

MEMORANDUM

DATE: March 26, 2024
TO: Michael Lisbennee, David J. Powers and Assoc.
FROM: Robin J. Lee, PE
Sarah Weinberg, EIT
SUBJECT: Halsey House CEQA Hydrology

Approach to Analysis

This impact evaluation for the Halsey House (Site) in the City of Los Altos identifies potential hydrologic and water quality impacts of the proposed development. The project would comply with City standard conditions or include measures in the design that would lead to less than significant impacts.

Thresholds of Significance

Appendix G of the CEQA Guidelines and the Regulatory Setting requirements considers the proposed project to have a significant environmental impact with regard to hydrology if it would:

- Impact 1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;
- Impact 2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- Impact 3: Substantially alter the existing drainage pattern of the Site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
- Impact 4: Result in a substantial erosion or siltation on- or off-site;
- Impact 5: Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
- Impact 6: Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- Impact 7: Impede or redirect flood flows;
- Impact 8: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or
- Impact 9: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Project Location

The Site's structure is part of the Redwood Grove in the City of Los Altos. The structure is located partially in the floodway and floodplain of Adobe Creek per the effective FEMA mapping. The Site is bound by forested park area to the north, south, west, and single-family residences to the east.

University Avenue is located east of the Site. Manresa Way is located south of the Site. Lennox Way is located west of the Site. Regional and aerial maps of the project Site are shown in Figure 1 and Figure 2, respectively.

