promptly at its scheduled time.
B. The Mayor will keep discussion focused on the permissible topics.
C. The use of handouts and visual aids such as charts is encouraged to focus debate and promote understanding of the topic. All such materials are strictly confidential.
D. If the City Council in closed session has provided direction to City staff on proposed terms and conditions for any type of negotiations, whether it be related to property acquisitions or disposal, a proposed or pending claim or litigation, or employee

negotiations, all contact with the other party will be through the designated City person(s) representing the City in the handling of the matter. A Councilmember, not so designated by the Council, will not under any circumstances have any contact or discussion with the other party or its representative concerning the matter, which was discussed in the closed session, and will not communicate any discussions conducted in closed session to such party.

12.8 Public Disclosure After Final Action.

A. The Ralph M. Brown Act requires that, as a body, the City Council make certain public disclosure of closed session decisions when those actions have become final. Accordingly, the Mayor or the City Attorney shall publicly report any final action taken in closed session, and the vote, including abstentions, as directed by the Ralph M. Brown Act.
B. The report may be oral or written. The report will state any reportable action taken by the Council and how each Councilmember voted, if applicable. All other closed session discussions will remain confidential. Unless authorized by the majority of the City Council and if permitted under applicable law, the report will not state the debate or discussion that occurred.

SECTION 13. DECORUM

13.1 Councilmembers. Members of the City Council value and recognize the importance of the trust invested in them by the public to accomplish the business of the City. Councilmembers shall accord the utmost courtesy to each other, City employees, and the public appearing before the City Council. When speaking, a Councilmember's tone should remain neutral and non-verbal communication aspects should be considerate and polite. Formal business attire is required only when Council meetings, workshops, or study sessions are held in Community Meeting Chambers and/or televised.

13.2 City Employees. Members of the City staff shall observe the same rules of order and decorum applicable to the City Council. City staff shall act at all times in a business and professional manner towards Councilmembers and members of the public.

13.3 Public. Members of the public attending City Council meetings shall observe the same rules of order and decorum applicable to the City Council. City Code Chapter 2.05, *Public Meeting Rules for Conduct*, shall apply to all City Council Meetings.

13.4 Noise in the Chambers. Noise emanating from the audience, whether expressing opposition or support within the Community Meeting Chambers or lobby area, which disrupts City Council meetings, shall not be permitted. All cellular phones and other consumer electronic devices shall be muted while in the chambers. Refusal is grounds for removal.

SECTION 14. VIOLATIONS OF PROCEDURES

Unless otherwise approved by at least a majority of Councilmembers or prohibited by law or due to circumstances beyond the City's control, for example, a declared state of emergency, all Councilmembers are required to comply with these Norms and Procedures.

Nothing in these Norms and Procedures shall invalidate a properly noticed and acted upon action of the City Council in accordance with State Law.

This document shall remain in effect until modified by the City Council.

AMENDED AND APPROVED: September 14, 2021.

APPENDIX A

ROSENBERG'S RULES OF ORDER

City of Los Altos 2023 Tentative Council Agenda Calendar

All items and dates are tentative and subject to change unless a specific date has been noticed for a legally required Public Hearing. Items may be added or removed from the shown date at any time and for any reason prior to the publication of the agenda eight days prior to the next Council meeting.

Date	Agenda Item (Date identified by Council)	Agenda Section (Consent, Discussion Item - note in red if Public Hearing)	Dept/ Date of request to add.
February 14, 2023	**STUDY SESSION - City Council Priority #9: Business Communities – 5:30 pm Start time**	Study Session	Anthony
	REGULAR COUNCIL MEETING		
	Design Contract for S 1st Street scape	Consent	Jim
	Acceptance of the Council Chamber AV project	Consent	Aida
	Contract Amd for Bear Electric	Consent	Jim
	Housing Element Implementing Resolutions	Public Hearing	Nick
	Commission Appointment recommendations	Discussion	Anthony
	Acceptance of the on-call sewer spot repair project	Consent	Aida
	Commission Handbook/Commission Meeting updates	Discussion	Jon
	Emergency Declaration – Ending emergency	Consent	Jon
	Mid-Year Budget FY23	Discussion	June
February 21, 2023	**COUNCIL RETREAT – 5 PM START**		
February 28, 2023	**REGULAR COUNCIL MEETING**		
	March to be YOUTH ARTS MONTH - Proclamation	Special Item	
	Assembly Bill AB 1276	Public Hearing	Aida
	Restriction of Firearms on Public Property (JW/NF/AE 7/12)	Discussion	Angela
	Treasury Report	Consent	June
	License Plate Readers	Discussion	Angela
	Military Equipment Use Report	Consent	Katie/ Angela

