CALIFORNIA ENVIRONMENTAL QUALITY ACT
STATEMENT OF FINDINGS

The Department of Toxic Substances Control (DTSC) has issued Findings for this project pursuant to the California Environmental Quality Act (CEQA; California Public Resources Code, Division 13, Section 21081) and implementing Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15091 et seq.)

A. PROJECT SUBJECT TO DTSC APPROVAL

PROJECT TITLE: Five Parcels Addressed as 435 San Antonio Road, 2535 California Street, and 350, 506, 510, and 520 Showers Drive, Mountain View, California, Removal Action Work Plan		SITE CODING: 204321
PROJECT ADDRESS: 435 San Antonio Road, 2535 California Street, 350, 506, 510-520 Showers Drive	CITY: Mountain View	COUNTY: Santa Clara
PROJECT SPONSOR: Los Altos School District	CONTACT: Erik Walukiewicz	PHONE/ EMAIL: (650) 947-1160 / ewalukiewicz@lasdschools.org
Approval Action Under Consideration by DTSC: Removal Action Work Plan		
STATUTORY AUTHORITY: ☐ California H&SC, Chap. 6.5 ☒ California H&SC, Chap. 6.8 ☐ Other (specify):		
PROJECT DESCRIPTION (List Specific Activities Proposed to be Undertaken): This Statement of Findings (SOF) addresses the potential environmental impacts associated with implementing the Five Parcels Removal Action Workplan (RAW Project) to address Naturally Occurring Asbestos (NOA) present in the underlying native soils located within five parcels (Site) at concentrations exceeding DTSC's school-site screening criterion. The five parcels are located at 435 San Antonio Road, 2535 California Street, and 350, 506, 510, and 520 Showers Drive, Mountain View, encompassing approximately 11.7 acres. The RAW Project activities consist of constructing permanent caps over NOA-containing soils using a combination of building foundations, asphalt pavement, concrete hardscape, synthetic turf, landscaping areas, and clean imported fill (Refer to Figure 1). A long-term Operations and Maintenance (O&M) agreement with DTSC will be established to maintain remedy protectiveness and govern future soil-disturbing activities at the Site. The proposed activities are anticipated to take several weeks. The cleanup activities will be completed as part of the Los Altos School District (LASD) project to redevelop the Site as a new elementary school in addition to a parcel of land conveyed to the City of Mountain View for a new public park. The LASD is the CEQA Lead Agency for the project and DTSC is a Responsible Agency under CEQA, acting in its role as the Lead Agency for the cleanup activities.		

