



CITY COUNCIL SPECIAL MEETING AGENDA

June 23, 2026 - 5:00 PM
In Person

Members of the public may participate by being present at the Los Altos Council Chamber at Los Altos City Hall located at 1 N. San Antonio Rd, Los Altos, CA during the meeting. Public comment is accepted in person at the physical meeting location, or via email to PublicComment@losaltosca.gov.

RULES FOR CONDUCT: Pursuant to Los Altos Municipal Code, Section 2.05.010 "Interruptions and rules for conduct": Understanding that the purpose of the city council meetings is to conduct the people's business for the benefit of all the people, in the event that any meeting of the city council is willfully interrupted by a person or group of persons so as to render the orderly conduct of the meeting impossible, the mayor, mayor pro-tem, or any other member of the city council acting as the chair may order the removal of the person or persons responsible for the disruption and bar them from further attendance at the council meeting, or otherwise proceed pursuant to Government Code Section 54957.0 or any applicable penal statute or city ordinance.

REMOTE MEETING OBSERVATION: Members of the public may view the meeting via the link below, but will not be permitted to provide public comment via Zoom or telephone. Public comments will be accepted in person, and members of the public may submit written comments by following the instructions below.

<https://losaltosca.gov.zoom.us/j/99500114824?pwd=jMgxOG4mx6S6nub4hmkaTlxqBvpkji.1>

Telephone: 1-669-444-9171 / Webinar ID: 995 0011 4824 / Passcode: 327692

SUBMIT WRITTEN COMMENTS: Prior to the meeting, comments on matters listed on the agenda may be emailed to PublicComment@losaltosca.gov. Emails sent to this email address are sent to/received immediately by the City Council. Emails sent directly to the City Council as a whole or individually, and not sent to PublicComment@losaltosca.gov will not be included as a public comment in the Council packet.

Please note: Personal information, such as e-mail addresses, telephone numbers, home addresses, and other contact information are not required to be included with your comments. If this information is included in your written comments, they will become part of the public record. Redactions and/or edits will not be made to public comments, and the comments will be posted as they are submitted. Please do not include any information in your communication that you do not want to be made public. The Mayor will open public comment and will announce the length of time provided for comments during each item.

AGENDA

CALL MEETING TO ORDER

ESTABLISH QUORUM

STUDY SESSION

1. **Halsey House Project Draft Environmental Impact Report (EIR) Study Session**
Direct staff to work with David J. Powers & Associates, Inc. (Consultant) to prepare Final EIR (FEIR). If the FEIR is certified and the project is approved, the City shall file a Notice of

Determination

ADJOURNMENT

SPECIAL NOTICES TO THE PUBLIC

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



City Council Staff Report

Meeting Date: June 23, 2026
Prepared By: Harun Musaefendic
Approved By: Gabe Engeland

Subject: Halsey House Project Draft Environmental Impact Report (EIR) Study Session

COUNCIL PRIORITY AREA

General Government

RECOMMENDATION

Direct staff to work with David J. Powers & Associates, Inc. (Consultant) to prepare Final EIR (FEIR). If the FEIR is certified and the project is approved, the City shall file a Notice of Determination

ENVIRONMENTAL IMPACT

The City Council's action in holding a study session and providing staff direction is statutorily exempt from review under California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15262 (Feasibility and Planning Studies), in that any direction from Council will be tentative pending further analysis by City officials and final action by the City Council.

FISCAL IMPACT

Future fiscal impact associated with the Halsey House project will be determined by the treatment method for the existing structure and future use.

PREVIOUS COUNCIL CONSIDERATION

May 9, 2023; April 25, 2023; November 30, 2021; September 21, 2021; May 25, 2021; March 23, 2021; January 12, 2021; December 15, 2020; January 28, 2018; November 15, 2016; June 14, 2016; December 8, 2015; April 23, 2013.

BACKGROUND

Funding for the Halsey House CEQA Analysis was appropriated at the Council Meeting held on May 9, 2023. Authorizing the City Manager to execute an agreement not to exceed \$200,000 with an environmental consultant to perform the CEQA analysis was granted at the same Council Meeting. On October 13, 2023, City of Los Altos entered into a professional services agreement with the Consultant for the preparation of an Environmental Impact Report (EIR) for Halsey House. Environmental Impact Report is an information document that assesses potential environmental impacts of a proposed project, as well as identifies mitigation measures and alternatives to the proposed project that could reduce or avoid adverse environmental impacts.

ANALYSIS

Consultant and City Staff have worked on the CEQA analysis since the agreement was executed

in October 2023. Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) was circulated on February 12, 2025, with a review period of thirty (30) days concluding on March 14, 2025. Consultant and City Staff gathered comments during the NOP circulation period and have included them in the Draft EIR. Draft EIR was circulated on June 11, 2026, with a review period of forty-five (45) days concluding on July 27, 2026. Consultant and City Staff will gather comments during the Draft EIR circulation period and will include them in the Final Environmental Impact Report.

DISCUSSION

The proposed project evaluated in the Draft EIR is the demolition of the Halsey House and restoration of the site with native landscaping. The Draft EIR summarizes significant environmental impacts, and the mitigation measures proposed to avoid or reduce those impacts. The Draft EIR also identifies five (5) alternatives to the proposed project that could reduce or avoid adverse environmental impacts. The five alternatives are:

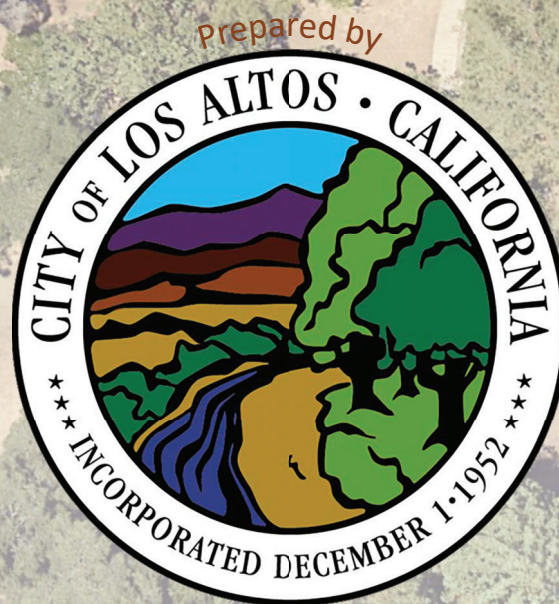
No Project Alternative (retain the existing Halsey House as-is),
Preservation Alternative 1 – Relocation of Historic Resource Off-Site,
Preservation Alternative 2 – Full Rehabilitation of Historic Resource,
Preservation Alternative 3 – Partial Rehabilitation/Partial Demolition,
Preservation Alternative 4 – Mothballing.

The proposed project was selected as this option represents the broadest range of potential impacts among the alternatives currently under consideration. By evaluating that scenario, and then studying multiple alternatives against it, the Draft EIR provides the City Council and the public with the most comprehensive information possible regarding the environmental consequences, benefits, and tradeoffs associated with each option. The City Council is required to consider the information in the Draft EIR in deciding whether to approve the project, but the Draft EIR does not recommend either approval or denial of a project.