City of Los Altos Tentative Council Agenda Calendar

All items and dates are tentative and subject to change unless a specific date has been noticed for a legally required Public Hearing. Items may be added or removed from the shown date at any time and for any reason prior to the publication of the agenda eight days prior to the next Council meeting.

Date	Agenda Item (Date identified by Council)	Agenda Section (Consent, Discussion Item - note in red if Public Hearing)	Dept.
	Future Agenda Item Policy Update	Discussion	Anthony
March 14, 2023	**REGULAR COUNCIL MEETING**		
	Downtown Theater Study Update	Discussion	Anthony
	Reach Codes	Public Hearing	Nick
	Prop 218 Process	Info	Aida
	Award the sewer system repair program project	Consent	Aida
	Acceptance of the CCTV Video Inspection; Project WW01011	Consent	Aida
March 28, 2023	**REGULAR COUNCIL MEETING**		
	Reach Codes	Public Hearing	
	Treasury Report	Consent	June
	Investment Policy	Consent	June
	SCVURPPP MOA	Consent	Aida
April 11, 2023	**REGULAR COUNCIL MEETING**		
April 25, 2023	**REGULAR COUNCIL MEETING**		
	Treasury Report	Consent	June
May 9, 2023	**REGULAR COUNCIL MEETING**		
	3rd Quarter Report		
May 23, 2023	**REGULAR COUNCIL MEETING**		
	Treasury Report	Consent	June
June 13, 2023	**REGULAR COUNCIL MEETING**		

City of Los Altos Tentative Council Agenda Calendar

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Date	Agenda Item (Date identified by Council)	Agenda Section (Consent, Discussion Item - note in red if Public Hearing)	Dept.
	Adopt Resolution No. 2022-XX approving the Report of Sewer Service Charges and directing the Filing of Charges for Collection by the Tax Collector	**2 Printed Public Hearing** - - not less than 10 days - published once a week for two consecutive weeks 5/11/2022 & 5/18/2022	
	Adopt 2024 Budget	**Public Hearing**	June
June 27, 2023	**REGULAR COUNCIL MEETING**		
	Treasury Report	Consent	June
	Adopt 2024 Budget	Consent	June
July 11, 2023	**REGULAR COUNCIL MEETING**		
August 22, 2023	**REGULAR COUNCIL MEETING**		
	Treasury Report	Consent	June
September 12, 2023	**REGULAR COUNCIL MEETING**		
September 26, 2023	REGULAR COUNCIL MEETING		
	Year End tentative report – September (if needed)		
	Treasury Report	Consent	June

City of Los Altos Tentative Council Agenda Calendar

All items and dates are tentative and subject to change unless a specific date has been noticed for a legally required Public Hearing. Items may be added or removed from the shown date at any time and for any reason prior to the publication of the agenda eight days prior to the next Council meeting.

Date	Agenda Item (Date identified by Council)	Agenda Section (Consent, Discussion Item - note in red if Public Hearing)	Dept.
October 10, 2023	REGULAR COUNCIL MEETING		
October 24, 2023	REGULAR COUNCIL MEETING		
	Treasury Report	Consent	June
November 14, 2023	REGULAR COUNCIL MEETING		
	1st Quarter report FY 2021/2022		
November 28, 2023	REGULAR COUNCIL MEETING		
	Treasury Report	Consent	June
December 5, 2023	**Council Reorganization**		
December 12, 2023	REGULAR COUNCIL MEETING		
	CAFR and Year End – 1st meeting December		

Future Agenda Topics To Be Scheduled….