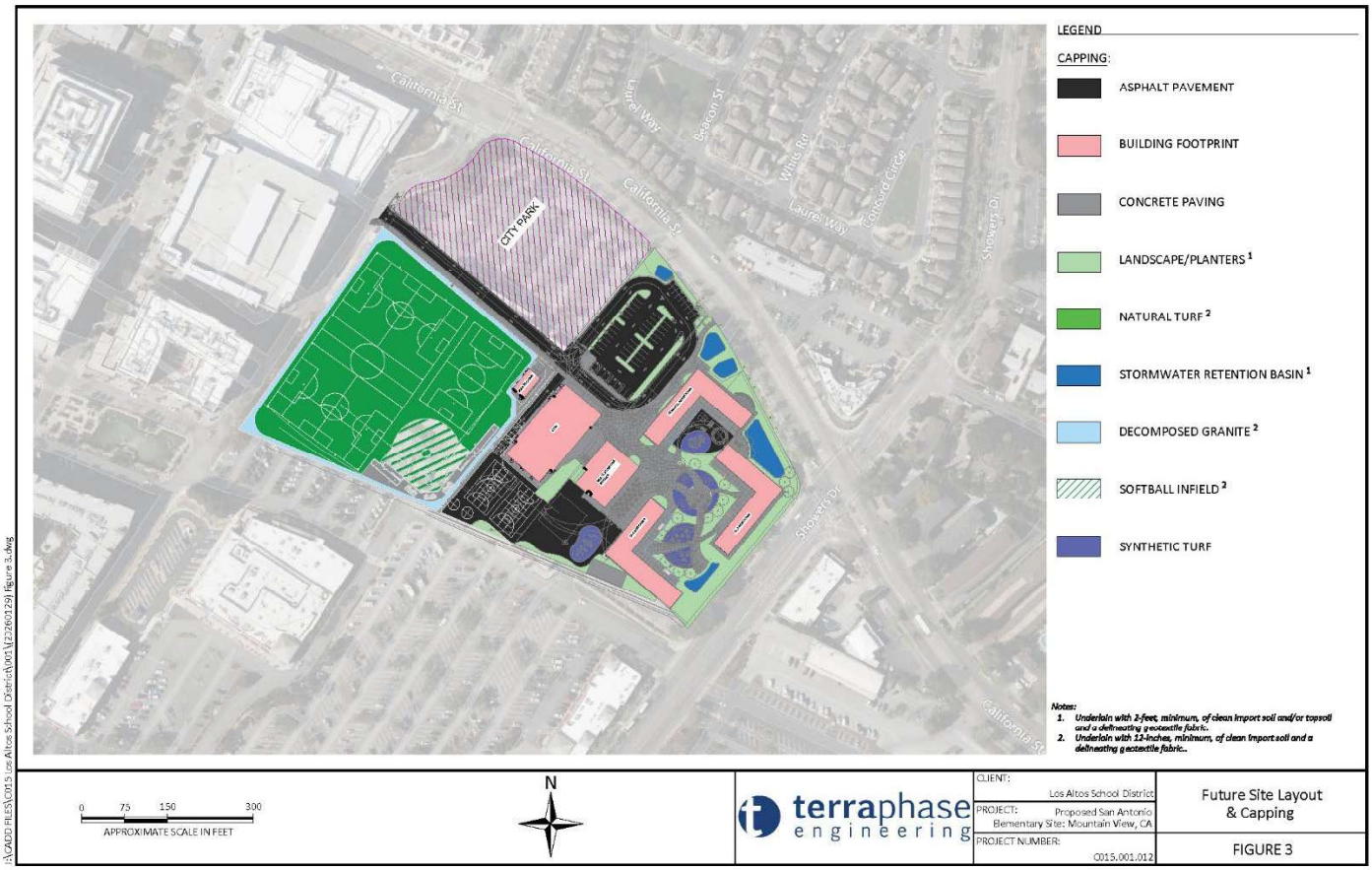


Figure 1– Future Site Layout & Capping
Source: Removal Action Workplan (RAW), Terraphase Engineering

Project activities in the RAW include:

- Constructing impervious improvements (concrete building foundations, concrete walkways, asphalt driveways and parking lots, and synthetic turf or other artificial surfaces in playgrounds) across the Site to prevent exposure to underlying NOA-containing soils.
- Constructing permeable improvements (bioretention basins, landscape/planter areas, natural turf, decomposed granite walkways, and softball infield fill) atop a minimum 12-inch final cap of clean imported fill.
- Installing a bright orange geotextile mesh between native soils and the final cap in permeable areas to alert future workers to the presence of underlying NOA-containing soils.
- Providing a minimum of 2 feet of clean fill and/or topsoil in landscape/planter areas and stormwater retention basins to allow for future landscaping work.
- Over-excavating utility trenches to 1 foot below design depth and backfilling with clean fill to facilitate future utility maintenance and/or repair; where excavation slopes leave NOA-containing native soil in place adjacent to permeable improvements, covering those surfaces with hardscape (e.g., rocks) to prevent contact.
- Preparing and implementing an Asbestos Dust Mitigation Plan (ADMP) in accordance with California Air Resources Board's Airborne Toxic Control Measure (CARB's ATCM) (17 CCR §93105) and an Air Monitoring and Dust Mitigation Plan (AMDMP) and submitting a Stormwater Pollution Prevention Plan (SWPPP) prior to soil-disturbing activities.
- Developing an O&M to ensure the remedy remains protective.

