

Los Altos High School 500 West Wing Expansion

Addendum to the Approved 2019 LAHS Expansion IS/MND

Prepared by

MVLA

HIGH SCHOOL DISTRICT

In Consultation with



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SECTION 1.0 INTRODUCTION AND PURPOSE

1.1 INTRODUCTION

A Notice of Determination was filed on January 7, 2019, following approval of the Los Altos High School Expansion Initial Study/Mitigated Negative Declaration (IS/MND) by the MV-LA High School District Board. The IS/MND analyzed improving and expanding the Los Altos High School campus, including constructing a new two-story 31,350 square-foot classroom building, a one-story 4,376 square-foot engineering laboratory and classroom building, an approximately 32,200 square-foot student services building, and an approximately 9,800 square-foot auxiliary gymnasium building, as well as reconfiguring the existing cafeteria and food services building, modernizing the gym, installing artificial turf at existing fields, and converting spaces that were proposed to be vacated in the student services building to library use. The project anticipated 410 additional students above existing enrollment numbers at Los Altos High School, increasing student enrollment at Los Altos High School from 2,234 to 2,644 students. The Los Altos High School is located at 201 Almond Avenue in Los Altos (refer to Figures 1.1-1, 1.1-2, and 1.1-3).

The Mountain View/Los Altos Union High School District (the District), which is in the process of implementing the approved 2019 campus expansion, is now proposing modifications to the planned Los Altos High School expansion project (modified project). The original campus expansion project did not include, and the IS/MND did not evaluate, modifications to the 500 West Wing, which consists of a storage unit located south of the campus pool. The District now proposes to demolish the 1,823 square foot 500 West Wing building and replace it with a 2,502 square foot one-story building consisting of two multi-use rooms and an athletic director's office. The multi-use rooms would provide space for uses such as PE, classrooms, sports, etc. The modifications to the 500 West Wing would not be in support of accommodating additional students beyond the additional 410 students evaluated in the 2019 IS/MND.

1.2 PURPOSE OF THE ADDENDUM

The California Environmental Quality Act (CEQA) recognizes that between the date an environmental document is certified and the date the project is fully implemented, one or more of the following changes may occur: 1) the project may change; 2) the environmental setting in which the project is located may change; 3) laws, regulations, or policies may change in ways that impact the environment; and/or 4) previously unknown information can arise. Before proceeding with a project, CEQA requires the Lead Agency to evaluate these changes to determine whether or not they affect the conclusions in the environmental document.

CEQA Guidelines Section 15162 (Cal. Code Regs., tit. 14, §§15000, *et seq.*) states that when an EIR has been certified or a Negative Declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the Lead Agency determined, on the basis of substantial evidence in light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant

environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified or the Negative Declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

In addition to identifying the conditions requiring the preparation of a subsequent EIR or negative declaration, Section 15163 of the CEQA Guidelines further clarifies when a supplement to an EIR, rather than a subsequent EIR, may be prepared. A supplement to an EIR may be prepared if:

1. Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and
2. Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

CEQA Guidelines Section 15164 states that the Lead Agency (i.e., the District) or a Responsible Agency shall prepare an addendum to a previously certified EIR or Negative Declaration if some changes or additions are necessary, but none of the conditions described in Section 15162 or 15163 (see above) calling for preparation of a subsequent or supplemental EIR or Negative Declaration have occurred.

This Addendum analyzes the demolition of the 1,823 square foot 500 West Wing and the construction of a 2,502 square foot one-story building with two multi-use rooms and an athletic director's office under Section 15164.

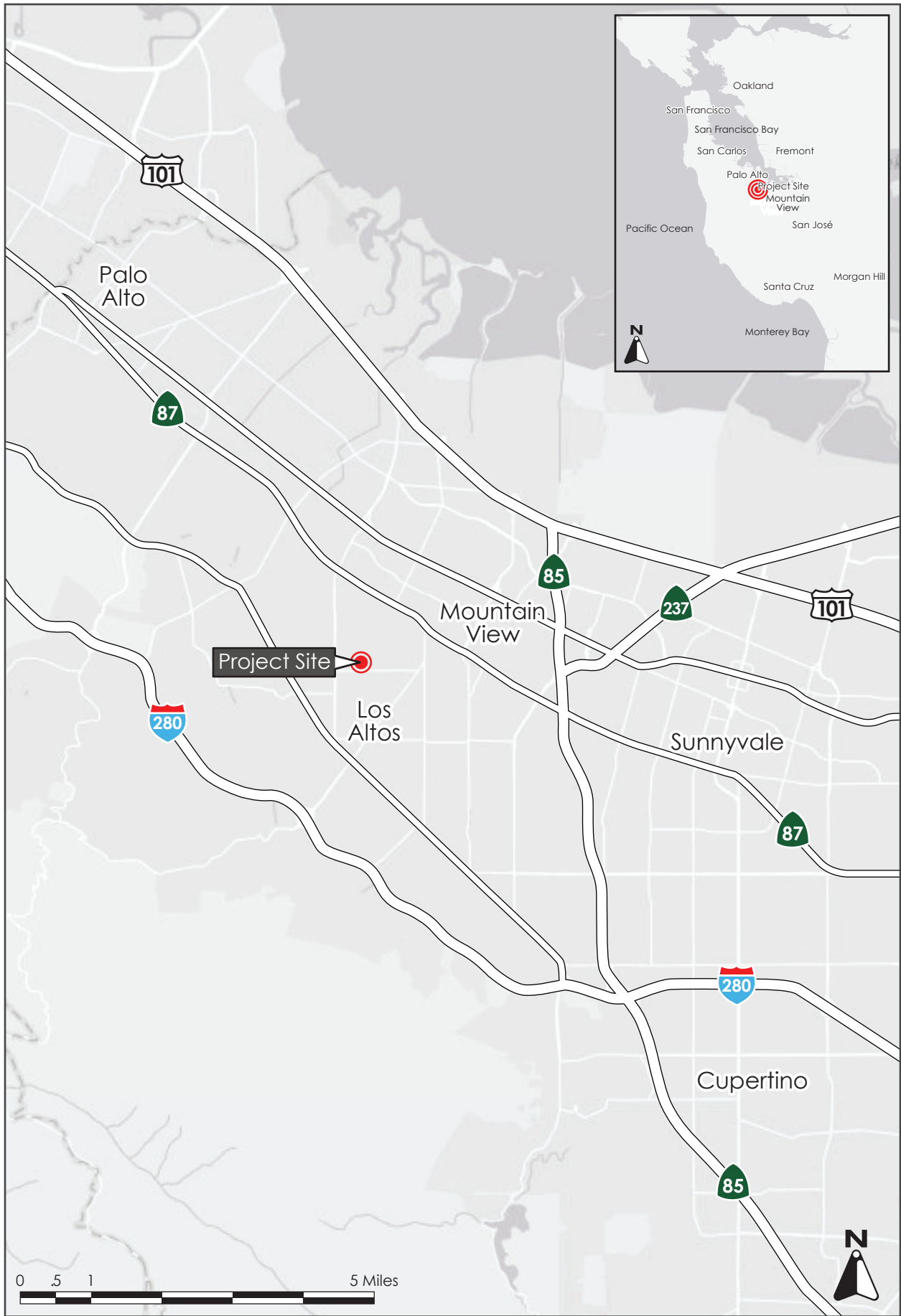
Based on the modified project description and knowledge of the project site (based on the environmental review prepared for the 2019 IS/MND), the District has concluded that the modified project would not result in any new impacts not previously disclosed in the IS/MND and would not result in a substantial increase in the magnitude or severity of any significant environmental impacts

previously identified in the IS/MND. For these reasons, an Addendum to the IS/MND has been prepared for the modified project.

This Addendum will not circulate for public review, but will be attached to the IS/MND, pursuant to CEQA Guidelines Section 15164(c).¹ Though this Addendum does not need to be circulated for public review, it will be provided to the Board and public as part of a Board meeting agenda pursuant to the Brown Act.