ATTACHMENTS

1. Attachment 1 - Halsey House Draft EIR
2. Attachment 2 - Appendix A Notice of Preparation and Comments
3. Attachment 3 - Appendix B CalEEMod Halsey House Demolition Project Detailed Report
4. Attachment 4 - Appendix C Biological Resources Report
5. Attachment 5 - Appendix D Historic Resources Evaluation
6. Attachment 6 - Appendix E Geotechnical Investigation
7. Attachment 7 - Appendix F Hydrologic Evaluation
8. Attachment 8 - Appendix G Relocation Feasibility Study
9. 06-23-2026 Written Public Comment

Draft EIR
Halsey House Project
SCH #: 2025020308



June 2026

Table of Contents

Section 1.0	Introduction and Purpose	iii
Section 2.0	Summary	v
Section 3.0	Project Information and Description	1
Section 4.0	Environmental Setting, Impacts, and Mitigation	6
4.1	Aesthetics	9
4.2	Agriculture and Forestry Resources	17
4.3	Air Quality	21
4.4	Biological Resources	34
4.5	Cultural Resources	46
4.6	Energy	59
4.7	Geology and Soils	62
4.8	Greenhouse Gas Emissions	70
4.9	Hazards and Hazardous Materials	74
4.10	Hydrology and Water Quality	83
4.11	Land Use and Planning	90
4.12	Mineral Resources	93
4.13	Noise	95
4.14	Population and Housing	102
4.15	Public Services	104
4.16	Recreation	109
4.17	Transportation	111
4.18	Tribal Cultural Resources	115
4.19	Utilities and Service Systems	118
4.20	Wildfire	123
Section 5.0	Growth-Inducing Impacts	125
Section 6.0	Significant and Irreversible Environmental Changes	126
Section 7.0	Significant and Unavoidable Impacts	127
Section 8.0	Alternatives	128
Section 9.0	References	141
Section 10.0	Lead Agency and Consultants	146
Section 11.0	Acronyms and Abbreviations	147

Figures

Figure 3.1-1: Regional Map	2
Figure 3.1-2: Vicinity Map	3
Figure 3.1-3: Aerial Photograph, Project Boundary, and Surrounding Land Uses	4

Photos

Photo 1: Photo of existing building	11
Photo 2: Photo of existing building and pathway	11
Photo 3: Photo of Adobe Creek.	12
Photo 4: Photo of redwood trees and pathways in the surrounding area	12
Photo 5: Photo of pedestrian bridge.	13
Photo 6: Photo of entrance to Redwood Grove Nature Preserve	13

Tables

Table 4.0-1: Cumulative Projects List	7
Table 4.0-2: Geographic Considerations in Cumulative Analysis	8
Table 4.3-1: Sources and Health Effects of Criteria Air Pollutants and Toxic Air Contaminants	22
Table 4.3-2: Bay Area Air District Air Quality Significance Thresholds	27
Table 4.3-3: Bay Area Air District Health Risks and Hazards Thresholds	27
Table 4.3-4: Average Daily Emissions Demolition Criteria Pollutant Emissions	29
Table 4.13-1: Groundborne Vibration Impact Criteria	96
Table 4.13-2: Exterior Noise Limits	97
Table 4.13-3: Vibration Levels for Typical Construction Equipment	100
Table 8.2-1: Comparison of Impacts from Alternatives to the Proposed Project	140

Appendices

Appendix A: Notice of Preparation and Comments Received
Appendix B: California Emissions Estimator Model Report
Appendix C: Biological Resources Report
Appendix D: Historic Resources Evaluation
Appendix E: Geotechnical Investigation
Appendix F: Hydrologic Evaluation
Appendix G: Relocation Feasibility Study

Section 1.0 Introduction and Purpose

1.1 Purpose of the Environmental Impact Report

An Environmental Impact Report (EIR) is an informational document that assesses potential environmental impacts of a proposed project, as well as identifies mitigation measures and alternatives to the proposed project that could reduce or avoid adverse environmental impacts (CEQA Guidelines 15121(a)). As the CEQA Lead Agency for this project, the City of Los Altos is required to consider the information in the EIR along with any other available information in deciding whether to approve the project. The basic requirements for an EIR include discussions of the environmental setting, significant environmental impacts including growth-inducing impacts, cumulative impacts, mitigation measures, and alternatives. It is not the intent of an EIR to recommend either approval or denial of a project.

1.2 EIR Process

1.2.1 Notice of Preparation and Scoping

In accordance with Section 15082 of the CEQA Guidelines, the City of Los Altos prepared a Notice of Preparation (NOP) for this EIR. The NOP was circulated to local, state, and federal agencies on February 12, 2025. The standard 30-day comment period concluded on March 14, 2025. The NOP provided a general description of the proposed project and identified possible environmental impacts that could result from implementation of the project. Appendix A of this EIR includes the NOP and comments received on the NOP.

1.2.2 Draft EIR Public Review and Comment Period

Publication of this Draft EIR will mark the beginning of a 45-day public review period. During this period, the Draft EIR will be available to the public and local, state, and federal agencies for review and comment. Notice of the availability and completion of this Draft EIR will be sent directly to every agency, person, and organization that commented on the NOP, as well as the Governor's Office of Planning and Research (OPR). Written comments concerning the environmental review contained in this Draft EIR during the 45-day public review period should be sent to:

Harun Musaefendic
Public Works Department
City of Los Altos
1 N. San Antonio Road
Los Altos, CA 94022
halseyhouseeir@losaltosca.gov

1.3 Final EIR/Responses to Comments

Following the conclusion of the 45-day public review period, the City of Los Altos will prepare a Final EIR in conformance with CEQA Guidelines Section 15132. The Final EIR will consist of:

- Revisions to the Draft EIR text, as necessary;
- List of individuals and agencies commenting on the Draft EIR;
- Responses to comments received on the Draft EIR, in accordance with CEQA Guidelines (Section 15088);
- Copies of letters received on the Draft EIR.

Section 15091(a) of the CEQA Guidelines stipulates that no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings. If the lead agency approves a project despite it resulting in significant adverse environmental impacts that cannot be mitigated to a less than significant level, the agency must state the reasons for its action in writing. This Statement of Overriding Considerations must be included in the record of project approval.

1.3.1 Notice of Determination

If the project is approved and the EIR is adopted, the City of Los Altos will file a Notice of Determination (NOD), which will be available for public inspection and posted at the County Clerk's Office and the State Clearinghouse for public review for 30 days. The filing of the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15094(g)).

Section 2.0 Summary

2.1 Summary of Project

The project site is located at 482 University Avenue in Los Altos within the six-acre Redwood Grove Nature Preserve (Preserve). The Preserve is surrounded by single-family residences. The Halsey House, built in 1923, is a local Historic Landmark and is eligible for the California Register of Historic Resources (CRHR). The Halsey House is currently boarded up, and a locked fence surrounds the building to secure the site and prevent intruders. The project proposes to demolish the Halsey House building.

2.2 Summary of Significant Impacts

The following Table 2.2-1 is a summary of the significant environmental impacts identified and discussed in the EIR, and the mitigation measures proposed to avoid or reduce those impacts. The project description and full discussion of the impacts and mitigation measures can be found in Section 3.0 Project Information and Description and Section 4.0 Environmental Setting, Impacts, and Mitigation of this EIR. Alternatives to the proposed project are summarized at the end of this section and described in more detail in Section 8.0 Alternatives.