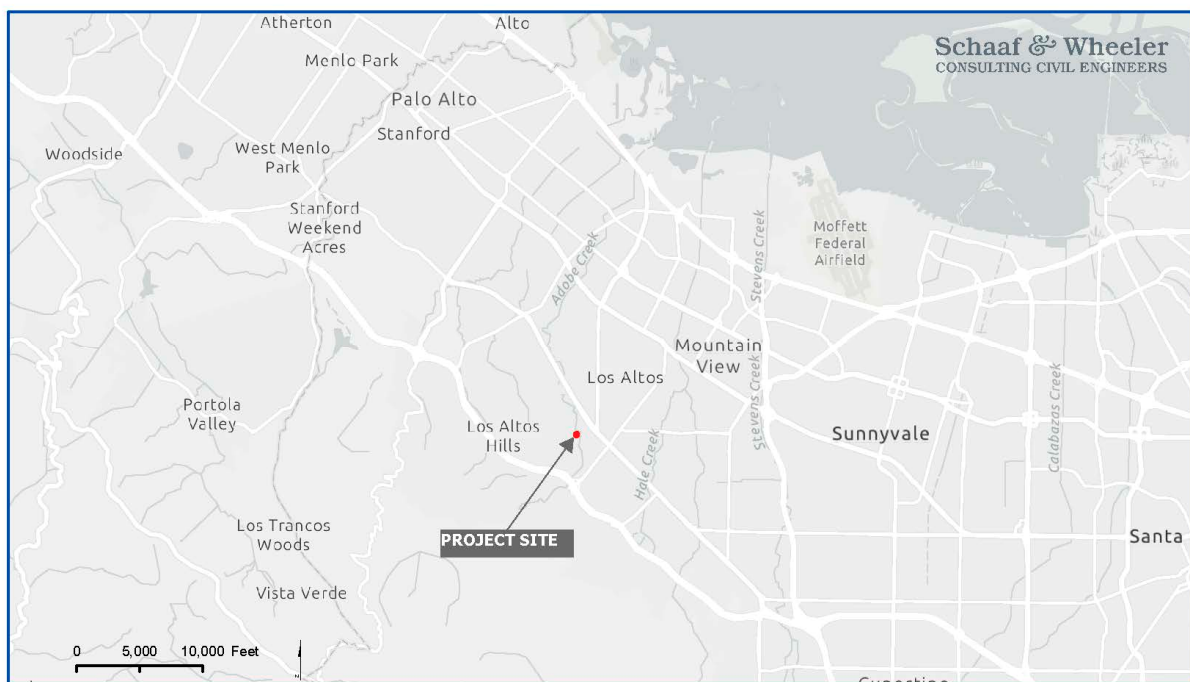


Figure 1. Regional Map of Project Site

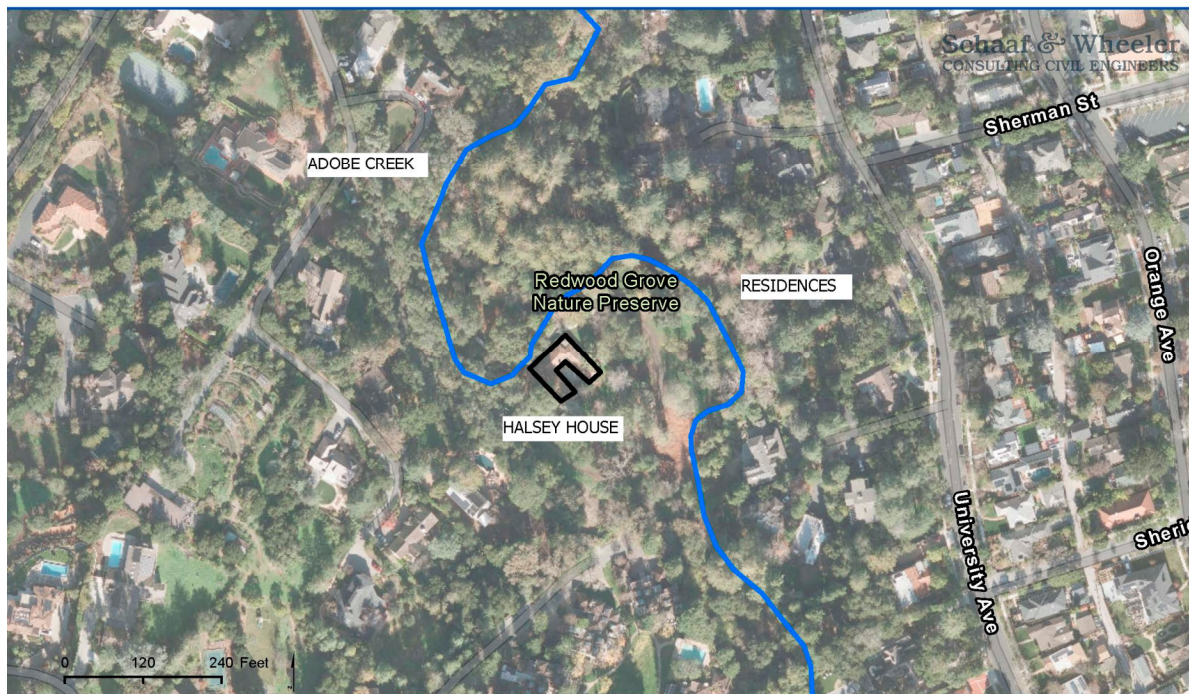


Figure 2. Vicinity Map of Project Site

Project Description

The proposed project would remove the existing structure from Redwood Grove Nature Preserve. This public park is approximately 6.12 acres and contains picnic tables and trails along Adobe Creek. There is also programming that takes place throughout the year, such as a summer camp and daycare.

FEMA Mapping

The Site is on the effective FIRM panel 06085C0201H dated May 18, 2009. The effective FIRM map shows the Site within the Regulatory Floodway and a Special Flood Hazard Area (SFHA) for the 100-year floodplain (Zone AE) of Adobe Creek. A Regulatory Floodway is the area reserved for watercourse and the adjacent land that must be reserved in order to discharge the base flood without cumulatively increasing water surface elevation more than a certain height. Zone AE has a defined base flood elevation. The current FEMA mapping and the location of the Site can be seen in Figure 3.