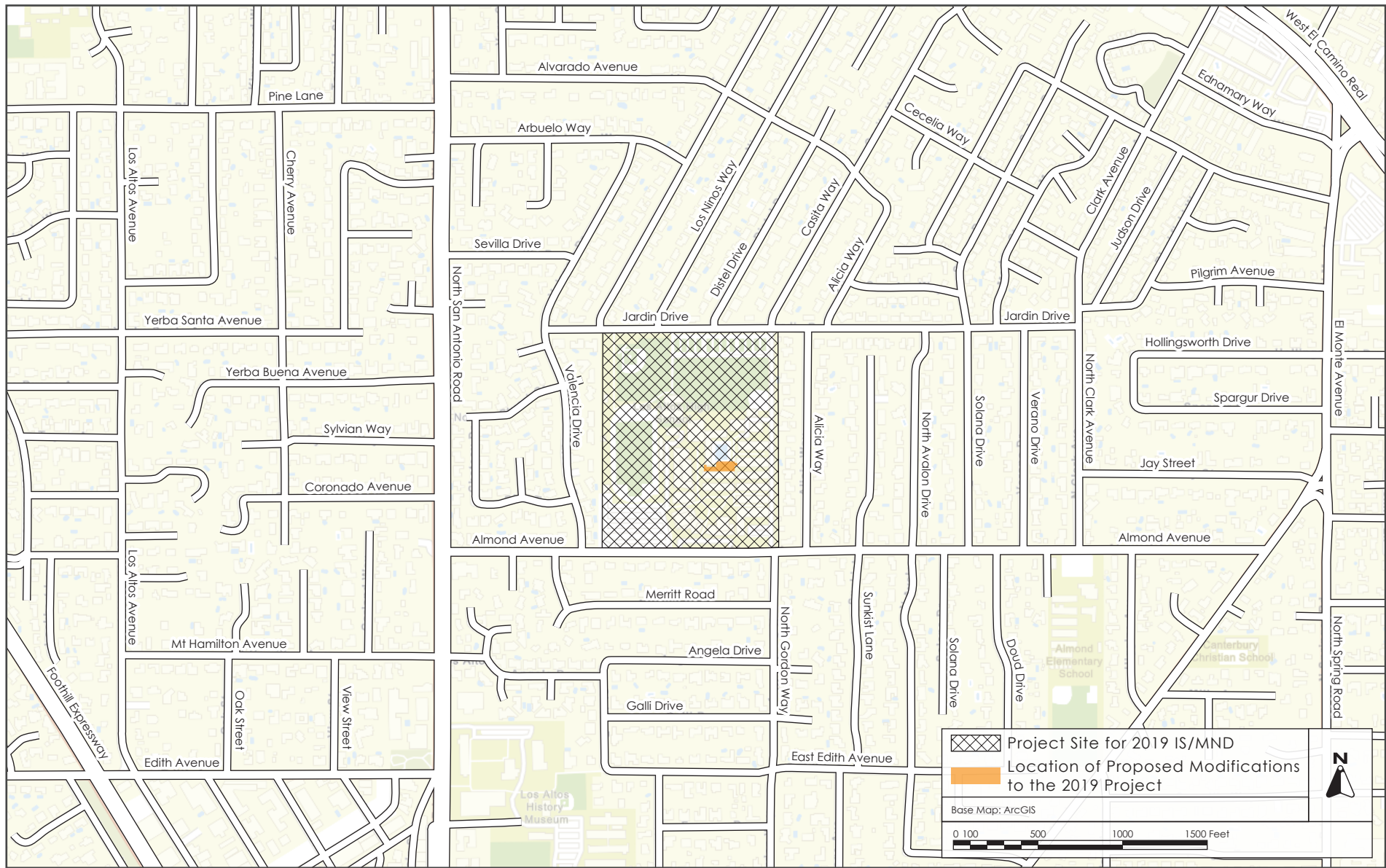
The 2019 IS/MND is available on the CEQAnet website at <https://ceqanet.opr.ca.gov/2011092005/4>.

¹ If the lead agency elects to prepare an addendum, the addendum need not be circulated for public review, but can be included in or attached to the final EIR (or MND). (CEQA Guidelines §15164(c).) “A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency’s required findings on the project, or elsewhere in the record. This explanation must be supported by substantial evidence.” (CEQA Guidelines §15164(e).)



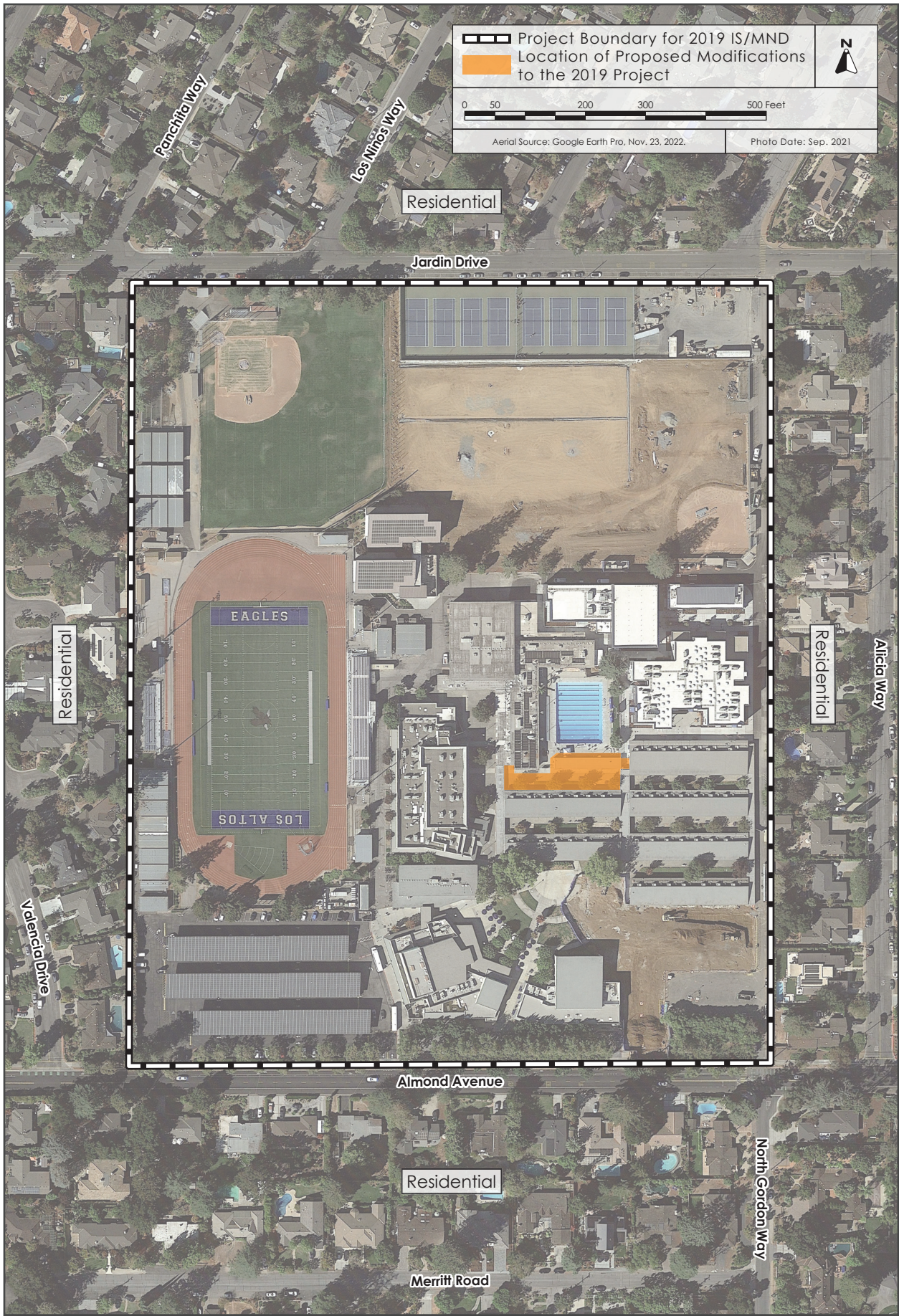
REGIONAL MAP

FIGURE 1.1-1



VICINITY MAP

FIGURE 1.1-2



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

FIGURE 1.1-3

SECTION 2.0 PROJECT INFORMATION

2.1 SUMMARY OF THE APPROVED PROJECT

The approved project proposed to improve and reconfigure the Los Altos High School campus. In summary, the proposed project included the following elements:

- **Classroom Building:** The two-story (up to 38 feet in height), approximately 33,310 square foot classroom building would be constructed to the east of the existing swimming pool. The classroom building would include three flex labs, 22 classrooms and a culinary arts classroom (for a total of 26 new classrooms), a staff collaboration room, conference rooms, student and staff restroom facilities, elevator, electrical rooms, and exterior walkways. The new building would meet the demands of increased enrollment and allow for the replacement of dilapidated portable classrooms.
- **New Engineering Lab:** The project also proposes to construct an approximately 4,657 square foot one-story engineering laboratory and classroom building (approximately 17 feet in height), immediately north of the classroom buildings. The proposed new engineering lab would house two science labs, one classroom, and two storage rooms.
- **Auxiliary Gymnasium Building:** The project proposes to construct a 13,758 square-foot two-story auxiliary gymnasium building (approximately up to 36 feet two inches in height), including a multi-purpose athletic space and a basketball gym. The auxiliary gym building would be located just east of the main gym. The multi-purpose athletic space would include gymnastics equipment and telescoping bleachers and would be used to accommodate a variety of uses including gymnastics, movement/exercise, testing, and performing arts. The basketball gym would include cushioned wood flooring and moveable bleachers. The athletic space could be divided utilizing a moveable wall.
- **Student Services Building:** An approximately 32,200 square-foot student services building would be constructed on the southeastern corner of the campus. The proposed student services building would be the primary point of contact for the public and would house a reception area, administration offices, conference rooms, a college and career center, academic counseling, staff lounge and work room, and a student union.
- **Interim Classrooms:** Interim or temporary classrooms would be provided at Los Altos High School to accommodate the students in preparation to start demolition and construction of the new classroom structures. The District would temporarily place 16 temporary classrooms, each at 960 square feet, one Admin Building at 960 square feet, and two restrooms' buildings at 480 square feet per building. The location of the temporary facilities is located along the west side of the baseball field and the stadium.
- **Other Improvements and Modifications:** The proposed project includes other various improvements and modifications to the campus, including the following:
 - Improved campus entry
 - Reconfiguration of the existing cafeteria and food services building to be more efficient and to expand into spaces relocated to student services,
 - Expanding Library / Tutoring services into spaces that have been relocated to the new student services Building,
 - Modernization of the large gym,

- Installation of artificial turf at existing fields (approximately 75,000 square feet), which would be available for more frequent use,
- Replace Building 700 exterior stairs, and
- Improvements to the music building.
- **Building Demolition:** To accommodate the new classroom building, gymnasium and new engineering lab (approximately 78,570 square feet), the structures proposed to be demolished are:
 - Existing small gym and 600 Wing building accounting for 6,100 square foot of demolition.
 - Ten portable classrooms and four permanent classrooms accounting for a total of 16,800 square feet of demolition.