Table 2.2-1: Summary of Significant Impacts and Mitigation Measures

Significant Impacts	Mitigation Measures
Biological Resources	
Impact BIO-1: Disturbance of the existing woodrat nests on-site could result in the destruction of nests and injury or mortality of individual woodrats. (Less than Significant Impact with Mitigation Incorporated)	MM BIO-1.1: Pre-Activity Survey. A qualified biologist shall conduct a pre-activity survey for San Francisco dusky-footed woodrat nests within 30 days of the start of work activities. If active woodrat nests are determined to be present in, or within 10 feet of, the impact areas, MM BIO-1.2 and MM BIO-1.3 below shall be implemented, as appropriate. MM BIO-1.2: Avoidance Buffers. Active woodrat nests that are detected in, or within 10 feet of, the impact areas shall be avoided. A minimum 10-foot buffer shall be maintained between project activities and woodrat nests to avoid disturbance. In some situations, a smaller buffer may be allowed if, in the opinion of a qualified biologist, nest relocation (MM BIO-1.3 below) would represent a greater disturbance to the woodrats than the adjacent work activities. MM BIO-1.3: Nest Relocation. If avoidance of active woodrat nests within and immediately adjacent to the work impact is not feasible (e.g., because it would preclude implementation of the project), then nest materials shall be relocated to suitable habitat as close to the project area as possible, as determined and implemented by a qualified biologist (ideally,

Significant Impacts	Mitigation Measures
	within or immediately adjacent to the project site). Relocation efforts shall avoid the peak nesting season (February to July). Prior to the start of work activities, a qualified biologist shall disturb the woodrat nest to the degree that all woodrats leave the nest and seek refuge outside of the impact area. Disturbance of the woodrat nest shall be initiated no earlier than one hour before dusk to prevent the exposure of woodrats to diurnal predators. Subsequently, the biologist shall dismantle and relocate the nest material by hand. During the deconstruction process, the biologist shall assess if there are juveniles in the nest. If immobile juveniles are observed, the dismantling process shall be discontinued until a time when the biologist believes the juveniles will be capable of independent survival (typically after two to three weeks). A no-disturbance buffer shall be established around the nest until the juveniles are mobile. The nest may be dismantled once the biologist has determined that adverse impacts on the juveniles would not occur.
Impact BIO-2: Demolition of the structure on-site would disturb Townsend's big-eared bats roosting within the structure. (Less than Significant Impact with Mitigation Incorporated)	MM BIO-2.1: Bat Exclusion from Halsey House. Prior to the start of any project-related activities on the exterior or interior of the Halsey House building, a qualified bat biologist shall guide and supervise the installation of appropriate exclusion devices to allow any roosting Townsend's big-eared bats (and other bat species, if present) to vacate the roost and prevent bats from reoccupying these features before construction activities are initiated. Bird exclusion netting shall not be used because bats may become entangled in it, potentially leading to mortality. Exclusion materials shall be inspected by a qualified biologist once per month between their installation and initiation of building demolition, to ensure that the materials are in good working order. If exclusion materials become compromised, the City shall perform maintenance on these devices, as directed by the qualified biologist.
Cultural Resources	
Impact CUL-1: Implementation of the proposed project would result in the demolition of the Halsey House, which is a historic resource. (Significant and Unavoidable Impact)	MM CUL-1.1: Historic Resources Mitigation Action Plan. Prior to issuance of any demolition permits, the City shall retain a qualified historian to prepare and submit a Historic Resources Mitigation Action Plan (Action Plan) to the Director of Development Services or the Director's designee for review and approval. The Action Plan shall include the following elements: Documentation. The structure and associated features on the project site shall be documented in accordance with the guidelines established for the Level III Historic American Building Survey (HABS) consistent with the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The documentation shall be funded by the City and undertaken by a qualified historian who meets the

Significant Impacts	Mitigation Measures
	Secretary of the Interior’s Professional Qualification Standards for history, architectural history, or historic architecture (Code of Federal Regulations, Title 36, Part 61, Appendix A). The documentation shall consist of the following components: A. Drawings – Original architectural drawings or as-built measured drawings of the building shall be submitted as part of the documentation package. Reasonable efforts shall be made to locate original drawings of the historic building. If located, selected representative drawings (such as site plans, elevations, sections, and relevant key details) shall be photographed or scanned at high resolution, reproduced, and included in the dataset. If original architectural or construction drawings cannot be located, then measured drawings shall be prepared according to HABS guidelines by a professional who meets the Secretary of the Interior’s Professional Qualification Standards for Architecture or Historic Architecture. The measured drawings shall be reviewed by the historian retained to prepare the written historical report. B. Photographs – Digital photographs shall be taken of the historic building, associated landscaping, and the overall character and setting of the property. All digital photography shall be conducted according to current National Park Service (NPS) standards as specified in the National Register of Historic Places and National Historic Landmarks Program Consolidated and Updated Photograph Policy 2024. The photography shall be undertaken by a qualified professional with demonstrated experience in documentation photography. Large format negatives are not required. All photographs shall be referenced on a photographic key map or site plan. The photographic key shall show the photograph number with an arrow to indicate the direction of the view. Digital photographs shall be taken in uncompressed RAW file format and saved as TIFF files. The size of each image shall be a minimum of 1600x1200 pixels at 300 pixels per inch or larger and in color format. The file name for each electronic image shall correspond with the index of photographs and photograph label. C. Written Data – A written historical narrative and report that meets the HABS Historical Report Guidelines shall be produced for the property by a qualified historian. The HABS-Style Historical Report shall follow the outline format with a statement of significance of the property. The documentation shall be submitted to the Director of Development Services or the Director’s designee for review and approval. After approval, the required documentation shall be filed with the Northwest Information Center at Sonoma State University (the repository for the California

Significant Impacts	Mitigation Measures
	Historical Resources Information System) and the Los Altos History Museum. Interpretive Display. Prior to issuance of any demolition permits, the City, in consultation with a qualified historian or architectural historian who meets the Secretary of the Interior’s Professional Qualification Standards, shall provide plans for interpretive signage for the property to provide historical context and education about the history of the property. The plans shall include the proposed display type(s) and location(s) of the content, as well as high-quality graphics and written narratives that will be incorporated. In addition to narrative text, the interpretive display(s) may include, but are not limited to, a display of photographs, news articles, and drawings. The permanent, high-quality interpretive display(s) shall be installed within the project site boundaries, made of durable all-weather materials, and positioned to allow for high public visibility and interactivity. The signage plan shall be reviewed and approved by the Director of Development Services or the Director’s designee prior to issuance of any demolition permits. MM CUL-1.2: Salvage. The structure shall be made available for salvage to companies facilitating the reuse of historic building materials prior to the issuance of any demolition permits. The time frame available for salvage shall be established by the Director of Development Services or the Director’s designee in accordance with the Action Plan. The City must provide evidence to the Director of Development Services or the Director’s designee that this condition has been met prior to the issuance of any demolition permits.
Impact HAZ-1: Demolition of the existing building could expose construction workers or residents in the vicinity of the project site to harmful levels of asbestos-containing materials or lead-based paint. (Less than Significant Impact with Mitigation Incorporated)	MM HAZ-1.1: Pre-Demolition Survey. In conformance with State and local laws, a visual inspection/pre-demolition survey, and possible sampling, shall be conducted prior to the demolition of on-site buildings to determine the presence of asbestos-containing materials and/or lead-based paint. MM HAZ-1.2: Removal of Asbestos-Containing Materials. All potentially friable asbestos-containing materials shall be removed in accordance with National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines prior to any building demolition or renovation that may disturb the materials. All demolition activities will be undertaken in accordance with Cal/OSHA standards contained in Title 8 of California Code of Regulations (CCR), Section 1529, to protect workers from exposure to asbestos. A registered asbestos abatement contractor shall be retained to remove and dispose of asbestos-containing materials identified in the asbestos survey performed for the site in accordance with the aforementioned standards. Materials containing more than one percent asbestos are also subject to Bay Area Air District (Air District) regulations. Removal of materials containing

Significant Impacts	Mitigation Measures
	more than one percent asbestos shall be completed in accordance with Air District requirements. MM HAZ-1.3: Removal of Lead-Based Paint. Prior to demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR 1523.1, including employee training, employee air monitoring, and dust control. Any debris or soil containing lead-based paint or coatings would be disposed of at landfills that meet acceptance criteria for the waste being disposed.