Proposed City policy that modifies the environmental analysis standard for circulation impacts from a Level of Service (LOS) analysis to a Vehicle Miles Traveled (VMT) analysis.	Public Hearing	
League of California Cities – Role and Representation	Presentation/Discussion	Council Initiated

City of Los Altos Tentative Council Agenda Calendar

All items and dates are tentative and subject to change unless a specific date has been noticed for a legally required Public Hearing. Items may be added or removed from the shown date at any time and for any reason prior to the publication of the agenda eight days prior to the next Council meeting.

Date	Agenda Item (Date identified by Council)	Agenda Section (Consent, Discussion Item - note in red if Public Hearing)	Dept.
Subcommittee on Grants			NF 03.25.2022
Comprehensive multi-modal traffic study (analysis of recent projects projected parking, trip generation, & traffic impacts to actuals; ECR impacts should include adjacent streets)			ES
PCI Report			
Funding mechanisms for housing and housing programs – Nick			
Open Government Cmte			
MWENDO – Council			
Dark Skies Ordinance (LLE/AE/NF 7/12)			
Update to personnel rules– HR		Consent	HR
Cities Association JPA – Council		Discussion	Angel
Compassion Training (LLE, AE)		Discussion	Council
Noise Ordinance		Discussion	Council
Airplane Noise Subcommittee		Discussion	NF and SM
Flag Policy Pilot, 2nd Nov Meeting 2023		Discussion	Council
Sewer Rate Study		Discussion	Aida

City of Los Altos Tentative Council Agenda Calendar

All items and dates are tentative and subject to change unless a specific date has been noticed for a legally required Public Hearing. Items may be added or removed from the shown date at any time and for any reason prior to the publication of the agenda eight days prior to the next Council meeting.

Date	Agenda Item (Date identified by Council)	Agenda Section (Consent, Discussion Item - note in red if Public Hearing)	Dept.
Ceding Time		Discussion	Anthony
Legislative Subcommittee		Discussion	
City Council Norms and Procedures		Discussion	
Leaf Blower Enforcement		Discussion	
SVCE Electrification Grant		Consent	Aida
HEU Implementation, Study Session		Study Session	
Council Accountability Policy (JW, SM, PD)		Discussion	
Bicycle parking ratio ordinance		Discussion	Nick

AGENDA REPORT SUMMARY

Meeting Date: **January 24, 2023**

Subject **Independent Intake Official (IIO) Yearly Report**

Prepared by: Katie Krauss, Captain
Reviewed by: Angela Averiett, Chief of Police
Approved by: Gabriel Engeland, City Manager

Attachment(s):
1. Los Altos Council Report
2. 2022 Table of Formal Complaints
3. 2022 Table of Informal Complaints

Initiated by:
Stephanie Atigh, Independent Intake Official

Previous Council Consideration:
3/8/22, 2021 Yearly Report prepared for Council on Consent Calendar

Fiscal Impact:
None

Environmental Review:
Not applicable

Policy Question(s) for Council Consideration:
Not applicable

Summary:
- In November 2020, in response to recommendations from the Citizens' Police Task Force, the City Council directed the Police Department to initiate changes to the police complaint intake process including submitting complaints to an Independent Intake Official (IIO).
- The IIO prepares an annual report on complaints for Council review.

Staff Recommendation:
None

Reviewed By:

City Manager	City Attorney	Finance Director
GE	JH	JF

Subject: **Independent Intake Official (IIO) Yearly Report**

Purpose
To inform Council of the informal and formal complaints for calendar year 2022

Background
In November 2020, in response to recommendations from the Citizens' Police Task Force, the City Council directed the Police Department to initiate changes to the police complaint intake process including submitting complaints to an Independent Intake Official (IIO). The IIO prepares an annual report on complaints for Council review.

Discussion/Analysis
IIO Council Report and Tables included as attachments for Council review.