To accommodate the construction of new student services building (32,200 square feet), the structures proposed to be demolished are:

- 100 wing building and Administration building accounting for 16,500 square feet of demolition area.

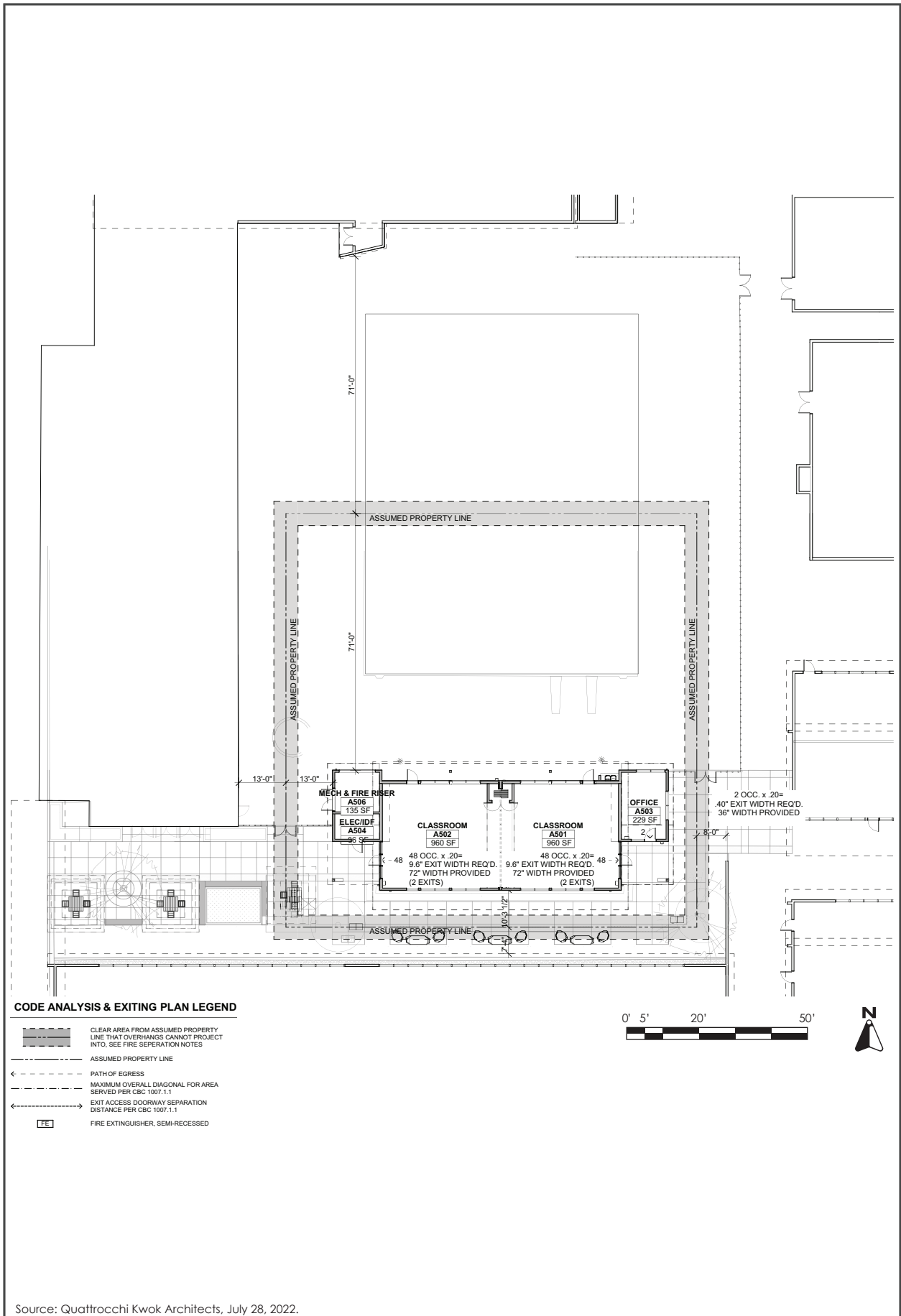
The project, as fully described in the IS/MND, anticipated 410 additional students above existing enrollment numbers at Los Altos High School, increasing student enrollment at Los Altos High School from 2,234 to 2,644 students. The IS/MND estimated that approximately 20 additional staff would be needed at Los Altos High School to serve the increased student enrollment, including 16 teachers and up to four support staff. The project was analyzed to result in a net of 12 new classrooms.

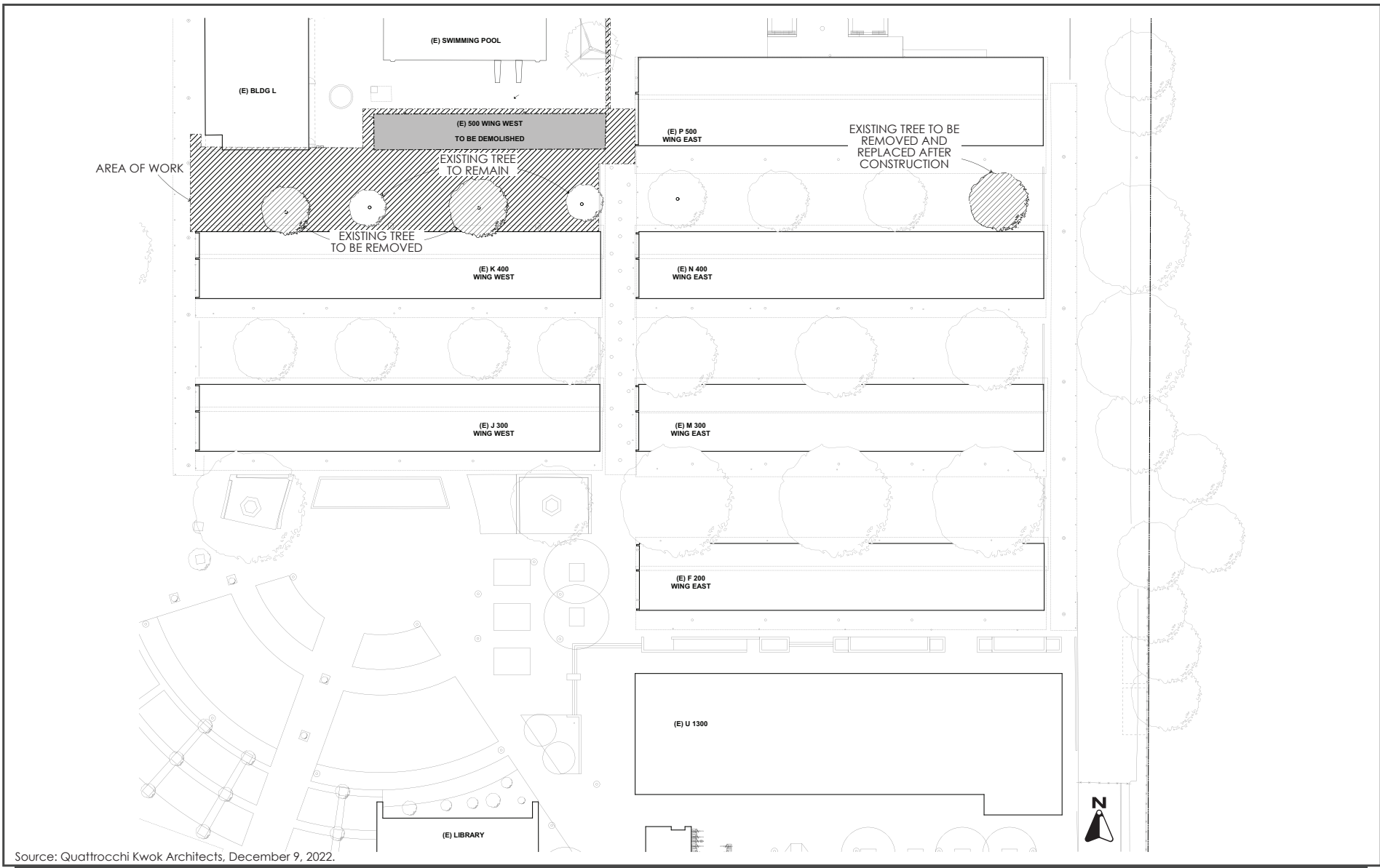
2.2 MODIFIED PROJECT DESCRIPTION

The modified project would construct all the approved project components. In addition, the modified project would include the demolition of the existing 1,823 square-foot 500 West Wing and construction of a 2,502 square foot one-story, approximately 21 feet tall building with two multi-use rooms and an athletic director’s office. The multi-use rooms would provide space for uses such as PE, classrooms, sports, etc. The project site plan can be seen in Figure 2.2-1.