Los Altos School District 10th Site Community School Project Environmental Impact Report (EIR) (State Clearinghouse Number 2022070275)

The LASD's 10th Site Community School project includes the demolition of existing commercial buildings and redevelopment of the 11.7-acre site with a new two-story school planned to serve up to 900 students. School facilities will include classrooms, library, administration, and multi-purpose buildings, along with playfields, parking areas, and hardscape. At full buildout, new school buildings will total approximately 89,570 square feet, with a maximum building height of 38 feet. An area of up to 2.2 acres at the northwest corner of the site will be conveyed to the City of Mountain View for a future neighborhood park.

The LASD approved the EIR for the 10th Site School Project on June 24, 2024. The NOA-containing soils were identified in the EIR to be remediated and included in the analysis. The proposed remedy at the time was evaluated as a component of the school project throughout the EIR, being NOA soil export and clean import of 17,450 cubic yards.

Specifically, sections of the EIR detailing this analysis include:

- Section 3.2: Project Characteristics, 'Proposed Site Design, Demolition, and Construction' of the EIR, the document states:

  "Remedial action required to address naturally occurring asbestos (NOA) in soils would include capping of NOA-containing soil with clean imported fill, which may require over-excavation of NOA-containing soils in some areas. This would generate about 17,450 cubic yards of exported soil and 17,450 cubic yards of imported clean soil."

- Table 4.2-6 – 'Project Construction Assumptions for California Emissions Estimator Model (CalEEMod)' of Section 4.2 Air Quality for the Material Movement, states:

  "It was assumed that 17,450 cubic yards of soil impacted by naturally occurring asbestos would be excavated, hauled off-site, and then replaced with 17,450 cubic yards of imported clean soil. For demolition, it was assumed that 21,350 tons of demolition debris would be hauled off-site."

- Table 4.2-7 – '(Estimated Project Construction Emissions (Pounds Per Day)' identifies the Construction Emissions do not exceed the BAAQMD thresholds.

Subsequent to the approval of the EIR, the remedy was modified to capping of the NOA soils only and no excavation and offsite disposal. The selected remedy detailed in the RAW only includes the grading of NOA-impacted soil prior to being capped.

CEQA Compliance for Proposed Removal Action Workplan for the San Antonio Elementary School Site, Los Altos School District, City of Mountain View, California Technical Memorandum

The *CEQA Compliance for Proposed Removal Action Workplan for the San Antonio Elementary School Site, Los Altos School District, City of Mountain View, California Technical Memorandum*, (Terraphase, dated May 5, 2026) was prepared comparing the modified approach being the retaining and capping the 17,450 cy of NOA-containing soils on site rather than exporting the NOA- containing soil.

The certified EIR analyzed a worst-case scenario for managing the NOA at the Site, specifically evaluating the potential impacts of exporting 17,450 cubic yards (cy) of NOA-containing soils to an appropriate landfill, and importing clean fill. However, as the overall Project was revised, it was determined that the finished grade of the Site would need to be raised. Therefore, the LASD opted to manage the NOA-containing soils by burying and capping it on site with clean imported fill and other improvements, as described in the RAW.

The construction analysis in the Draft EIR relied on the CalEEMod modeling, including evaluation of the Project's impacts on air quality and greenhouse gas emissions in Sections 4.2, "Air Quality," and 4.7, "Greenhouse Gas Emissions" . This analysis accounts for emission sources related to exporting NOA-containing soils and importing clean soils as part of the overall Project construction. Based on the selected remedy identified in the RAW now no longer includes export of NOA-containing soils and instead involves burial and capping with imported clean fill, structures, hardscape, and landscaping, the Draft EIR analysis represents a conservative, worst-case scenario.

The modified approach reduces the overall environmental impacts related to air quality, greenhouse gas emissions, and landfill capacity. The modified approach now will require the operation of truck trips only on Site, reducing travel distances and thereby reducing the environmental impacts of the project activities. The environmental impacts from the project are within the scope and footprint of impacts analyzed in the EIR. Therefore, the certified EIR provided a conservative analysis, and no additional environmental review pursuant to CEQA is required for the selected remedy identified in the RAW.