2.3 Significant Unavoidable Impacts

This EIR includes a detailed discussion of the existing setting, impacts, and mitigation measures proposed to protect environmental resources and avoid and/or reduce impacts. The analysis concluded that the proposed project would result in a significant and unavoidable impact to a historic resource. The impact is identified in the EIR as follows:

- **Impact CUL-1:** Implementation of the proposed project would result in the demolition of the Halsey House, which is a historic resource. **(Significant and Unavoidable Impact)**

2.4 Summary of Alternatives to the Proposed Project

CEQA requires that an EIR identify alternatives to the project as proposed. CEQA Guidelines Section 15126.6 specifies that an EIR must identify alternatives that would feasibly attain the most basic objectives of the project but avoid or substantially lessen the project's significant environmental effects or would further reduce impacts that are considered less than significant with the incorporation of identified mitigation. A summary of the alternatives follows. A full analysis of project alternatives is provided in Section 8.0 Alternatives.

The EIR analyzed the following alternatives to the proposed project:

- No Project Alternative
- Preservation Alternative 1 – Relocation of Historic Resource Off-Site
- Preservation Alternative 2 – Full Rehabilitation of Historic Resource
- Preservation Alternative 3 – Partial Rehabilitation/Partial Demolition
- Preservation Alternative 4 – Mothballing

2.5 Areas of Public Controversy

Areas of public concern identified during the Notice of Preparation (NOP) scoping process include:

- Request for a public scoping meeting
- Reconsider feasibility of equipment access because the eight-ton bridge has potentially deteriorated
- Potential existing creekbank soil contamination from septic tank
- Potential existing lead contamination from water pipes
- Consultation with Native American tribes that are traditionally and culturally affiliated with the geographic area of the project
- Whether proposed “native plant landscaping” aims to meet aesthetic or ecological restoration needs
- Project should not impact Valley Water’s native plant mitigation site on Adobe Creek at the Jesuit Retreat
- Potential project impact to redwood forest and riparian woodlands, in addition to wetlands

Section 3.0 Project Information and Description

3.1 Project Location

The project site is located at 482 University Avenue in Los Altos (Assessor Parcel Number [APN] 175-30-021). The site is situated within the six-acre Preserve, which is surrounded by single-family residences. Refer to Figures 3.1-1 and Figure 3.1-2 for regional and vicinity maps of the project site. An aerial photograph showing the project boundary and surrounding land uses is shown on Figure 3.1-3.

3.2 Background

The Halsey House was built in 1923 and was used as a private residence until the property was purchased by the City of Los Altos in 1974 to serve as a park. The building was then converted into a nature center for educational and recreational programming. In 2008, the building was closed to the public. Since 2008, the Halsey House has remained vacant and unused. The building is currently boarded up and surrounded by a locked fence to secure the site and prevent intruders. The Halsey House is a local Historic Landmark and is eligible for the CRHR. As a result, it is considered a historic resource under CEQA.

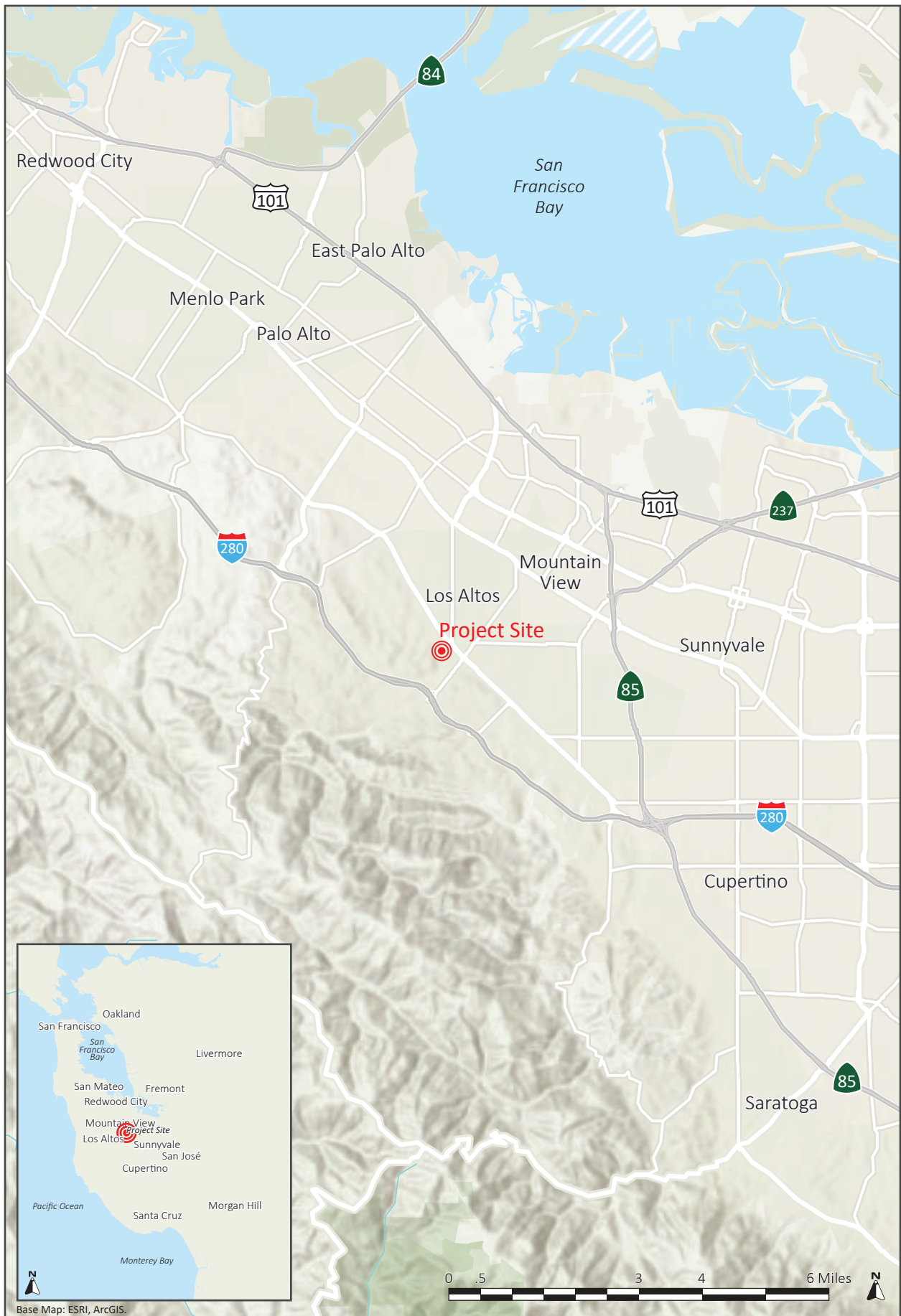
Since its closure in 2008, the City has explored various treatments for the Halsey House, including full rehabilitation, adaptive reuse, mothballing, and full demolition. This EIR analyzes the impacts associated with full demolition of the building.