While the project approved in 2019 did not include the removal of any trees on site, an Addendum to the IS/MND was completed in 2019 that revised the project to include the removal of six trees. The current 2023 modified project would remove three additional trees and plant two new trees (see Figure 2.2-2 and Figure 2.2-3).

Demolition of the existing Wing 500 structure and construction of the proposed one-story building is expected to take approximately one year, and would occur concurrently with the construction previously analyzed and approved under the IS/MND.

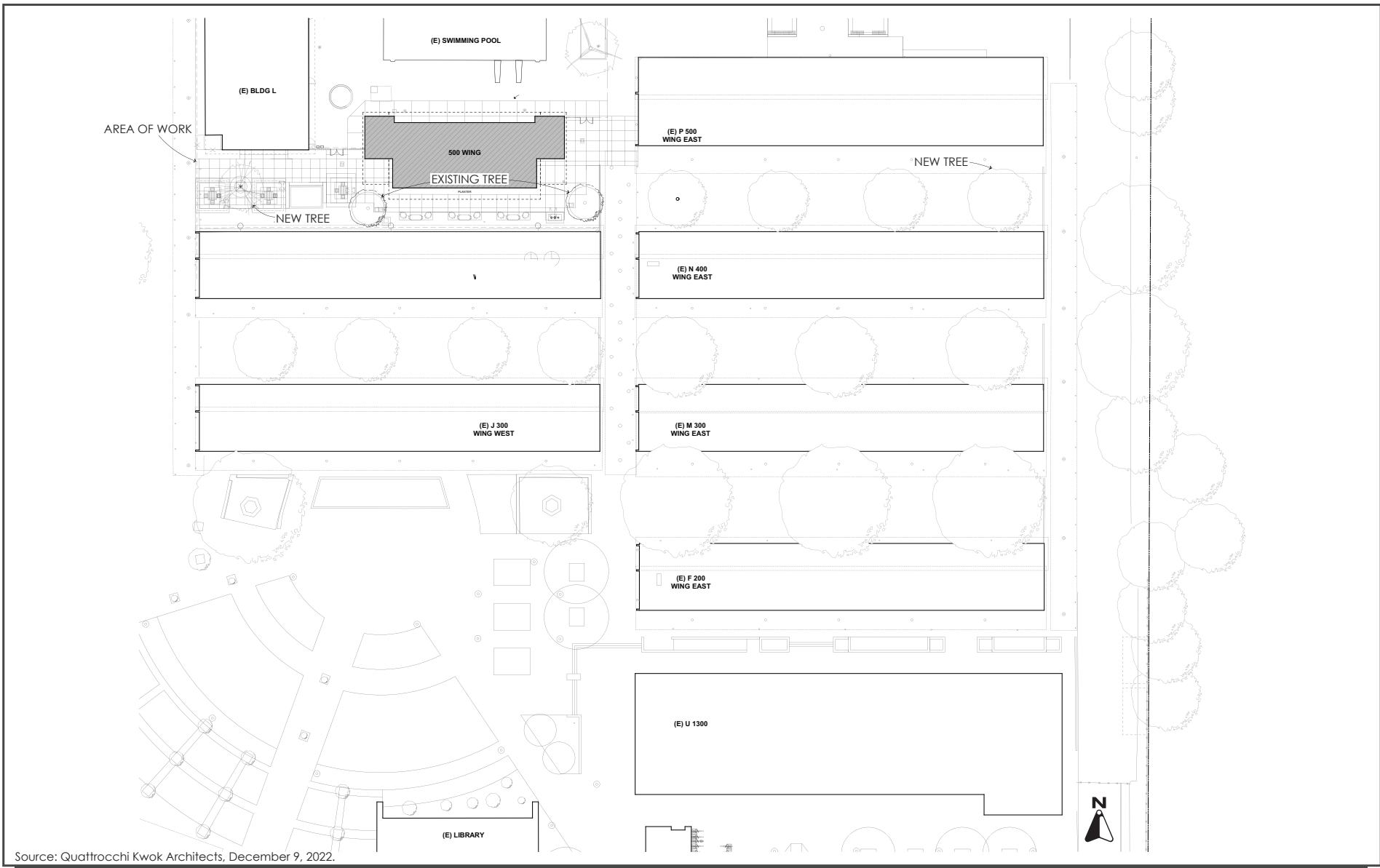




Source: Quattrocchi Kwok Architects, December 9, 2022.

TREE REMOVAL PLAN

FIGURE 2.2-2



Source: Quattrocchi Kwok Architects, December 9, 2022.

TREE REPLACEMENT PLAN

FIGURE 2.2-3

SECTION 3.0 ENVIRONMENTAL IMPACTS

The discussion below describes the environmental impacts of the 2023 modified project compared to the impacts of the 2019 approved project. Also noted are any changes that have occurred in the environmental setting that would result in new impacts or impacts of greater severity than those identified in the previously adopted IS/MND. This Addendum only addresses those resource areas which would be potentially affected by the proposed changes to the 2019 approved project. The 2023 modified project would have the same impacts regarding the following environmental issues:

4.1	Aesthetics	4.11	Mineral Resources
4.2	Agriculture and Forestry Resources	4.13	Population and Housing
4.6	Geology and Soils	4.14	Public Services
4.8	Hazards and Hazardous Materials	4.15	Recreation
4.9	Hydrology and Water Quality	4.17	Utilities and Service Systems
4.10	Land Use and Planning		

The proposed modifications to the approved 2019 project would not alter the analysis in the 2019 IS/MND with regard to the above listed resource areas because:

- The one-story building would be located well within the interior of the Los Altos High School campus, and therefore the proposed new building would not be visible from the surrounding neighborhood. The project site has minimal to no scenic views due to the existing built environment and no designated scenic resources. The security lighting on and around the proposed structure would be similar to the existing security lighting on the project site.
- There are no agricultural and forestry resources, mineral resources, or risk of wildfire on-site or in the area. The project modifications do not affect these existing conditions. The project modifications would not result in the loss of availability of a known mineral resource or a mineral resource recovery site.
- The project modifications would result in a small increase in demolition and construction on-site. As found in the 2019 IS/MND, construction could expose construction workers to elevated levels of man-made contaminants and naturally occurring asbestos. The revised project would be required to implement the required mitigation measures (MM HAZ-1, MM HAZ-2.1, and MM HAZ-2.2) as well as standard measures included in the approved IS/MND. By implementing these measures, the project modifications would not result in a new or increased impact from hazardous materials.
- The project modifications, along with the rest of the approved construction activity, would comply with C.3 requirements under the Municipal Regional Stormwater Permit and therefore would not result in construction or post-construction water quality impacts.
- The project modifications would be designed and constructed in accordance with the California Building Code. Mitigation measure MM GEO-1 of the IS/MND would be implemented to ensure the proposed modifications do not result in a new geologic and soil impact due to expansive soil conditions.
- Since the Lead Agency for the project is the Mountain View-Los Altos Union High School District, the project is not subject to the land use regulations of the City of Los Altos. The

project site is not part of an approved habitat conservation plan or natural community conservation plan.

- The project modifications would not result in any increases in population or any corresponding increases in demand for housing, public services, recreation facilities, or utilities.
- The proposed modification would result in a slight decrease in impervious surfaces (2.3%) compared to existing conditions. The proposed modifications would include a 132 square-foot bioretention area to treat stormwater and would consist of approximately 2,294 square feet of pervious surfaces.
- The proposed project would not result in the division of an established community.

3.1 EVALUATION OF IMPACTS

This Addendum addresses the modified project’s impacts to the following resource areas compared to those of the 2019 approved project disclosed in the 2019 IS/MND:

- Air Quality
- Biological Resources
- Cultural Resources
- Greenhouse Gas Emissions (GHG)
- Hazards and Hazardous Materials
- Noise
- Transportation

Since completion of the 2019 IS/MND, the CEQA Guidelines Appendix G Checklist was updated to include the resource areas of Energy, Tribal Cultural Resources, and Wildfires. As a result, this Addendum also addresses those resource areas, which were not included in the original 2019 IS/MND analysis.

3.2 ENVIRONMENTAL SETTING

The approved project site is located entirely on the Los Altos High School campus (campus). The campus is located in the City of Los Altos, California. The project site is bordered by a school access road followed by single-family homes to the east, residential development to the west, Jardin Drive to the north and Almond Avenue to the south. Regional access to the site is provided via I-280, State Route 85, State Route 237, and US 101. Vehicle access to the site is provided via Almond Avenue and Jardin Drive. The project site is located on the east central portion of the 30.6-acre campus. The City of Los Altos Plan Land Use Policy Map designates the project site as *Public School*.