Based on DTSC's independent review of LASD's 10th Site Community School Project EIR and the Technical Memorandum, this Statement of Findings was prepared concluding that the prior environmental document adequately analyzed impacts associated with the RAW. The RAW will be subject to compliance with all applicable mitigation measures identified in the EIR (See Section C below and Attachment 1). DTSC concurs with, and hereby adopts as its own, the findings made by LASD regarding potential impacts associated with implementation of the RAW. Therefore, for purposes of CEQA, no additional analysis beyond the prior analysis is required for implementation of the RAW.

B. LEAD AGENCY ENVIRONMENTAL DOCUMENT REVIEWED

Lead Agency: Los Altos School District
Lead Agency's Environmental Document: Los Altos School District 10th Site School Project – Environmental Impact Report
Date Adopted/Certified: June 24, 2024
State Clearinghouse Number: 2022070275

C. STATEMENT OF FINDINGS AND FACTS FOR ADEQUACY OF LEAD AGENCY ENVIRONMENTAL DOCUMENT

Using its independent judgment, DTSC makes the following findings:

☒ The Lead Agency Final Environmental Document includes a description of the Project now before DTSC for decision

☒ The Lead Agency Final Environmental Document adequately analyzed impacts associated with the Project before DTSC for decision.

☒ DTSC concurs with the findings made by the Lead Agency Final Environmental Document relating to the Project before DTSC for decision.

☒ Mitigation measures are included in the Lead Agency Final Environmental Document for the following resources that would potentially be affected by the DTSC project.

☒ Aesthetics	Mitigation Measure: See Attachment 1
☐ Agricultural Resources	Mitigation Measure: None
☒ Air Quality	Mitigation Measure: See Attachment 1
☒ Biological Resources	Mitigation Measure: See Attachment 1
☒ Cultural Resources	Mitigation Measure: See Attachment 1
☐ Energy	Mitigation Measure: None
☒ Geology / Soils	Mitigation Measure: See Attachment 1
☐ Greenhouse Gas Emissions	Mitigation Measure: None
☐ Hazards / Hazardous Materials	Mitigation Measures: None
☒ Hydrology / Water Quality	Mitigation Measure: See Attachment 1
☐ Land Use / Planning	Mitigation Measure: None
☐ Mineral Resources	Mitigation Measure: None
☐ Noise	Mitigation Measure: None
☐ Population / Housing	Mitigation Measure: None
☐ Public Services	Mitigation Measure: None
☐ Recreation	Mitigation Measure: None
☐ Transportation / Traffic	Mitigation Measure: None
☒ Tribal Cultural Resources	Mitigation Measure: See Attachment 1
☐ Utilities / Service Systems	Mitigation Measure: None
☐ Wildfire	Mitigation Measure: None

☒ Mitigation measures identified in the Lead Agency Final Environmental Document have been adopted by DTSC for this Project and will be implemented to avoid, reduce, or substantially lessen the project impacts. No additional mitigation measures are necessary, and no additional mitigation monitoring plan is required pursuant to CEQA.

For each significant environmental effect identified for the Project:

☒ Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the Lead Agency Final Environmental Document.

☒ Such changes or alterations are within the responsibility and jurisdiction of the Los Altos School District not DTSC.

☒ Such changes have been adopted by this public agency or can and should be adopted by this public agency.

☐ Mitigation measures included in the Lead Agency Final Environmental Document are infeasible, and therefore, will not be incorporated into the DTSC Project for the following reasons: N/A

BASED ON THE ABOVE FINDINGS, DTSC CONCLUDES:

☒ The proposed Project will not result in significant and unavoidable effects to the environment.

☐ The proposed Project will result in significant and unavoidable effects to the following environmental resources:

☐ Air Quality
☐ Agricultural Resources
☐ Biological Resources
☐ Cultural Resources
☐ Energy
☐ Geology/ Soils
☐ Greenhouse Gas Emissions
☐ Hazards/Hazardous Materials
☐ Hydrology/ Water Quality
☐ Mineral Resources
☐ Noise
☐ Population/Housing
☐ Public Services
☐ Recreation
☐ Transportation/Traffic
☐ Tribal Cultural Resources
☐ Utilities/ Service Systems
☐ Wildfire

Impacts to these resources would remain significant even after applying mitigation measures described in the Lead Agency Final Environmental Document, or there is no feasible mitigation available.