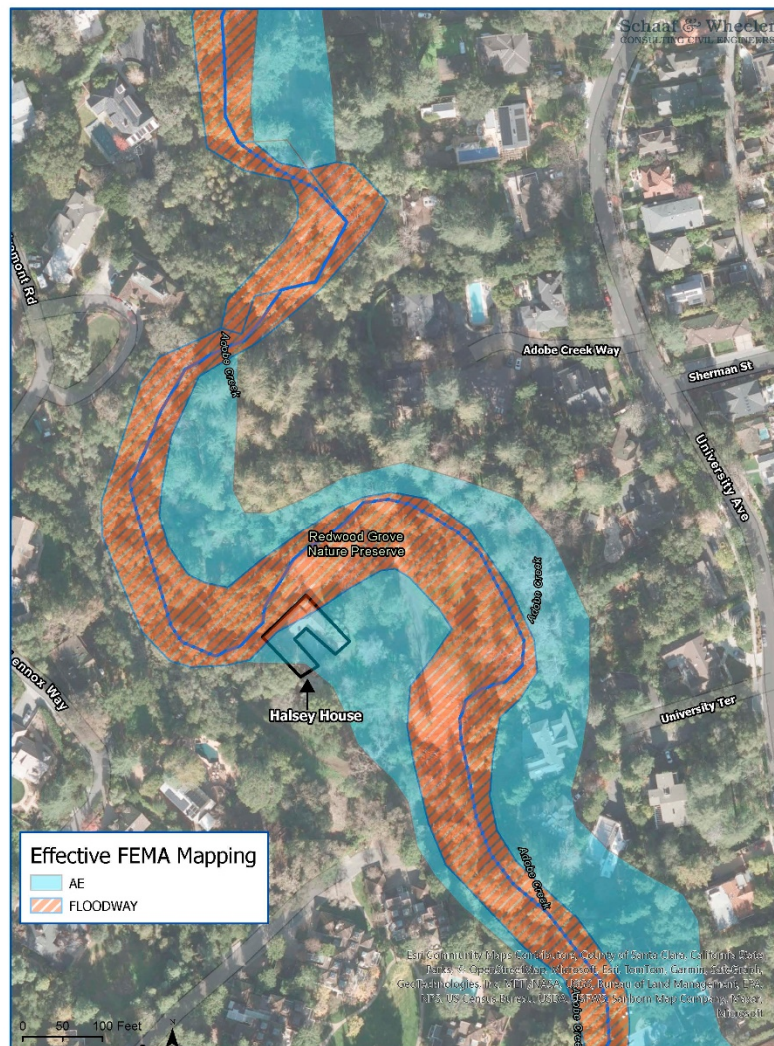


Figure 3. Flood Hazard Zones on Project Site

Schaaf & Wheeler did a desktop analysis on the Site and noticed that the alignment of the creek appears differently on the 2020 LIDAR dataset as compared with the FEMA mapping. Schaaf & Wheeler performed a Site visit in January 2024 and determined that the Site should not be in the Regulatory Floodway. GPS points from the Site visit, and the 2020 Santa Clara County LiDAR confirm that the current FEMA map does not accurately show the path of Adobe Creek near the Site. Figure 4 summarizes these findings.