3.3 Project Description

3.3.1 Demolition Details

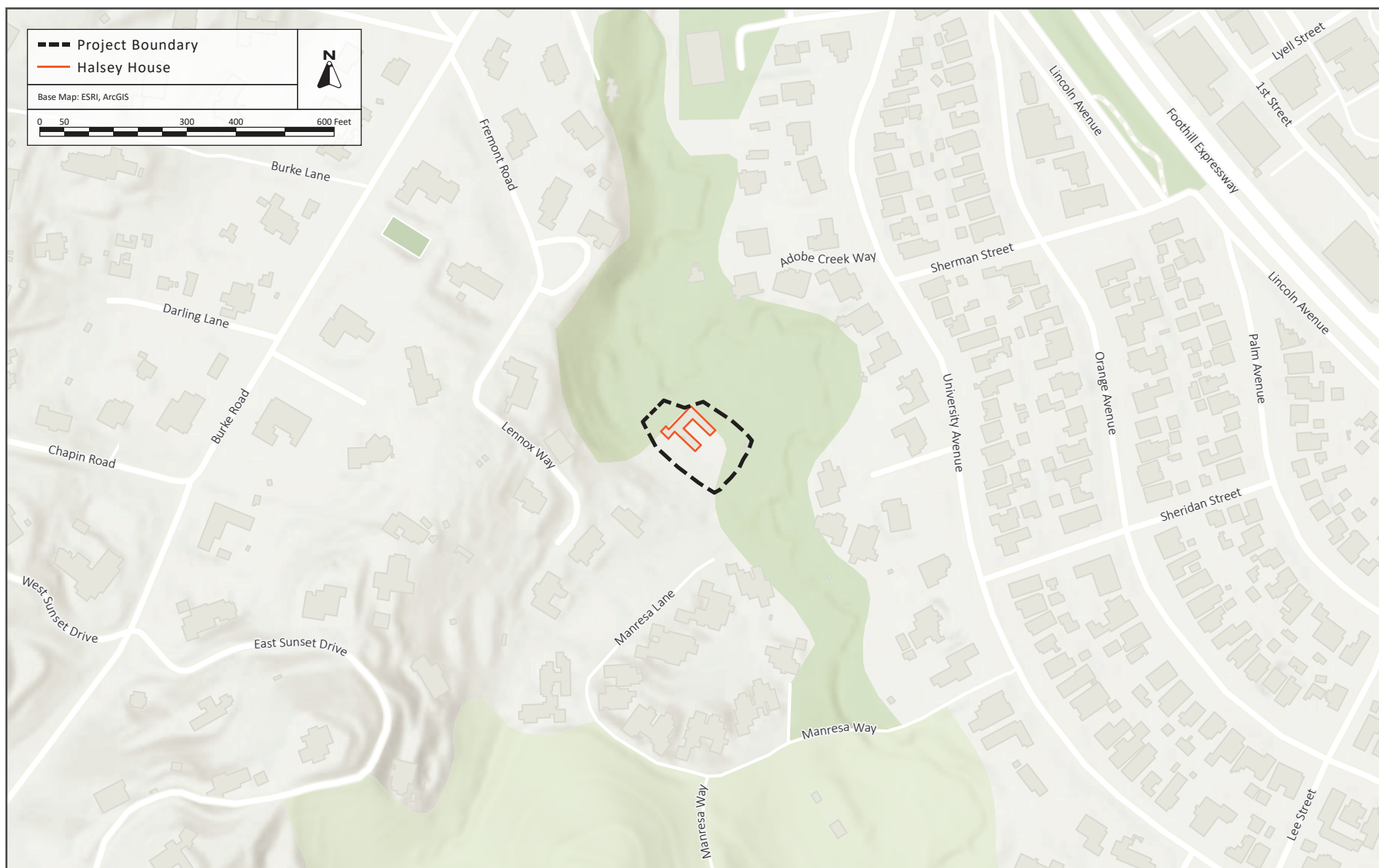
The project proposes to demolish the Halsey House. Demolition activities would occur within an approximately 15,000 square foot (or 0.3 acre) area of disturbance surrounding the building (also referred to as the project boundary) and would last roughly three months. Equipment and workers would access the site via the Preserve entrance on University Avenue. Equipment staging would occur within the proposed area of disturbance. Refer to Figure 3.1.3 for the area of disturbance.

Demolition equipment, such as an excavator and a compact track loader, would be utilized throughout the demolition period. Due to the weight capacity and width (approximately eight tons and 10 feet, respectively) of the pedestrian bridge that crosses Adobe Creek and provides access to the Halsey House, the equipment used for demolition would be small and lightweight. For example, the compact track loader would weigh seven tons and the excavator would weigh six tons.