In accordance with Cal. Code of Regs., title 14, section 15093, a Statement of Overriding Considerations was adopted by the Lead Agency for these resources. DTSC adopts a Statement of Overriding Considerations for these resources having determined that the DTSC Project benefits outweigh the significant environmental effects for the following reasons: The DTSC remedial actions reduce the exposure of contaminated soil, soil gas, and groundwater in order to render it safe for Site occupants. The DTSC remedial project also serves to protect human health and the environment, which are DTSC's responsibilities under the California Health and Safety Code.

☒ None of the conditions requiring a subsequent EIR or Negative Declaration pursuant to Cal. Code Regs., tit. 14 Section 15162 exist.

☒ In accordance with Cal. Code of Regs., title 14, section 15093, a Notice of Determination indicating the results of said Findings will be filed with the Governor's Office of Planning and Research / State Clearinghouse.

D. CERTIFICATION

E. Tisdale

11/4/2026

Project Manager's Signature | Date

Elizabeth Tisdale	Engineering Geologist	(916) 255-6666
Project Manager's Name	Title	Phone #

Nov 13, 2026

Branch Chief's Signature | Date

Angela Singh	Environmental Program Manager I	(916) 255-6580
Branch Chief's Name	Title	Phone #

ATTACHMENT 1
Los Altos School District 10th Site School Project
Mitigation Measures

Mitigation measures identified in the Lead Agency Final Environmental Document have been adopted by DTSC for this Project and will be implemented to avoid, reduce, or substantially lessen the project impacts. No additional mitigation measures are necessary, and no additional mitigation monitoring plan is required pursuant to CEQA.

4.1- Aesthetics:

Impact AESTHETICS-1: The project could result in additional light and glare for nearby residential development due to lighting of the sports field at the west edge of the site.

MM AESTHETICS -1: The following measures shall be implemented to minimize light and glare for nearby residences:

a) All outdoor lighting shall be shielded and directed downward to minimize both sky-light and spill light, in accordance with California Code of Regulations (CCR) Title 24 outdoor lighting requirements. Lighting shall be controlled by photocontrols or time switches.

b) Using the Illuminating Engineering Society of North America (IESNA) criteria, it is recommended that average illuminance in footcandles (fc) be the following: baseball/softball field, 30 fc; soccer field, 30 fc; and practice field, 20 fc.

c) Glare shall be limited to a maximum of 9,000 to 10,000 candelas (cd), at 6 feet elevation, at the property line. Field testing using a meter for measurement of glare is not generally practical due to the unavailability of trained technicians and instruments.

d) To ensure that the maximum trespass/spill light on residences at the identified locations remains at or below 1.0 fc, field testing shall take place for the actual performance of the system prior to site occupancy.

e) Any need to re-aim and/or adjust the luminaires during the initial nighttime testing of the field lights shall be assessed and completed prior to site occupancy. This would ensure that no excessive trespass/spill light remains uncorrected.

f) The proposed field lights shall be provided with programmable controls to turn OFF the lights at a pre-set time recommended by the City of Mountain View and agreed to by the Los Altos School District (LASD). Manual controls shall only be provided for testing the lights.

g) Additional control features that can be considered are dimming controls that would allow operation of the field illumination to be reduced for practice play when there are no spectators present, as well as for after-game clean-up work. These features have the benefit of allowing some degree of illumination after the prescribed time for when lights must be turned off immediately after a game. The combination of the above mitigation measures would reduce this potential impact to less than significant.

4.2- Air Quality:

Impact AIR-1: Soil disturbance during project construction would generate fugitive dust coarse particulate matter (PM10) and fine particulate matter (PM2.5) emissions that could result in a cumulatively considerable net increase in criteria air pollutants for which the region is in nonattainment.

MM AIR-1: During project construction, the contractor shall implement a dust control program that includes the following measures recommended by the Bay Area Air Quality Management District (BAAQMD):

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- 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.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
- 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.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by California Airborne Toxic Control Measure Title 13, Section 2485 of California Code of Regulations [CCR]).
- Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications.