3.3 CHANGES TO PROJECT SETTING

The proposed project revision includes construction of a one-story building in the same vicinity as the approved project. Therefore, the environmental setting for the modified project has not changed substantially from the completed IS/MND and the conditions identified in the approved project would apply to the modified project.

3.4 AIR QUALITY

The changes to the approved project relevant to air quality is the additional site preparation, demolition, and construction required for the modified project. The additional construction would

incrementally increase the duration of use and potentially the number of heavy machinery during overall construction. The following analysis addresses the potential air quality impacts that would result from the additional construction necessary to build the modified project.

Information in this section is based in part on the Update to Air Quality and GHG Analysis Memo provided by Illingworth and Rodkin in November 2022. This is included as Appendix A of this Addendum.

3.4.1 Findings of the Previously Approved IS/MND

The 2018 Air Quality Analysis prepared for the IS/MND predicted construction emissions associated with the project and health risks that the project may cause to nearby sensitive receptors, primarily nearby residents. The analysis evaluated demolition of 39,400 square feet of existing structures on the site and construction of 83,925 square feet of new high school facilities. The analysis found that toxic air contaminant (TACs) emissions associated with the project were potentially significant given the close proximity of residential sensitive receptors to the project site. The construction activities were considered to result in impacts in terms of excess cancer risk to any infants present or increased annual PM_{2.5} concentrations caused by construction equipment, traffic exhaust, and fugitive dust.

The approved project included mitigation to minimize dust during construction activities. Under Mitigation Measure MM AIR-1, the District will ensure that the project contractor implements the following best management practices:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) will be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site will be covered.
- All visible mud or dirt track-out onto adjacent public roads will be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads will be limited to 15 miles per hour (mph).
- All roadways, driveways, and sidewalks to be paved will be completed as soon as possible. Building pads will be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times will be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage will be provided for construction workers at all access points.
- All construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications. All equipment will be checked by a certified mechanic and determined to be running in proper condition 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 will respond and take corrective action within 48 hours. The Air District's phone number will also be visible to ensure compliance with applicable regulations.

The approved project also included mitigation to reduce TAC emission impacts during all demolition and construction activities. Under Mitigation Measure MM AIR-2, the District will ensure that the project contractor implements the following measures:

- All mobile diesel-powered off-road equipment larger than 25 horsepower and operating on the site for more than two days will meet U.S. EPA particulate matter emissions standards for Tier 4 or use engines that include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices (VDECs). Alternatively (or in combination), the use of alternatively fueled or electric equipment (i.e., non-diesel) would be consistent with this requirement.
- Avoid diesel generator use by supplying line power to the construction site and limiting the use of diesel generators to no more than 50 total hours.
- Avoid staging of construction equipment near portions of the site that are adjacent to residences.

The IS/MND concluded that implementation of the proposed project would result in a less than significant air quality impact, i.e., health risks below applicable Bay Area Air Quality Management District (BAAQMD) thresholds, with the above mitigation incorporated.

3.4.2 Air Quality Impacts Resulting from the Modified Project

The proposed project revision would consist of an additional 1,823 square-feet of demolition and construction of a 2,502 square-foot building. Therefore, compared to the overall construction program for the approved project, demolition activities would increase by five percent and construction emissions would likely increase by three percent. These changes are not anticipated to be substantially different than the approved project as overall construction activity (in terms of demolition, earthwork, and building construction) would be similar. Demolition of the existing 500 West Wing and construction of the replacement building would take approximately one year. This would not significantly increase the amount of construction equipment operational on-site during the approved project's construction period. The demolition and construction of the 500 West Wing would take place concurrently with the construction previously analyzed and approved under the IS/MND.

The revised project is anticipated to have similar air quality impacts as the original project that was evaluated in the 2019 IS/MND. Updates to the construction modeling were not necessary to Illingworth & Rodkin's analysis because construction assumptions are not anticipated to significantly change². As a result, an increase in emissions and/or new impacts that require additional mitigation measures would not be anticipated given the minor changes. The project site acreage and building size are similar to those modeled originally. The mitigation measures in the IS/MND would reduce impacts well below the BAAQMD thresholds, providing allowances for the increases proposed under the revised project conditions. Therefore, even with the construction increases of the revised project, impacts would be less than significant with the mitigation of the original IS/MND.

² A significant change would be a change of greater than 25 percent.

3.5 BIOLOGICAL RESOURCES

The changes to the approved project relevant to biological resources are the removal of three trees and construction adjacent to trees. The removal of the trees is in addition to the trees previously identified for removal in the approved 2019 Addendum to the IS/MND. The following analysis addresses the potential biological resources impacts that would result from the construction of the modified project.

3.5.1.1 Findings of the Previously Approved IS/MND and Addendum

The Los Altos High School Expansion project IS/MND concluded that implementation of the approved project would result in a less than significant biological resources impact. The project site is located within a developed area and therefore habitat is considered extremely low in species diversity. There are no sensitive habitats on or adjacent to the project site and special-status plant and animal species are not expected to occur on the project site, therefore the project was found to have a less than significant impact on special status species. No sensitive natural communities or riparian habitat exist on the project site and therefore the approved project was found to have no impact to sensitive natural communities. The project would not conflict with any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat plan. There are no wetlands on or adjacent to the project site and therefore the project was found to have no impacts to wetland or water way resources within the jurisdiction of the U.S. Army Corps of Engineers, the California Department of Fish and Wildlife, or the Regional Water Quality Control Board.

The project site contains numerous landscape trees that could provide nesting habitat for birds, including migratory birds and raptors. The approved project included mitigation for the avoidance of nesting birds during construction which required avoiding the nesting season (February 1 – August 31), if feasible (Mitigation Measure MM BIO-1). If tree removal cannot be avoided during the nesting seasons, pre-construction surveys for nesting raptors and other migratory nesting birds would be conducted by a qualified ornithologist to identify active nests that may be disturbed during project implementation on-site and within 250 feet of the site. The pre-construction surveys would be conducted prior to initiation of construction, demolition activities, or tree removals no more than 14 days prior to initiation of construction activities during the early part of the nesting season between February 1st and April 30th (inclusive) and no more than 30 days prior to initiation of construction activities during the late part of the nesting season between May 1st and August 31st (inclusive).

If an active nest is found in or close enough to the project area to be disturbed by construction activities, a qualified ornithologist, in consultation with the California Department of Fish and Wildlife, would determine the extent of a construction-free buffer zone (typically 250 feet for raptors and 100 feet for other birds) around the nest, to ensure that raptor or migratory bird nests would not be disturbed during ground disturbing activities. The construction-free buffer zones would be maintained until after the nesting season has ended and/or the ornithologist has determined that the nest is no longer active. With the incorporation of this mitigation, the approved project was determined to have a less than significant impact on nesting birds.

The project did not propose removal of the existing landscape trees in the IS/MND, however trees located adjacent to the proposed additions and improvements could be harmed during project

construction. To ensure that all existing trees on and adjacent to the project site were properly protected during construction activities, the IS/MND incorporated tree preservation and protection measures (Mitigation Measure MM BIO-2). Consistent with Chapter 11.08 of the Los Altos Municipal Code, prior to commencement of construction, construction fencing would be placed around the drip line of all trees proposed for preservation. No grading or other construction would occur within the drip line of any tree proposed for preservation except in conformance with a Tree Protection Plan approved by the City Arborist. No vehicle, equipment or materials would be parked or stored within the drip line of any tree proposed for preservation. No signs, wires, or any other object would be attached to a tree.

The project did not propose removal of the existing landscape trees in the IS/MND, however the 2019 Addendum to the IS/MND evaluated the removal of six trees as the District considered modifications to the project that required their removal. The six trees included four Pittosporum trees measuring nine inches in diameter and one cherry and one chestnut tree measuring up to 13 inches in diameter. As outlined in the City of Los Altos Tree Protection Ordinance (LAMC Chapter 11.08), all trees, regardless of species, that are 48-inches or larger in circumference (approximately 15-inches in diameter) are protected and require a Tree Removal Permit before they can be removed. None of the trees were protected nor required a tree removal permit.

The approved project would comply with all local policies or ordinances protecting biological resources, including General Plan policies and the City's Tree Protection Ordinance, therefore the project's impact on polices protecting biological resources was found to be less than significant.

3.5.1.2 Biological Impacts Resulting from the Modified Project

The modified project would require the removal of three additional trees (see Figure 2.2-2). As outlined in the City of Los Altos Tree Protection Ordinance (Los Altos Municipal Code Chapter 11.08), all trees, regardless of species, that are protected trees require a Tree Removal Permit before they can be removed. A protected tree is defined as:

- A. Any tree that is 48 inches in circumference measured at 48 inches above grade;
- B. Any tree designated by the historical commission as a heritage tree or any tree under official consideration by the historical commission for heritage tree designation;
- C. Any tree which was required by the city to be either saved or planted in conjunction with a development review application.

Community Design and Historic Resources Element Three of the City's General Plan reiterates the requirements of Chapter 11.08 of the Municipal Code. The three trees proposed from removal are pictured below.