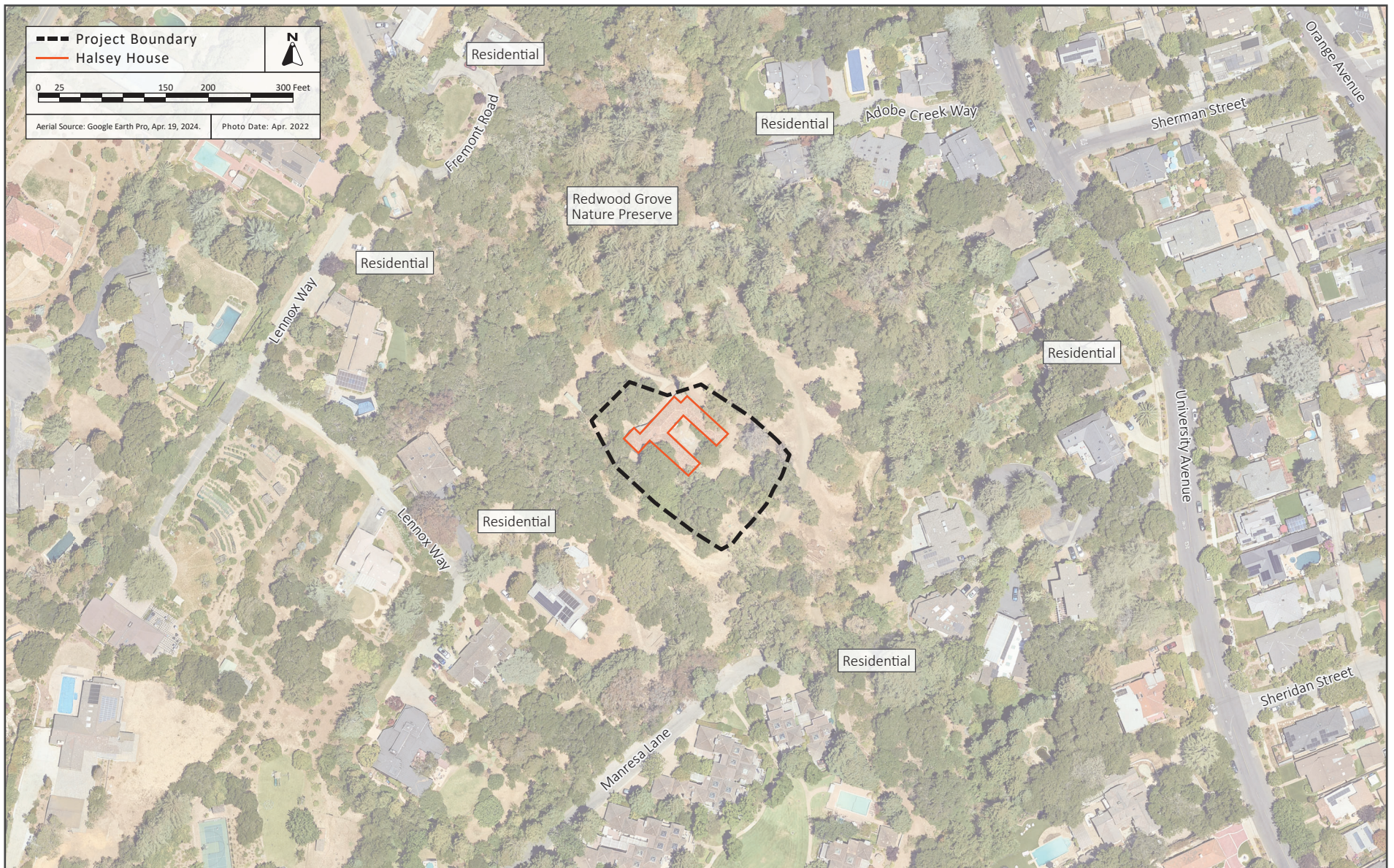
REGIONAL MAP

FIGURE 3.1-1



VICINITY MAP

FIGURE 3.1-2



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

FIGURE 3.1-3

Service utility trucks weighing approximately four tons would be used for hauling. The service trucks would be able to hold a maximum of three tons. When hauling materials off-site, the service utility trucks would weigh seven tons total.

During demolition, construction equipment and manual labor would be used to tear down the Halsey House. Some of the demolition would be completed manually with hand tools due to the weight and width constraints of the pedestrian bridge. After demolition of the building, the site would be cleared and replanted with native plant vegetation that matches the existing vegetation in the Preserve. Building materials would be hauled to an appropriate off-site disposal location.

The proposed project would remove two trees, neither of which qualify as protected trees under the City's Tree Protection Ordinance.

3.4 Project Objectives

Pursuant to CEQA Guidelines Section 15124, the EIR must include a statement of the objectives sought by the proposed project. Project objectives as proposed by the City include:

- Protect the health, safety, and welfare of the surrounding community by eliminating safety hazards associated with the Halsey House building, which is currently vacant and in a state of disrepair.
- Maintain and improve public open space at the project site through restoration of landscaped areas and enhanced open space accessibility and visibility.
- Reduce or eliminate ongoing maintenance costs associated with an unused public facility.
- Reduce or eliminate the cost to rehabilitate the existing structure to a usable condition.
- Comply with the Secretary of the Interior's Standards as necessary.

3.5 Uses of the EIR

This Draft EIR is intended to provide the City of Los Altos, other public agencies, and the general public with the relevant environmental information needed in considering the proposed project. The City of Los Altos anticipates the following permit approvals by the City will be required to implement the project addressed in this Draft EIR:

- Demolition Permit
- Historic Alteration Permit
- Tree Removal Permit
- Watercourse Protection Permit

Section 4.0 Environmental Setting, Impacts, and Mitigation

This section presents the discussion of impacts related to the following environmental subjects in their respective subsections:

4.1	Aesthetics	4.11	Land Use and Planning
4.2	Agriculture and Forestry Resources	4.12	Mineral Resources
4.3	Air Quality	4.13	Noise
4.4	Biological Resources	4.14	Population and Housing
4.5	Cultural Resources	4.15	Public Services
4.6	Energy	4.16	Recreation
4.7	Geology and Soils	4.17	Transportation
4.8	Greenhouse Gas Emissions	4.18	Tribal Cultural Resources
4.9	Hazards and Hazardous Materials	4.19	Utilities and Service Systems
4.10	Hydrology and Water Quality	4.20	Wildfire

The discussion for each environmental subject includes the following subsections:

Environmental Setting – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.

Impact Discussion – This subsection includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts.

- **Project Impacts** – This subsection discusses the project’s impact on the environmental subject as related to the checklist questions. For significant impacts, feasible mitigation measures are identified. “Mitigation measures” are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Mitigation measures are numbered to correspond to the impact they address. For example, MM BIO-1.3 refers to the third mitigation measure for the first impact in the Biological Resources section.
- **Cumulative Impacts** – This subsection discusses the project’s cumulative impact on the environmental subject. Cumulative impacts, as defined by CEQA, refer to two or more individual effects, which when combined, compound or increase other environmental impacts. Cumulative impacts may result from individually minor, but collectively significant effects taking place over a period of time. CEQA Guideline Section 15130 states that an EIR should discuss cumulative impacts “when the project’s incremental effect is cumulatively considerable.” The discussion does not need to be in as great detail as is necessary for project impacts, but is to be “guided by the standards of practicality and reasonableness.”

The purpose of the cumulative analysis is to allow decision makers to better understand the impacts that might result from approval of past, present, and reasonably foreseeable future projects, in conjunction with the proposed project addressed in this EIR.

The CEQA Guidelines advise that a discussion of cumulative impacts should reflect both their severity and the likelihood of their occurrence (CEQA Guidelines Section 15130(b)). To accomplish these two objectives, the analysis should include either a list of past, present, and probable future projects or a summary of projections from an adopted general plan or similar document (CEQA Guidelines Section 15130(b)(1)). This EIR uses the list of projects approach.

The analysis must determine whether the project's contribution to any cumulatively significant impact is cumulatively considerable, as defined by CEQA Guideline Section 15065(a)(3). The cumulative impacts discussion for each environmental issue accordingly addresses the following issues: 1) would the effects of all of past, present, and probable future (pending) development result in a significant cumulative impact on the resource in question; and, if that cumulative impact is likely to be significant, 2) would the contribution from the proposed project to that significant cumulative impact be cumulatively considerable?

Table 4.0-1 identifies the approved (but not yet constructed or occupied) and pending projects in the project vicinity that are evaluated in the cumulative analysis.

Table 4.0-1: Cumulative Projects List

Name and Location	Description	Distance to Proposed Project	Estimated Schedule	
			Start	Finish
Los Altos Library Courtyard Project	The project includes the construction of a courtyard on the northern part of the existing City library.	3,380 feet northeast	N/A	N/A
Adobe Sewer Replacement Project	The project would replace the Adobe Creek Sewer Main which includes 53 sewer lines in the City.	Adjacent to the south	2026	2029

For each resource area, cumulative impacts may occur over different geographic areas. For example, the project effects on air quality would combine with the effects of projects in the entire air basin, whereas noise impacts would primarily be localized to the surrounding area. The geographic area that could be affected by the proposed project varies depending upon the type of environmental issue being considered. Section 15130(b)(3) of the CEQA Guidelines states that lead agencies should define the geographic scope of the area affected by the cumulative effect. Table 4.0-2 provides a summary of the different geographic areas used to evaluate cumulative impacts.