- All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- A publicly visible sign shall be posted with the telephone number and person to contact at the Lead Agency (the Los Altos School District) regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

4.3- Biological Resources

Impact BIO-1: Development of the proposed school may result in adverse impacts on nesting birds, if present on the project site. Thus, the project could have a substantial adverse effect on species identified as a candidate, sensitive, or special-status species, and interfere substantially with wildlife nursery sites.

MM BIO-1: Adequate measures shall be taken to avoid inadvertent take of raptor nests and other nesting birds protected under the Migratory Bird Treaty Act when nests are in active use. This shall be accomplished by taking the following steps:

- If construction is proposed during the nesting season (February through August), a focused survey for nesting raptors and other migratory birds shall be conducted by a qualified biologist within 14 days prior to the onset of vegetation removal or construction in order to identify any active nests on the project site and in the vicinity of proposed construction.
- If no active nests are identified during the survey period, or if development is initiated during the non-breeding season (September through January), construction may proceed with no restrictions.
- If bird nests are found, an adequate setback shall be established around the nest location and construction activities restricted within this no-disturbance zone until the qualified biologist has confirmed that any young birds have fledged and are able to function outside the nest location. Required setback distances for the no-disturbance zone shall be based on input received from the California Department of Fish and Wildlife (CDFW) and may vary depending on species and sensitivity to disturbance. As necessary, the no-disturbance zone shall be fenced with temporary orange construction fencing if construction is to be initiated on the remainder of the development site.
- A report of findings shall be prepared by the qualified biologist and submitted to the Los Altos School District (LASD) for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season (February through August). The report either shall confirm absence of any active nests or shall confirm that any young within a designated no-disturbance zone have fledged and construction can proceed.

The combination of the above measures would reduce this potential impact to less than significant.

4.4- Cultural Resources

Impact CULT-1: The project could cause a substantial adverse change in the significance of an archaeological resource pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15064.5.

MM CULT -1: The following measures shall be implemented:

a) During the first construction tailgate safety meeting, the project construction site superintendent shall remind all project personnel that they are legally required to stop work and notify their supervisor if they believe that they have unearthed archaeological artifacts. The construction superintendent shall similarly instruct all new construction personnel who arrive on the project site after the initial tailgate safety meeting.

b) If evidence of any subsurface archaeological features or deposits is discovered during construction-related earth-moving activities (e.g., lithic scatters, midden soils, historic era farming or construction materials), all ground-disturbing activity in the area of the discovery shall be halted within 25 feet of the find until a qualified archaeologist and Native American representative from a traditionally and culturally affiliated tribe, as appropriate, can assess the significance of the find and make recommendations for further evaluation and treatment as necessary. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, and/or returning objects to a location within the project area where they will not be subject to future impacts.

c) If, after evaluation, a resource is considered significant, or is considered a tribal cultural resource, all preservation options shall be considered as required by the California Environmental Quality Act (CEQA) (see Public Resources Code Section 21084.3), including possible capping, data recovery, mapping, or avoidance of the resource. Treatment that preserves or restores the cultural character and integrity of a tribal cultural resource may include tribal monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. If artifacts are recovered

from significant prehistoric archaeological resources or tribal cultural resources, the first option shall be to transfer the artifacts to an appropriate tribal representative. If possible, accommodations shall be made to re-inter the artifacts at the project site. Only if no other options are available will recovered Native American archaeological material be housed at a qualified curation facility. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, analyzes and interprets the results, and distributes this information to the public.

The combination of the above measures would reduce this impact to less than significant.

Impact CULT-2: The project could disturb human remains, including those interred outside of formal cemeteries.