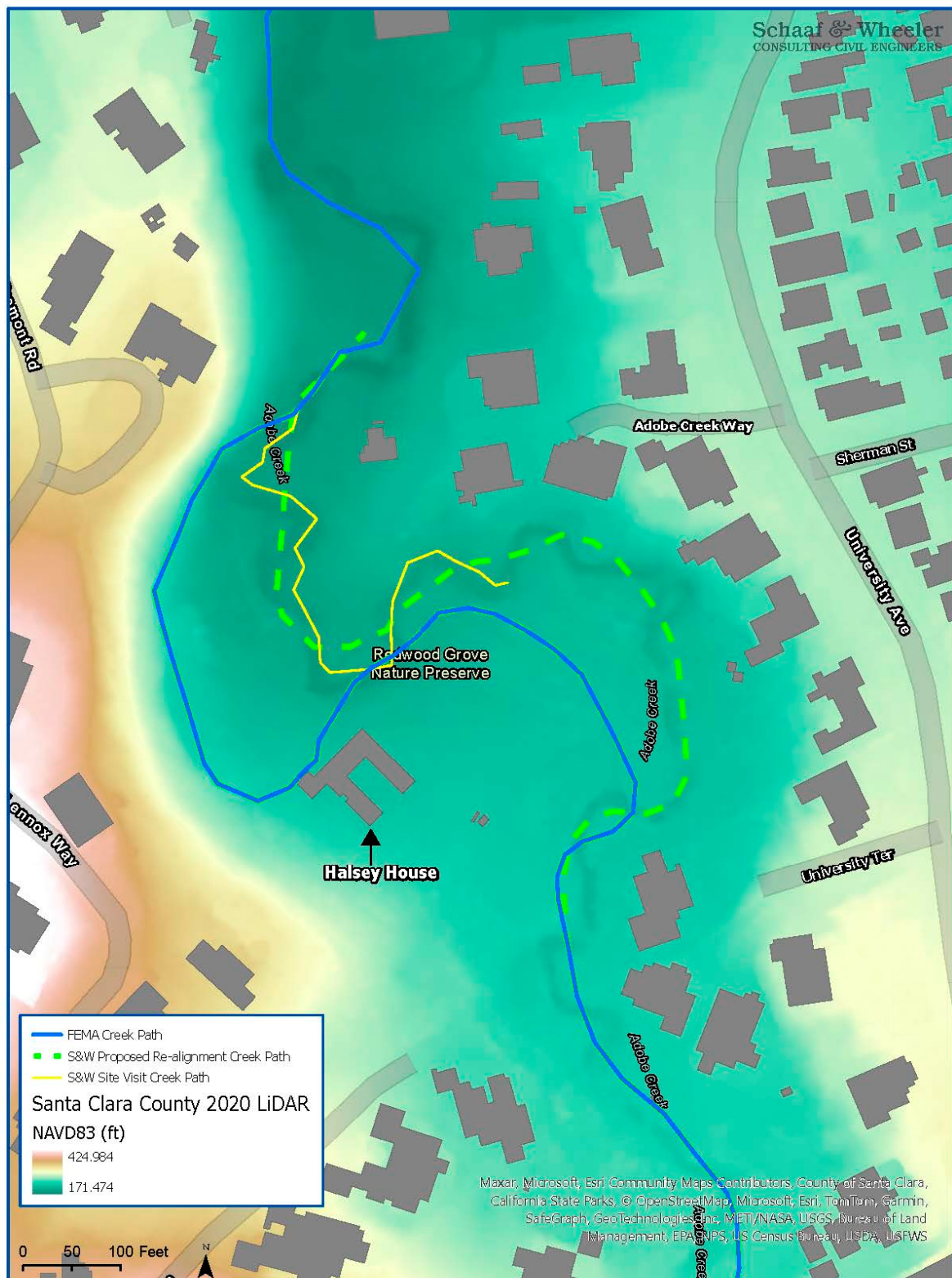


Figure 4. Site Investigation and LiDAR Creek Path

Figure 5 shows what Schaaf & Wheeler believes should be the correct FEMA mapping. The following summary of impacts assumes that the Site should not be in the floodway. While this assumption holds true for the demolition of the building, the City may want to consider a LOMR to revise the FEMA effective map if the building is to be rebuilt in the existing location.