Table 4.0-2: Geographic Considerations in Cumulative Analysis

Resource Area	Geographic Area
Aesthetics	Project site and adjacent parcels
Agriculture and Forestry Resources	Countywide
Air Quality	San Francisco Bay Area Air Basin
Biological Resources	Project site and adjacent parcels
Cultural Resources	Project site and adjacent parcels
Energy	Energy provider's territory
Geology and Soils	Project site and adjacent parcels
GHGs	Planet-wide
Hazards and Hazardous Materials	Project site and adjacent parcels
Hydrology and Water Quality	Lower Peninsula watershed
Land Use and Planning/Population and Housing	Citywide
Minerals	Identified mineral recovery or resource area
Noise and Vibration	Project site and adjacent parcels
Public Services and Recreation	Citywide
Transportation/Traffic	Citywide
Tribal Cultural Resources	Project site and adjacent parcels
Utilities and Service Systems	Citywide
Wildfire	Within or adjacent to the wildfire hazard zone

4.1 Aesthetics

4.1.1 Environmental Setting

4.1.1.1 *Regulatory Framework*

State

Streets and Highway Code Sections 260 through 263

The California Scenic Highway Program (Streets and Highway Code, Sections 260 through 263) is managed by the California Department of Transportation (Caltrans). The program is intended to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment.

Local

Los Altos General Plan

The City of Los Altos General Plan (General Plan) was adopted in November 2002 and serves as the primary source of long-range planning and policy direction used to guide growth and preserve the quality of life within the City. Implementation of the General Plan ensures future development is consistent with the community's goals and that adequate urban services are available to meet the needs of new development. The General Plan is divided into eight different elements, each of which describe issues, goals, and policies related to the element topic. The eight elements include Community Design and Historic Resources, Land Use, Housing, Economic Development, Open Space, Conservation and Community Facilities, Circulation, Natural Environment and Hazards, and Infrastructure and Waste Disposal.

The following policies in the General Plan have been adopted for the purpose of reducing or avoiding impacts related to aesthetic resources and are applicable to the project.

Policy	Description
OSCC 4.1	Provide adequate level of maintenance for City parks, open space, and public property to ensure safety, aesthetics, and recreational enjoyment for Los Altos residents.

Los Altos Municipal Code

The City of Los Altos Municipal Code (LAMC) contains provisions and laws adopted by the City Council to maintain a healthy and safe community and to preserve the quality of life in Los Altos. Title 14 (Zoning) of the LAMC provides development standards and regulations that are meant to enhance the visual quality of new development through building height limits, building density, building design and landscaping standards, setback requirements, sign regulations, open space requirements, and lighting requirements. These standards and regulations are provided for each individual zoning district. Title 14 also outlines the design review process for new projects within

the City, in addition to the required design review findings that projects must meet.

4.1.1.2 *Existing Conditions*

Project Site

The Halsey House is one-story building characterized by stucco cladding and a hipped¹ clay tile roof. The structure is generally U-shaped and is arranged around a private courtyard with bench seating and a fountain. The structure is currently vacant, boarded up, and encircled by chain link fencing. Views of the project site are shown in Photos 1 and 2.

Surrounding Area

The project site is within the Preserve, a local park. The park is characterized by mature redwood and oak trees with walking paths around the perimeter and along Adobe Creek, which runs through the park. Surrounding development consists primarily of one- to two-story single-family residences. Views of the surrounding area are shown in Photos 3 through 6.

Scenic Vistas and Resources

There are no designated scenic vistas in Los Altos.² The project site is located in a suburban area developed with single-family residences. The project area is relatively flat land parkland situated at a lower elevation than surrounding development. The Preserve consists of stands of mature Redwood trees, which limits the number of expansive views from the project site.

Scenic Corridors and Highways

State-designated scenic highways include State Route (SR) 9 from the Santa Cruz County line to the Los Gatos City Limit, and Interstate 280 (I-280) from the San Mateo County line to Santa Clara County line. Eligible State Scenic Highways (not officially designated) include SR 17 from the Santa Cruz County line to SR 9, SR 35 from Santa Cruz County line to SR 9, I-280 from the San Mateo County line to SR 17, and the entire length of SR 152 within the County.

There are no state-designated scenic highways in Los Altos.³ The project site is located approximately five miles east of the nearest officially designated state scenic highway segment along I-280.

¹ A hipped roof is a roof where all four sides of the roof slope downwards from the peak.

² City of Los Altos. *Initial Study/Mitigated Negative Declaration for the Los Altos General Plan Update*. November 2002. Page 12.

³ California Department of Transportation. "Scenic Highways." Accessed December 19, 2025.

<https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.



Photo 1: Photo of existing building.



Photo 2: Photo of existing building and pathway.

PHOTOS 1 & 2



Photo 3: Photo of Adobe Creek.



Photo 4: Photo of redwood trees and pathways in surrounding area.

PHOTOS 3 & 4



Photo 5: Photo of pedestrian bridge.



Photo 6: Photo of entrance to Redwood Grove Nature Preserve.

PHOTOS 5 & 6

4.1.2 Impact Discussion

For the purpose of determining the significance of the project's impact on aesthetics, except as provided in Public Resources Code Section 21099, would the project:

- 1) Have a substantial adverse effect on a scenic vista?
- 2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- 3) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?⁴ If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
- 4) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

4.1.2.1 Project Impacts

-
- a) Would the project have a substantial adverse effect on a scenic vista?
-

As discussed in Section 4.1.1.2 Existing Conditions, the project site is located within the Preserve and surrounded by existing residences. The project site and surrounding area are relatively flat and there are no scenic vistas visible on or through the site. For these reasons, the project would not have a substantial adverse effect on a scenic vista. **(No Impact)**

-
- b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
-

The project site is not located within a state-designated scenic highway. As discussed in Section 4.1.1.2 Existing Conditions, the nearest state-designated scenic highways to the project site are I-280 and SR 9. The project site is approximately five miles southeast of I-280 and approximately eight miles north of SR 9. Because the project site is not located within a state-designated scenic highway, implementation of the project would not damage scenic resources within a state-designated scenic highway. **(No Impact)**

⁴ Public views are those that are experienced from publicly accessible vantage points.

-
- c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
-

The project consists solely of the demolition of the Halsey House and would not include the construction of a new building. The removal of the structure and revegetation of the site would leave the project site consistent with the surrounding undeveloped parkland within the Preserve. Therefore, there would be no change or degradation to the scenic quality or conflict with scenic quality zoning regulations. **(No Impact)**

- d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?
-

The project consists solely of the demolition of the Halsey House and would not include the construction of a new building or installation of new lighting. Therefore, there would be no new sources of substantial light or glare. **(No Impact)**

4.1.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a significant cumulative aesthetics impact?

The geographic area for cumulative aesthetics impacts is limited to the project site and adjacent development from which the project site would be visible. The Adobe Creek Sewer Project identified in Table 4.0-1 is adjacent to the site; however, it would consist of improvements to underground infrastructure and would not have any aesthetic impacts.