MM CULT -2: Construction work shall immediately be halted if human remains are discovered, and applicable Provisions of the California Health and Safety Code Section 7050.5 shall be implemented. If human remains are discovered during project construction activities, the requirements of California Health and Safety Code Section 7050.5 shall be followed. Potentially damaging excavation shall halt on the project site within a minimum radius of 100 feet of the remains, and the county coroner shall be notified. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (California Health and Safety Code Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (California Health and Safety Code Section 7050[c]). Pursuant to the provisions of Public Resources Code Section 5097.98, the NAHC shall identify a Most Likely Descendent (MLD). The MLD designated by NAHC shall have at least 48 hours to inspect the site and propose treatment and disposition of the remains and any associated grave goods. The Los Altos School District (LASD) shall work with the MLD to ensure that the remains are removed to a protected location and treated with dignity and respect. Native American human remains may also be determined to be tribal cultural resources. The county coroner shall contend with the human remains if they are not of Native American origin. Adherence to these procedures and provisions of the California Health and Safety Code would reduce potential impacts on human remains less than significant.

4.6- Geology and Soils

Impact GEO-1: The project could directly or indirectly destroy a unique paleontological resource or site.

MM GEO-1: Before the start of any excavation activities, the Los Altos School District (LASD) shall retain a qualified paleontologist, as defined by the Society of Vertebrate Paleontology (SVP), who is experienced in training construction personnel regarding paleontological resources. The qualified paleontologist shall train all construction personnel who are involved with earthmoving activities, including the site superintendent, regarding the possibility of encountering fossils, the appearance and types of fossils that could be seen during construction, and proper notification procedures should fossils be encountered. Should any paleontological resources be encountered during construction activities, all ground-disturbing activities within 50 feet of the find shall be ceased and LASD shall be notified immediately. LASD shall immediately notify the qualified paleontologist and request that they assess the situation based on SVP standards, consult with agencies as appropriate, and make recommendations for the treatment of the discovery if found to be significant. If construction activities cannot avoid a significant paleontological resource, the qualified paleontologist shall salvage the paleontological resource and recommend additional measures (as needed) to minimize adverse effects on paleontological resources. Additional measures may include on-site monitoring by the qualified paleontologist of future excavation activities; identification, cataloging, curation, and provision for repository storage of prepared fossil specimens; preparation of a technical report on the finds and their significance; and provision of the salvaged fossil material and technical report to a paleontological repository, such as the University of California Museum of Paleontology. Public educational outreach may also be appropriate. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to LASD for review. The above measures shall be included in contract specifications.

4.9- Hydrology and Water Quality

Impact HYDRO-1: Stormwater runoff from the future park site during the period following construction of the school campus and prior to construction of the park could contribute to the degradation of water quality.

MM HYDRO-1: The temporary stormwater drainage system that would be installed inside the edge of the future park site to capture runoff from the park site shall include a temporary stormwater treatment system such as a bio-retention treatment area to ensure that runoff from the future park site would not degrade water quality prior to construction of the

future park. The Los Altos School District (LASD) shall be responsible for the inspection and maintenance of this temporary stormwater treatment system until the future park site is conveyed to the City of Mountain View by LASD, at which time inspection and maintenance of this temporary stormwater treatment system shall become the responsibility of the City. The design and maintenance of the temporary stormwater drainage system shall be included in the stormwater management plan to be submitted to the City for review and approval prior to the City issuing the permits that would allow proposed stormwater drainage systems to connect to the City's existing stormwater drainage system.

Impact HYDRO-2: Removal of existing on-site storm drain systems that capture and convey runoff from off-site areas could result in localized flooding on the project site and southern adjacent areas if new off-site storm drain systems are not yet installed.

MM HYDRO-2: The Los Altos School District (LASD) shall coordinate with the owner of the property adjacent to the south of the project site regarding the design and timing for construction of the project and the new off-site storm drain system improvements to ensure that the new off-site storm drain system would be installed prior to the removal of the existing storm drains on the project site that capture runoff from off-site areas. If the installation of new off-site storm drain systems would not be completed prior to the removal of the existing storm drains on the project site that capture runoff from the off-site area south of the project, the project shall incorporate additional storm water capture and treatment systems along its southern boundary into the project design and construction in order to manage stormwater runoff from this off-site area.

4.15- Tribal Cultural Resources

Impact TRIBAL-1: The project could cause a substantial adverse change in the significance of as-yet unknown tribal cultural resources.

MM TRIBAL-1: The Los Altos School District (LASD) shall implement Mitigation Measures CULT-1 and CULT-2.