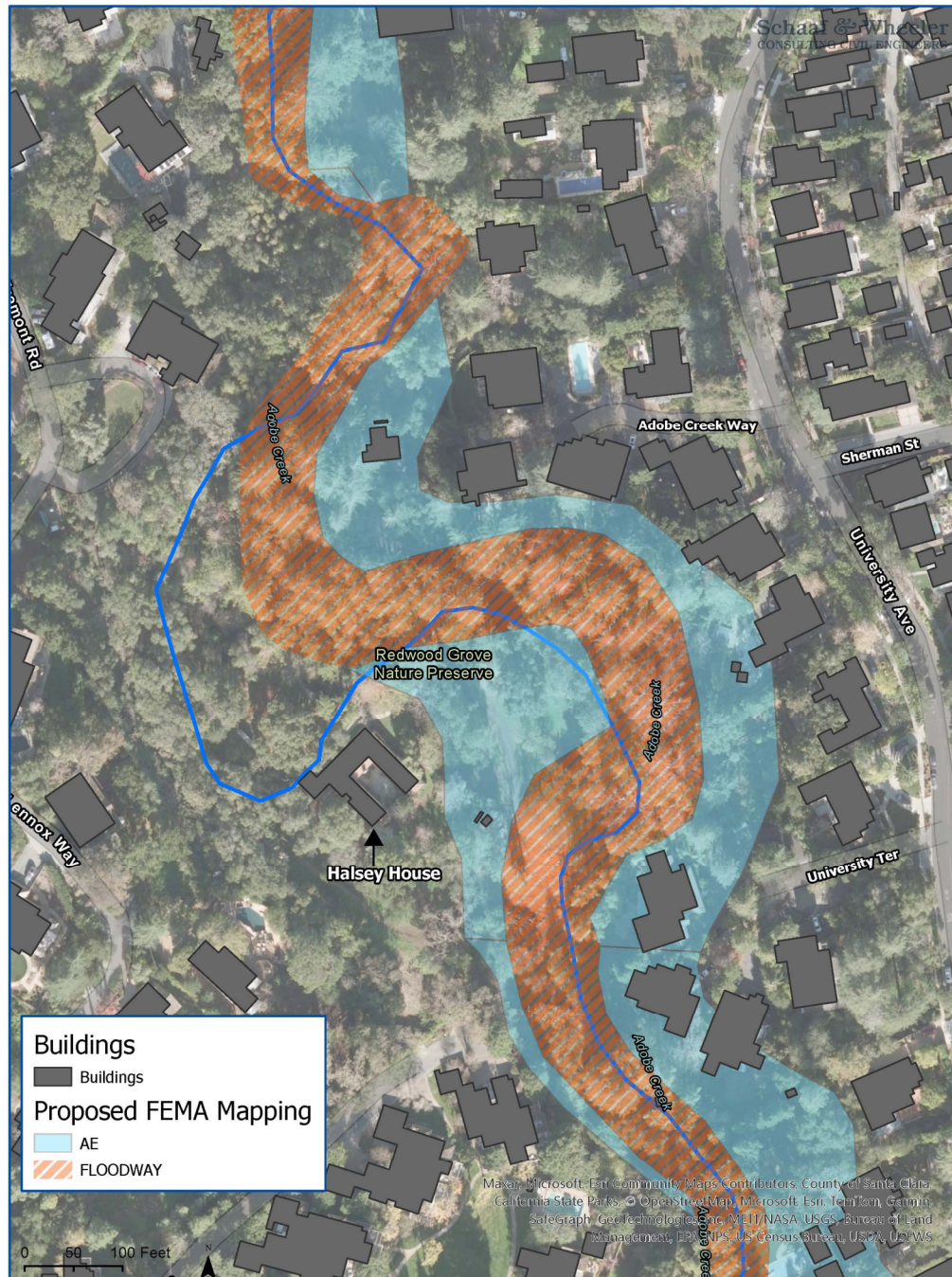


Figure 5. Proposed FEMA Re-Mapping

Project Impacts and Mitigation Measures

Impact 1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality

Finding: Less than significant

The City of Los Altos is located in Regional Water Quality Control Board Region 2 (San Francisco Bay Region). All requirements for the Demolition of an Existing Structure as specified by the Santa Clara County must be followed. Since the project is less than an acre, it is exempt from filing with the State Water Resources Control Board and the Statewide General NPDES Permit for Storm Water Discharges Associated with Construction Activity.

The project has a ***less than significant impact*** by complying with the Santa Clara County demolition requirements.

Impact 2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin

Finding: Not studied under this memo

This section is not analyzed further for the reasons given since groundwater impacts are being studied by others.

Impact 3: Substantially alter the existing drainage pattern of the Site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces

Finding: Less than significant

In the current condition, runoff generally flows from the west side of the Site to the north and east side of the Site and into Adobe Creek. The proposed project is to demolish the structure, which will decrease the impervious surface. Since Schaaf & Wheeler has determined the Site is not in the floodway, no conveyance will be affected. Since the addition of pervious surface by removing the building will decrease runoff generated, the alter of the existing drainage pattern is ***less than a significant level***.

Impact 4: Result in a substantial erosion or siltation on or off Site of the plan area

Finding: Less than Significant

The City is unaware of any flooding or mudslides at the current Site.

During demolition, a Stormwater Pollution Prevention Plan (SWPPP) and a Stormwater Management Plan (SWMP) will be prepared to avoid on-site erosion.

Therefore, since the risk of increased erosion is negligible the project would have a ***less than significant level*** as a result of the project.

Impact 5: Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site of the plan area**Finding: Less than significant**

Since the demolition of the Site will increase the pervious area, the rate of surface runoff will be decreased. Flooding to Adobe Creek is expected to be a ***less than significant level***.

Impact 6: Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff**Finding: Less than significant**

Since the Site runoff is expected to decrease due to the removal of impervious surface, the project has a ***less than significant impact***.

Impact 7: Alter existing drainage patterns, including streams and rivers, that impede or redirect flood flows**Finding: Less than significant**

The project Site is located within the Regulatory Floodway and a SFHA. Since Schaaf & Wheeler believes that the Site should not be in the Floodway, no conveyance will be altered by the removal of the Site. Therefore, the project would be considered to have a ***less than significant impact***.

Impact 8: In flood hazard, tsunami or seiche zones, risk release of pollutants due to project inundation**Finding: Less than significant**

The project removes the structure from the Site, so the risk of pollutant release due to project inundation is not a concern. In addition, the Site is located significantly far enough away from any tsunami or seiche zones.

Therefore, the project would have a ***less than significant*** impact with regards to inundation by seiche or tsunami.

Impact 9: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan**Finding: Less than significant**

During demolition of the project, short term impacts to water quality can occur when soils are disturbed, making it susceptible to water erosion and sedimentation. Other pollutants found during demolition are petroleum products (gasoline, diesel, kerosene, oil, and grease), hydrocarbons from asphalt paving, paints, and solvents, detergents, nutrients (fertilizers), pesticides (insecticides, fungicides, herbicides, rodenticides), and trash.

Potential demolition pollutant impacts can be mitigated through preparation and implementation of an erosion control plan and a SWPPP consistent with recommended design criteria. The erosion control plan in the SWPPP would include components for erosion control, such as phasing of grading, limiting areas of disturbance, designation of restricted-entry zones, diversion of runoff away from disturbed areas, protective measures for sensitive areas, outlet protection, and provision for re-vegetation or mulching.

The project would have a ***less than significant impact*** to control water quality of surface runoff.