Recommendation
None

REPORT TO CITY COUNCIL

BACKGROUND

In November 2020, in response to recommendations from the Citizens' Police Task Force, the City Council directed the Police Department to initiate changes to the police complaint intake process including submitting complaints to an Independent Intake Official (IIO).

For the past two years, Stephanie Atigh, Attorney at Law, has been serving as the Independent Intake Official.

INDEPENDENT INTAKE OFFICIAL

The Independent Intake Official provides the following services:

Contracts with the city of Los Altos

Accepts complaints from the public

Shares complaints with the Police Department so that the administration can process the complaint

Accepts and logs complaints that were initially sent to the Police Department

Monitors the progress of complaints to ensure timely processing

Holds names of complainants confidential from the Police Department if requested

Generates an annual report to the city summarizing all police complaints received. The IIO Annual Report will not include personal identifying information about complainants or Department member.

The Independent Intake Official **does not provide** the following:

The IIO does not work for the Los Altos Police Department.

The IIO does not conduct investigations.

The IIO has no authority to change the result of an investigation.

The IIO will not release a complainant's name to the Police Department if the complainant wishes to remain anonymous.

INDEPENDENT INTAKE OFFICIAL'S ANNUAL REPORT FOR 2022

Personnel complaints are classified in 5 categories: Informal, formal, incomplete, decline to investigate, and exceptional clearance. This report summarizes complaints received in 2022.

A complaint can be classified as **incomplete** if the complaining party either refuses to cooperate or becomes unavailable after diligent follow-up investigation. At the discretion of the assigned supervisor or the Internal Affairs Unit, such matters may be further investigated depending on the seriousness of the complaint and the availability of sufficient information.

A complaint may be classified as **decline to investigate** when (1) the alleged incident could not have occurred based on the details the complainant provides that could best be described as hallucinatory in nature; (2) a reasonably objective person would assume the complainant's description of the circumstances is based upon information that is clearly made up or imaginary; (3) the complainant's description of the incident is based on what a reasonably objective person would describe as an implausible conspiracy theory; or (4) the complainant previously made the same complaint against a Department member and that complaint has previously been investigated and a disposition reached.

An **exceptional clearance complaint** is one in which the initial investigation of the complaint reveals that the misconduct alleged in the complaint did not occur, based on immediately available evidence and/or recorded media. Complaint investigators will complete formal written documentation of the incident using the Internal Affairs Investigation Report Format to explain why the case cleared exceptionally.

FORMAL COMPLAINTS

A formal complaint is a matter in which the complaining party requests further investigation or in which a Department supervisor determines that further action is warranted. Such complaints may be investigated by a Department supervisor of rank greater than the reported employee or referred to the Operations Commander depending on the seriousness and complexity of the investigation. If an investigation of a formal complaint discloses misconduct or improper job performance that was not alleged in the original complaint, the investigator will respond appropriately to those additional allegations.

The disposition of a formal complaint is classified in one of the following:

Unfounded: when the investigation discloses that the alleged acts did not occur or did not involve Department members. Complaints that are determined to be frivolous will fall within the classification of unfounded (Penal Code § 832**.**8).

Exonerated: When the investigation discloses that the alleged act occurred but that the act was justified, lawful, and/or proper.

Not sustained: When the investigation discloses that there is insufficient evidence to sustain the complaint or fully exonerate the officer.

Sustained: A final determination by an investigating agency, commission, board, hearing officer, or arbitrator, as applicable, following an investigation and opportunity for an administrative appeal pursuant to Government Code § 3304 and Government Code § 3304.5 that the actions of a Department member were found to violate law or department policy (Penal Code § 832.8).

No Finding: When the complainant fails to provide information promised or necessary to complete the investigation, the complainant is no longer available to clarify details needed to make a finding in the case, or the complainant has advised that he or she is no longer willing to cooperate in the investigation.

Complaint Withdrawn: When the complainant affirmatively indicates the desire to withdraw his/her complaint.

A summary of four (4) formal complaints received in 2022 is provided in Table 1 attached to this report. In 2021 two (2) formal complaints were received.