All three trees have circumferences below 48 inches, are not designated nor being considered for status as heritage trees by the historical commission, and were not required to be saved or planted by the City with a development review application. Therefore, the three trees to be removed are not considered protected trees and therefore a Tree Removal Permit is not required.

In the absence of a standard required replacement ratio, the project would plant two replacement trees, as shown in Figure 2.2-3.

The additional trees that would be removed by the modified project have limited habitat value because the surrounding area consists of the developed high school. The 2019 IS/MND for the approved project determined that construction during bird nesting seasons would create impacts to birds in trees adjacent to construction activities. Removal of the three trees proposed by the modified project as well as construction near existing trees south of the existing 500 West Wing has the

potential to affect nesting birds. As discussed above, Mitigation Measure MM BIO-1 and MM BIO-2 from the IS/MND specifically address measures designed to minimize the impact of tree removal and construction required as part of the project to a level that is less than significant. The modified project would be required to comply with Mitigation Measure MM BIO-1 and MM BIO-2; therefore, the modified project would not result in new or more significant impacts to nesting birds or trees.

As stated above, the project site does not contain wetland areas or riparian habitat. Additionally, there are no natural communities within the project site. Therefore, the modified project would not result in new or more significant impacts related to these impact areas.

The modified project would be required to comply with General Plan policies and the City's Tree Protection Ordinance. Therefore, the modified project would not result in impacts on biological resource protection policies.

3.6 CULTURAL RESOURCES

The change to the approved project relevant to cultural resources is that three years have passed since the approval, and therefore additional site features may now be considered of historic age. If a property is over 50 years old, retains its integrity and has association with one or more criteria of significance, then it is eligible for designation as a Historic Resource.³

3.6.1 Findings of the Previously Approved IS/MND

None of the buildings on campus met the criteria for listing on the Cal Register nor the City of Los Altos Historic Resources Inventory Evaluation criteria. The IS/MND concluded that the site did not have any historical resources under CEQA, and therefore, the project would not have a significant effect on any historic resources.

The potential for subsurface archaeological or paleontological resources to be encountered during construction of the proposed project was considered low. However, the IS/MND included MM CUL-1, MM CUL-2, and MM CUL-3 to reduce impacts to archaeological resources in the event any are encountered during site development. Under MM CUL-1, all work within 50 feet of a cultural resource find would stop and a qualified professional archaeologist or paleontologist would examine the find. If the find were determined to be significant, treatment recommendations would be developed and implemented before earthmoving or construction activities could recommence within the designated resource area. Under MM CUL-2, all work on the site will stop immediately if vertebrate fossils are discovered until a qualified professional paleontologist can assess the nature and importance of a find and recommend appropriate treatment. Under MM CUL-3, if human remains are discovered during construction, construction activities that could disturb the remains and any associated artifacts would halt and the project proponent would contact the county Coroner's Office and the Native American Heritage Commission (NAHC). The project was considered to have a less than significant impact on cultural resources with implementation of MM CUL-1 through MM CUL-3.

³ City of Los Altos, *Historic Resources Inventory – Section I*. February 2011, Page I-14.

3.6.1.1 Cultural Resource Impacts Resulting from the Modified Project

A Historic Resource Report was completed for the IS/MND by TreanorHL in 2018. The report concluded that the high school campus, as a whole, did not have historic significance. Buildings on the site constructed from 1954 to 1960 were considered to be original campus buildings while buildings constructed after 1960 were considered secondary to the site. Secondary structures were all deemed to not have historic significance because all primary structures and structures above 50 years of age were found to not have historic significance. The Wing 500 building was constructed in 1968 and considered to be a secondary structure on the campus. Therefore, although the project includes the demolition of a structure now above 50 years in age (the Wing 500 pool storage building), the structure is secondary and therefore does not have historic significance.

Like the approved project, the modified project would implement mitigation measure MM CUL-1 through MM CUL-3. Therefore, the proposed modifications would not result in any new or more significant impacts than disclosed in the 2019 IS/MND.

3.7 ENERGY

3.7.1 Regulatory Framework

As noted above, the CEQA Appendix G checklist in 2018 did not include discussion of energy impacts, as that topic was added via subsequent Guidelines amendments, and therefore a discussion is provided below of the regulatory setting for energy resources.

Energy Star and Fuel Efficiency

At the federal level, energy standards set by the EPA apply to numerous consumer products and appliances (e.g., the EnergyStar™ program). The EPA also sets fuel efficiency standards for automobiles and other modes of transportation.

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2010. Governor Schwarzenegger issued Executive Order (EO) S-3-05, requiring statewide emissions reductions to 80 percent below 1990 levels by 2050. In 2008, EO S-14-08 was signed into law, requiring retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. In October 2015, Governor Brown signed SB 350 to codify California's climate and clean energy goals. A key provision of SB 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable sources by 2030. SB 100, passed in 2018, requires 100 percent of electricity in California to be provided by 100 percent renewable and carbon-free sources by 2045.

Executive Order B-55-18 To Achieve Carbon Neutrality

In September 2018, Governor Brown issued an executive order, EO-B-55-18 To Achieve Carbon Neutrality, setting a statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." The executive order requires

CARB to “ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.” EO-B-55-18 supplements EO S-3-05 by requiring not only emissions reductions, but also that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO₂ from the atmosphere through sequestration.

California Building Standards Code

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6 of the California Code of Regulations (Title 24), was established in 1978 in response to a legislative mandate to reduce California’s energy consumption. Title 24 is updated approximately every three years.⁴ Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.⁵

California Green Building Standards Code

CALGreen establishes mandatory green building standards for buildings in California. CALGreen was developed to reduce GHG emissions from buildings, promote environmentally responsible and healthier places to live and work, reduce energy and water consumption, and respond to state environmental directives. CALGreen covers five categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality.

Advanced Clean Cars Program

CARB adopted the Advanced Clean Cars program in 2012 in coordination with the EPA and National Highway Traffic Safety Administration. The program combines the control of smog-causing pollutants and GHG emissions into a single coordinated set of requirements for vehicle model years 2015 through 2025. The program promotes development of environmentally superior passenger cars and other vehicles, as well as saving the consumer money through fuel savings.⁶

3.7.2 Energy Impacts Resulting from the 2023 Modified Project

The project modifications would not result in wasteful, inefficient, or unnecessary consumption of energy resources. The building would be constructed in accordance with Title 24 and CALGreen standards. The campus includes solar panels to provide on-site renewable electricity. The proposed modifications would not conflict with a state or local plan for renewable energy or energy efficiency. Therefore, the proposed project would have a less than significant energy impact and would not result in a new significant impact.

⁴ California Building Standards Commission. “California Building Standards Code.” Accessed November 21, 2022. <https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo>.

⁵ California Energy Commission (CEC). “2019 Building Energy Efficiency Standards.” Accessed November 21, 2022. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency>.

⁶ California Air Resources Board. “The Advanced Clean Cars Program.” Accessed November 21, 2022. <https://www.arb.ca.gov/msprog/acc/acc.htm>.

3.8 GREENHOUSE GAS EMISSIONS

The change to the approved project relevant to greenhouse gases (GHG) is the additional site preparation, demolition, and construction required for the modified project as well as operation of the building. The additional construction would increase the duration of use and potentially the number of heavy machinery during overall construction. The following analysis addresses the potential GHG impacts that would result from the additional construction necessary to build the modified project and the building operation.

Information in this section is based in part on the Update to Air Quality and GHG Analysis Memo provided by Illingworth and Rodkin in November 2022. This is included as Appendix A of this Addendum.

3.8.1 Findings of the Previously Approved IS/MND

The 2018 Air Quality and GHG Emission Analysis prepared for the IS/MND predicted construction and operational GHG emissions associated with the project. The analysis evaluated demolition of 39,400 square feet of existing structures on the site and construction of 83,925 square feet of new high school facilities. Construction of the approved project was estimated to emit 286 metric tons over the total construction duration, which the IS/MND found to be a less than significant impact.

Annual emissions resulting from operation of the proposed project were predicted to be 325 MT of CO₂e for the year 2021 and 299 MT of CO₂e for the year 2030. The emission per service population for the year 2021 and 2030 were predicted to be 0.8 and 0.7 MT/CO₂e/year/service population, respectively. The 2030 predicted service population emissions would not exceed the “Substantial Progress” bright-line efficiency metric of 660 MT of CO₂e or 2.6 MT CO₂e/year/service population. Therefore, the IS/MND found the project to have less than significant impacts. The approved project was consistent with the City of Los Alto General Plan and generally consistent with the BMPs in the CAP, therefore the IS/MND found the project would have a less than significant impact and would not conflict with implementation of the City’s CAP.

3.8.1.1 Greenhouse Gas Impacts Resulting from the Modified Project

The proposed revisions to the project would not cause a significant increase in GHG emissions from construction or operation when compared to the emissions modeled for the original project. Construction emissions would likely increase by three percent. The modified project would result in negligible increases in energy consumption, water use, and solid waste generation given the change in the project is not intended to accommodate additional students. Therefore, emissions under the revised project would not exceed the thresholds used to judge the significance of the project’s GHG emissions. Both the original project and revised project would emit approximately 325 metric tons of GHGs when completed and slightly less (299 metric tons) in 2030, based on the emissions modeling completed in October 2018. Therefore, the proposed modifications would not result in any new or more significant impacts than disclosed in the 2019 IS/MND.