INFORMAL COMPLAINTS

An informal complaint is a matter in which the complaining party is satisfied that appropriate action has been taken by a Department supervisor of rank greater than the reported employee. Informal complaints need not be documented on a personnel complaint form, and the responsible supervisor shall have the discretion to handle the complaint in any matter consistent with this policy.

An informal complaint is considered “resolved” when the complainant expresses satisfaction to the Department’s representative about the Department’s response to the complaint, and the complainant does not ask for further action by the Department. An informal complaint is considered “closed” when the concerns articulated in the complaint have been addressed by Department personnel, but the complainant is unable to be reached to discuss their level of satisfaction.

A summary of fourteen (14) informal complaints received in 2022 is provided in Table 2 attached to this report. The Department received 14 informal complaints in 2021.

COMPLAINTS WHERE IDENTITY OF COMPLAINANT IS KEPT CONFIDENTIAL BY INDEPENDENT INTAKE OFFICIAL

A complainant can request that his/her identity be maintained only by the Independent Intake Official and not shared with members of the Department. In 2022, the IIO did not receive any such complaints while in 2021, the IIO received two (2).

In 2022, the Independent Intake Official also received six complaints relating to activities of civilians, not Los Altos Police Department personnel. In each case, the complainant was notified that the Independent Intake Official could not assist with the complaint, and the complainant was directed to contact the appropriate city department, if any.

Table 1

FORMAL COMPLAINTS 2022

Reporting Date	Complaint Number	Complaint Type	Community or Dept Initiated	Racial or Bias Related	Use of Force Related	General Description	Reporting Method	Disposition
2/26/22	22-006	Formal	Community	No	No	Insufficient investigation	Phone call to Department	Sustained
6/5/22	22-017	Formal	Community	No	No	Rudeness	Written complaint	Pending; Currently under investigation
6/24/22	22-018	Formal	Department Initiated	No	No	Violation of standards of conduct off duty	Department Initiated	Pending; Currently under investigation
9/19/22	22-016	Formal	Community	No	No	Insufficient investigation	In Person	Exceptional clearance

INFORMAL COMPLAINTS 2022

Reporting Date	Complaint Number	Complaint Type	Community or Dept Initiated	Racial Bias	Use of Force Related	General Description	Reporting Method	Disposition
1/7/22	22-001	Informal	Community	Yes	No	Unfairly asked to leave vaccination clinic	Email to Police Feedback	Incomplete
1/19/22	22-002	Informal	Community	No	No	Poor listening skills; lack of empathy	Email to Police Feedback	Incomplete
1/19/22	22-004	Informal	Community	No	No	Insufficient Investigation	Email to Police Feedback	Resolved
2/2/22	22-012	Informal	Community	No	No	Insufficient Investigation	Phone call to Department	Resolved
2/14/22	22-003	Informal	Community	No	No	Improper placement of radar trailer	Email to Police Feedback	Resolved
3/22/22	22-007	Informal	Community	No	No	Rudeness	In Person Visit to Department	Resolved
3/29/22	22-008	Informal	Community	No	No	Insufficient response; no arrest made	Email to Police Feedback	Exceptional Clearance

4/15/22	22-009	Informal	Community	Yes	No	Rudeness	Email to Police Feedback	Resolved
5/24/22	22-010	Informal	Community	No	No	Insufficient response	Email to Police Feedback	Exceptional Clearance
6/1/22	22-011	Informal	Community	No	No	Stalking, theft, vandalism by officer	Phone call to City Manager	Unfounded
6/13/22	22-014	Informal	Community	No	No	Insufficient Investigation	Email to City Council member	Exceptional Clearance
6/14/22	22-013	Informal	Community	No	No	Insufficient Investigation	Email to Police Feedback	Resolved
8/1/22	22-015	Informal	Community	No	No	Rudeness	Email to PoliceWeb	None (complaint involved ex-employee)
11/27/22	22-019	Informal	Community	No	No	Rudeness	Phone call to Department	Resolved