3.9 HAZARDS AND HAZARDOUS MATERIALS

The changes to the approved project relevant to hazards and hazardous materials are the additional demolition of the existing 500 West Wing and the construction of a two-story building. The

following analysis addresses the potential hazards and hazardous materials impacts that would result from the construction of the 2023 modified project.

3.9.1 Findings of the Previously Approved IS/MND

Construction of the proposed project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and fluids. All hazardous materials would, however, be transported, contained, stored, used, and disposed of in accordance with manufacturers' instructions and would be handled in compliance with all applicable standards and regulations. Construction-related hazardous materials use would be temporary, which does not constitute routine transport, use, or disposal.

The proposed operation of the school is not anticipated to routinely transport and use hazardous materials. For school operations, as proposed by the project, the extent of hazardous materials used in the buildings would generally be limited to those needed for cleaning and maintenance and for some lab work. Compliance with applicable federal, state, and local laws and regulations pertaining to the handling, storage, and disposal of hazardous materials would ensure that no significant hazards to the public or the environment result, if such routine activities were to occur.

Soil samples were collected from the project site and sent to a laboratory to be tested for organochlorine pesticides (OCPs) and pesticide related metals. The lab results showed that man-made contaminants (OCPs and Lead) exceeded the levels established for residential or other sensitive uses (including schools). However, the IS/MND included MM HAZ-1 to reduce impacts from exposure to OCPs and lead to a less than significant level. Under MM HAZ-1, additional soil sampling/testing will be completed to define the lateral and vertical extent of the impacted soil prior to grading. The soil detected above the regulatory standards for residential uses will be excavated and disposed offsite at a permitted facility. The soils that remain will undergo confirmation sampling to ensure their concentrations are below the regulatory thresholds.

Some of the buildings to be demolished or renovated were constructed prior to 1978 and, therefore, may contain asbestos-containing materials (ACMs) and lead-based paint. Construction workers, students, employees, visitors, the general public, and/or the environment could be exposed to these hazardous materials during demolition or renovation of the buildings, if these materials are present. The IS/MND included the following standard measures to avoid impacts related to ACMs and lead-based paint:

- In conformance with local, state, and federal laws, an asbestos building survey and a lead-based paint survey will be completed by a qualified professional to determine the presence of ACMs and/or lead-based paint on the structures proposed for demolition. The surveys will be completed prior to demolition work beginning on these structures.
- A registered asbestos abatement contractor will be retained to remove and dispose of all potentially friable asbestos-containing materials, in accordance with the NESHAP guidelines, prior to building demolition that may disturb the materials. All construction activities will be undertaken in accordance with Cal/OSHA standards, contained in Title 8 of the California Code of Regulations (CCR), Section 1529, to protect workers from exposure to asbestos. Materials containing more than one percent asbestos are also subject to BAAQMD regulations.

- During demolition activities, all building materials containing lead-based paint will be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR 1532.1, including employee training, employee air monitoring and dust control. Any debris or soil containing lead-based paint or coatings will be disposed of at landfills that meet acceptance criteria for the waste being disposed.

The IS/MND found that with implementation of the standard measures identified above, the project would not result in a significant impact related to the release of ACMs and lead-based paint, during building demolition or renovation.

On-site soil samples found concentrations of naturally occurring asbestos (NOA) exceeding the DTSC School Schools Unit criteria. NOA is considered to be a potential health hazard to children at the school and surrounding residents if present above the threshold concentration of 0.01 percent. Also, there are potential health hazards to site workers during construction (earth disturbing) activities if elevated levels of NOA are present. However, the IS/MND included MM HAZ-2.1 and MM HAZ-2.2 to reduce impacts from exposure to NOA to a less than significant level. Under MM HAZ-1, extensive dust control along with perimeter air monitoring confirmation sampling will be implemented during all ground-disturbing construction activities to prevent spreading of asbestos fibers. Under MM HAZ-2.2, the soil in the landscaped areas will be capped with at least six inches of clean imported soils and the soils in the high traffic areas of natural turf on the project site will be capped with at least 12-inches of clean imported soil or hardscape to limit future release of asbestos fibers. Buildings, hardscape, artificial turf, and imported NOA-free soils are acceptable caps. Excess soils with NOA, if off hauled, will have to be disposed at an appropriately licensed landfill.

The IS/MND concluded that with implementation of MM HAZ-2.1 and 2.2, the elevated NOA levels would be mitigated to a less than significant level.

3.9.1.1 Impacts Resulting from the Modified Project

Consistent with the approved project, the modified project would be required to comply with the identified standard measures and mitigation measures. The proposed modifications to the approved project would involve the demolition of an additional building constructed in 1968. As discussed above, the demolition of buildings on the school campus could expose construction workers, students, employees, visitors, the general public and/or the environment to ACMs and lead-based paint. Like the approved project, the modified project would implement the standard measures to avoid impacts related to ACMs and lead-based paint. The proposed modifications to the approved project could also expose construction workers and/or the environment to elevated levels of OCPs, arsenic, and NOA. The modified project would be required to implement MM HAZ-1, MM HAZ-2.1 and MM HAZ-2.2 from the IS/MND. As such, the modified project would not result in a new hazardous materials impact or substantially increase the severity of the previously identified hazardous materials impact.

3.10 NOISE

The change to the approved project relevant to noise is the additional demolition of the Wing 500 building, site preparation, and construction required for the new building. The additional construction

would increase the duration of use and potentially the number of heavy machinery during overall construction. The following analysis addresses the potential noise impacts that would result from the additional construction necessary to build the modified project.

3.10.1 Findings of the Previously Approved IS/MND

The 2019 IS/MND concluded that construction activities would occur only during the allowable hours disclosed in the Los Altos Municipal Code, therefore the project would not generate noise levels in excess of established standards. The project would not result in exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels. The IS/MND also concluded that the project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

The IS/MND determined that noise from mechanical equipment during operation has the potential to exceed noise levels allowed by the City at noise-sensitive land uses in the immediate project vicinity. The IS/MND included Mitigation Measure MM NOI-1 to ensure that noise levels do not create significant impacts on the residential uses in the vicinity of the project. Under MM NOI-1, mechanical equipment will be selected and designed to reduce impacts on surrounding uses to meet the City of Los Altos requirements. A qualified acoustical consultant will be retained by the District to review mechanical noise as the equipment systems are selected in order to determine specific noise reduction measures necessary to reduce noise to comply with the noise limit at the shared property line. Noise reduction measures could include, but were not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers such as enclosures and parapet walls to block the line of sight between the noise source and the nearest receptors.

Construction noise levels from the project were expected to exceed the thresholds at nearby noise-sensitive receptors. The IS/MND included Mitigation Measure MM NOI-2 to ensure that noise levels generated from construction do not create noise impacts at nearby noise-sensitive receptors. Under MM NOI-2, construction activities occurring in Los Altos will be limited to weekdays between 7:00 a.m. and 7:00 p.m. and Saturdays between 9:00 a.m. and 6:00 p.m. Construction activities will not occur 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, where technically and economically feasible, construction activities, including mobile and stationary equipment, will be limited to 75 dBA Lmax in residential districts between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and Saturdays. and to 50 dBA Lmax in residential districts at all other times and days. In addition, a construction noise control plan will be developed that includes the following controls:

- Construct minimum 8-foot high temporary noise barriers to provide a minimum 5 dBA noise reduction for residences within 100 feet of active construction sites. Barriers will be constructed in a manner that eliminates any cracks or gaps in order to effectively screen noise-generating equipment and construction activities located near residences and will interrupt the line-of-sight between the noise source and receiver, to the extent feasible. Examples of suitable noise barriers include noise barriers constructed from plywood sheets (1-inch nominal thickness) or noise control blankets. The contractor will submit the noise barrier plan to the School District prior to issuance of a demolition or grading plan.

- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Unnecessary idling of internal combustion engines should be strictly prohibited.
- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) will be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting will face away from sensitive receptors.
- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- Construction staging areas will be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors.
- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.
- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

The project does not lie within an airport land use plan, within two miles of a public airport, or within the vicinity of a private airstrip. Therefore, the IS/MND concluded that the project would not expose people residing or working in the project area to excessive noise levels.

3.10.1.1 Noise Impacts Resulting from the Modified Project

The proposed project revision would consist of an additional 1,823 square-feet of demolition and construction of a 2,502 square-foot building. Therefore, demolition activities would increase by five percent compared to the approved project demolition program. These changes are not anticipated to be substantially different than the previously studied project as overall construction activity (in terms of demolition, earthwork, and building construction) would be similar. Additionally, the project modifications would be shielded by intervening buildings on-site, which would reduce the level of noise at surrounding property lines. Updates to the construction modeling were not necessary to Illingworth & Rodkin's noise analysis because construction assumptions are not anticipated to significantly change. The mitigation measures in the IS/MND would reduce impacts due to construction and operational noise. Therefore, even with the incremental construction increases of the revised project, impacts would be less than significant with the mitigation of the original IS/MND.

3.11 TRANSPORTATION

3.11.1 Findings of the Previously Approved IS/MND

The approved IS/MND found that the project would result in a less than significant VMT impact. The school location and the area from which the students are drawn from would be the same with or without the expansion, and the project would not result in any redistribution or lengthening of trips. Future students would not travel a greater distance to school than current students, and as such, the VMT per student would be the same. The same was determined to be true for the VMT per staff member at the high school.

The IS/MND found that the project would not result in an increase in hazards due to a design feature. The project would improve entry to the campus by including additional pedestrian walkways and access points which could reduce the exposure time of pedestrians to vehicular traffic in the vicinity of the site. The IS/MND also concluded that the project would not result in inadequate emergency access because the plans would be reviewed by the City's Police and Fire Departments to ensure adequate emergency access and circulation. The IS/MND determined the project would not conflict with adopted policies regarding public transit or bicycle and pedestrian facilities. The project would increase the number of pedestrians and bicyclists using pedestrian and bicycle facilities; however, the existing facilities were determined adequate to meet the increased demand without any improvements other than an additional crosswalk on Jardin Drive near Panchita Way and Los Ninos Way. The project would have a less than significant impact on transit, bicycle, and pedestrian facilities.

3.11.1.1 Transportation Impacts Resulting from the Modified Project

The proposed project modifications would not alter access points or parking lots, and therefore would have no effect on emergency access or circulation.

The Transportation Analysis completed for the approved IS/MND was based on an enrollment increase of 410 students. The level of significance of impacts to VMT, public transit, and bicycle/pedestrian facilities were based on this increase. The project would not increase the number of students; therefore, the proposed modifications would not result in any new or more significant impacts than disclosed in the IS/MND.

3.12 TRIBAL CULTURAL RESOURCES

As noted above, the CEQA Appendix G checklist in 2018 did not include discussion of tribal cultural resources, as that topic was added via subsequent Guidelines amendments, and therefore a discussion is provided below of the regulatory setting for tribal cultural resources.

3.12.1 Regulatory Framework

Assembly Bill 52

Assembly Bill (AB) 52, effective July of 2015, established a new category of resources for consideration by public agencies when approving discretionary projects under CEQA, called Tribal Cultural Resources (TCRs). AB 52 requires lead agencies to provide notice of projects to tribes that

are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Where a project may have a significant impact on a tribal cultural resource, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource or when it is concluded that mutual agreement cannot be reached.

Under AB 52, TCRs are defined as follows:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either:
 - Included or determined to be eligible for inclusion in the California Register of Historic Resources⁷
 - Included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)
- A resource determined by the lead agency to be a TCR.

3.12.2 Tribal Cultural Resources Impacts Resulting from the 2023 Modified Project

Los Altos High School is located at an urban, infill site in Los Altos. There are no known prehistoric or historic archaeological resources on the project site. Moreover, the project site is located approximately 0.8 mile from Hale Creek and approximately 0.9 mile from Adobe Creek. The distance between the site and the creeks/rivers decreases the likelihood that subsurface artifacts may be located on-site. To date, no tribes have contacted the District to request they be notified of projects pursuant to AB 52. There are no known tribal cultural resources on the site.

Even with the low potential for subsurface resources, the IS/MND included mitigation measures MM CUL-1 and MM CUL-3 (as discussed above in Section 3.6) to address yet unrecorded resources if found. Any subsurface artifacts found on-site would be addressed consistent with IS/MND mitigation measures noted above. Therefore, the proposed project would have a less than significant impact on tribal cultural resources and would not result in a new significant impact.

3.13 WILDFIRE

The project site is not in an area that has been designed as a very high fire hazard severity zone on California Office of the State Fire Marshal maps.⁸

3.13.1 Wildfire Impacts Resulting from the 2023 Modified Project

The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones; therefore, the project would not result in wildfire impacts.

⁷ See Public Resources Code section 5024.1. The State Historical Resources Commission oversees the administration of the CRHR and is a nine-member state review board that is appointed by the Governor, with responsibilities for the identification, registration, and preservation of California's cultural heritage. The CRHR "shall include historical resources determined by the commission, according adopted procedures, to be significant and to meet the criteria in subdivision (c) (Public Resources Code, Section 5024.1 (a)(b)).

⁸ Office of the State Fire Marshal. "Fire Hazard Severity Zones Maps." Accessed November 21, 2022. <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>

3.14 CONCLUSION

Based on the above analysis and discussion, no substantive revisions are needed to the IS/MND because no new significant impacts or impacts of substantially greater severity would result from the modified project. There have been no changes in circumstance in the project area that would result in new significant environmental impacts or substantially more severe impacts, and no new information has come to light that would indicate the potential for new significant impacts or substantially more severe impacts than were discussed in the IS/MND. Therefore, no further evaluation is required, and no subsequent EIR or subsequent negative declaration is needed pursuant to CEQA Guidelines Section 15162, and an IS/MND Addendum has therefore appropriately been prepared, pursuant to Section 15164.

Pursuant to CEQA Guidelines Section 15164(c), this Addendum need not be circulated for public review, but will be included in the public record file for the Los Altos High School Expansion IS/MND.

SECTION 4.0 REFERENCES

The analysis in this Addendum is based on the professional judgement and expertise of the environmental specialists preparing this document, based upon review of the site, surrounding conditions, site plans, and the following references:

Illingworth and Rodkin. Air Quality Memo. November 2022.

Mountain View/Los Altos Union High School District. Los Altos High School Expansion Initial Study. January 2019.

Mountain View/Los Altos Union High School District. Los Altos High School Expansion Initial Study Addendum. May 2019.

SECTION 5.0 LEAD AGENCY AND CONSULTANTS

5.1 LEAD AGENCY

Mountain View/Los Altos Union High School District
Mike Mathiesen, Associate Superintendent Business Services

5.2 CONSULTANTS

David J. Powers & Associates, Inc.
Environmental Consultants and Planners

Akoni Danielsen, President and Principal Project Manager
Desiree Dei Rossi, Project Manager

Illingworth and Rodkin
Air Quality Memo
Jay Witt, Senior Consultant
James Reyff, Principal

Appendix A - Air Quality Memo

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MEMO

Date: November 17, 2022

To: Désirée Dei Rossi
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From: Jay Witt
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RE: Los Altos High School Campus Expansion - Project Revision

SUBJECT: Update to Air Quality and GHG Analysis Job#18-149/150

This memo addresses changes to the air quality analysis prepared by Illingworth & Rodkin, Inc. in October 2018 for the construction of a new 33,310-sf two-story classroom building, a 4,657-sf one-story engineering laboratory and classroom building, a 32,200-sf student services building, and a 13,758-sf auxiliary gymnasium building on the existing Los Altos High School campus.¹ The 2018 air quality study predicted both construction and greenhouse gas (GHG) emissions associated with the project and health risks that the project may cause to nearby sensitive receptors. The analysis evaluated demolition of 39,400 sf of existing structures on the site and construction of 83,925 total new high school facilities. The air quality and GHG analysis found that emissions associated with the Project were potentially significant given the close proximity of residential sensitive receptors to the project site. The construction activities were considered to result in impacts in terms of excess cancer risk to any infants present or increased annual PM_{2.5} concentrations caused by construction equipment, traffic exhaust, and fugitive dust. These impacts could be reduced to less-than-significant levels with mitigation.

The Project has been modified and now proposes to demolish the 500 West Wing, which represents

¹ Illingworth & Rodkin, Inc. 2018. *Master Plan Modifications At Mountain View High School and Los Altos High School Air Quality Assessment* October.

an additional 1,823 square foot of demolition, and replace it with a 2,502-sf one-story building with two multi-use rooms and an athletic director's office. Thus, based on the size of the changes, demolition activities would increase by 5 percent and construction emissions would likely increase by 3 percent. These changes (Updated Project) are not anticipated to be substantially different than the previously studied project (Original Project) as overall construction activity in terms of demolition, earthwork, and building construction would be similar.

GHG emissions from the Updated Project are generally similar to that of the Original Project emissions. Differences are caused by the change in size of the Project, which would result in negligible increases in energy consumption, water use, and solid waste generation. Therefore, emissions under the Updated Project would not exceed the thresholds used to judge the significance of the GHG emissions. Both the Original Project and Updated Project would emit approximately 325 metric tons of GHGs when completed and slightly less (299 metric tons) in 2030, based on the emissions modeling completed in October of 2018.

In summary, the Updated Project is anticipated to have similar air quality impacts as the original Project that was evaluated in 2018. Updates to the construction modeling were not made because construction assumptions are not anticipated to significantly change (i.e., a change of greater than 25 percent). As a result, an increase in emissions and/or new impacts that require additional mitigation measures would not be anticipated given the changes. The project site acreage and building size are similar to those modeled for the Original Project. Both of the proposed mitigation measures would reduce impacts well below BAAQMD thresholds, providing allowances for the increases proposed under the Updated Project conditions. So even if construction increases under the Updated Project, impacts would be less than significant with Original Project mitigation.