Scenic Vistas

The project site and surrounding area have minimal to no scenic views due to the existing built environment with no designated scenic resources. Therefore, the project would not contribute to a cumulatively significant impact to scenic vistas. **(No Cumulative Impact)**

Scenic Resources within a State Scenic Highway

The project would have no impact on scenic resources within a state scenic highway and, therefore, would not contribute to a cumulatively significant impact to those resources. **(No Cumulative Impact)**

Scenic Quality

The project would not contribute to a cumulatively significant conflict with zoning and other regulations governing scenic quality since no development is proposed. **(No Cumulative Impact)**

Lighting or Glare

The project would not contribute to any lighting or glare because no development or the installation of any lighting is proposed. Therefore, the project would not contribute to a cumulatively significant light and glare impact. **(No Cumulative Impact)**

For the reasons described above, the project would have no cumulative aesthetic impacts. **(No Cumulative Impact)**

4.2 Agriculture and Forestry Resources

4.2.1 Environmental Setting

4.2.1.1 *Regulatory Framework*

Farmland Mapping and Monitoring Program

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) assesses the location, quality, and quantity of agricultural land and conversion of these lands over time. Agricultural land is rated according to soil quality and irrigation status. The best quality land is identified as Prime Farmland. In CEQA analyses, the FMMP classifications and published county maps are used, in part, to identify whether agricultural resources that could be affected are present on-site or in the project area.⁵

California Land Conservation Act

The California Land Conservation Act (Williamson Act) enables local governments to enter into contracts with private landowners to restrict parcels of land to agricultural or related open space uses. In return, landowners receive lower property tax assessments. In CEQA analyses, identification of properties that are under a Williamson Act contract is used to also identify sites that may contain agricultural resources or are zoned for agricultural uses.⁶

Fire and Resource Assessment Program

The California Department of Forestry and Fire Protection (CAL FIRE) identifies forest land, timberland, and lands zoned for timberland production that can (or do) support forestry resources.⁷ Programs such as CAL FIRE's Fire and Resource Assessment Program and are used to identify whether forest land, timberland, or timberland production areas that could be affected are located on or adjacent to a project site.⁸

⁵ California Department of Conservation. "Farmland Mapping and Monitoring Program." Accessed December 19, 2025. <http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx>.

⁶ California Department of Conservation. "Williamson Act." Accessed December 19, 2025. <http://www.conservation.ca.gov/dlrp/lca>.

⁷ Forest Land is land that can support 10 percent native tree cover and allows for management of forest resources (California Public Resources Code Section 12220(g)); Timberland is land not owned by the federal government or designated as experimental forest land that is available for, and capable of, growing trees to produce lumber and other products, including Christmas trees (California Public Resources Code Section 4526); and Timberland Production is land used for growing and harvesting timber and compatible uses (Government Code Section 51104(g)).

⁸ California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed December 19, 2025. <http://frap.fire.ca.gov/>.

4.2.1.2 *Existing Conditions*

The project site is designated as Urban Built-Up Land which is defined as land with at least six structures per 10 acres.⁹ Common examples of Urban Built-Up Land are residential, institutional, industrial, commercial, landfill, golf course, airports, and other utility uses.

The project site has a General Plan designation of Parks and is within the Public and Community Facilities zoning district. The project site and surrounding sites are not used for agricultural, forestry, or timberland uses, nor are they subject to a Williamson Act contract.¹⁰

4.2.2 Impact Discussion

For the purpose of determining the significance of the project's impact on agriculture and forestry resources, would the project:

- 1) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- 2) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- 3) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?
- 4) Result in a loss of forest land or conversion of forest land to non-forest use?
- 5) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

4.2.2.1 *Project Impacts*

-
- a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
-

As discussed in Section 4.2.1.2 Existing Conditions, the project site is not designated for agricultural use. Therefore, the project would not result in the conversion of designated farmland to non-agricultural use. **(No Impact)**

⁹ California Department of Conservation. "California Important Farmland Finder." Accessed December 19, 2025. <https://maps.conservation.ca.gov/DLRP/CIFF/>.

¹⁰ County of Santa Clara. "Williamson Act Properties Map," Accessed December 19, 2025. <https://experience.arcgis.com/experience/034e46f2f4bc44d1ada505dd92940ff7>.

-
- b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?
-

As discussed in Section 4.2.1.2 Existing Conditions, the project site is within the Public and Community Facilities zoning district and is not zoned for agricultural use. Therefore, the project would not conflict with existing zoning for an agricultural use or a Williamson Act contract. **(No Impact)**

- c) Would the project conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?
-

The project site is not zoned, or adjacent to land zoned, for forest land, timberland, or Timberland Production. Therefore, the project would not conflict with existing zoning or cause rezoning of forest land or timberland uses. **(No Impact)**

- d) Would the project result in a loss of forest land or conversion of forest land to non-forest use?
-

Section 12220(g) of the California Public Resources Code defines forest land as “land that can support ten percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.” The Halsey House is located within the Preserve, which could meet the definition of forest land. However, the proposed project consists solely of the demolition of the Halsey House. After demolition of the building, the site would be cleared and replanted with native plant vegetation that matches the existing vegetation in the Preserve. Therefore, no forest land would be lost as a result of the project, nor would the project result in the conversion of existing forest land to non-forest uses. **(Less than Significant Impact)**

- e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?
-

As mentioned under checklist questions a) and d) above, the project site and adjacent properties are not designated or used as farmland or forest land. Therefore, development of the project would not cause the conversion of farmland to non-agricultural use or forest land to non-forest use. **(No Impact)**

4.2.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant agricultural and forestry resources impact?

The geographic area for cumulative agricultural and forestry resource impacts is Santa Clara County, since agricultural and forestry resources are mapped and managed at the county level. As discussed above, the project would not result in the conversion of farmland to non-agricultural use, loss of farmland or forestland, conversion of forestland to non-forest use, or the conversion of forest land to non-forest use. Therefore, the project would not contribute to a cumulatively significant agricultural and forestry resources impact. **(No Cumulative Impact)**

4.3 Air Quality

The following discussion is based, in part, on a California Emissions Estimator Model (CalEEMod) prepared internally by DJP&A. The report is attached to this EIR as Appendix B.

4.3.1 Environmental Setting

4.3.1.1 *Background Information*

Criteria Pollutants

Criteria air pollutants are pollutants that have established federal or State standards for outdoor concentrations to protect public health. Pursuant with the federal and State Clean Air Acts, the United States Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established and enforced the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), respectively. The NAAQS and CAAQS address the following criteria air pollutants: ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), particulate matter with a diameter of 10 microns or less (PM₁₀), particulate matter with a diameter of 2.5 microns or less (PM_{2.5}), sulfur dioxide (SO₂), and lead. The CAAQS also includes visibility reducing particles, sulfates, hydrogen sulfide, and vinyl chloride.

Toxic Air Contaminants

Toxic air contaminants (TACs) include airborne chemicals that are known to have short- and long-term adverse health effects. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, diesel fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway). Unlike criteria air pollutants, which have a regional impact, TACs are highly localized and regulated at the individual emissions source level.

DPM is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. DPM is comprised of diesel exhaust which is a complex mixture of gases, vapors, and fine particles. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (i.e., areas most susceptible to injury).¹¹ Chemicals in diesel exhaust, such as benzene and formaldehyde, are also TACs identified by the CARB.

An overview of the sources of criteria pollutants and TACs, as well as their associated health effects, is provided in Table 4.3-1.

¹¹ California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed December 19, 2025. <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>.

Table 4.3-1: Sources and Health Effects of Criteria Air Pollutants and Toxic Air Contaminants

Pollutants	Description and Sources	Primary Effects
Ozone (O ₃)	O ₃ is a secondary criteria air pollutant that is the result of a photochemical (sunlight) reaction between reactive organic gases (ROG) and nitrogen oxides (NO _x). Pollutants emitted by motor vehicles, power plants, industrial boilers, refineries, and chemical plants are the common source for this reaction. High O ₃ levels are caused by the cumulative emissions of ROG and NO _x . These precursor or primary pollutants react under certain meteorological conditions to form high O ₃ levels. Common sources of ROG and NO _x are vehicles, industrial plants, and consumer products.	• Aggravation of respiratory and cardiovascular diseases • Irritation of eyes • Cardiopulmonary function impairment
Nitrogen Dioxide (NO ₂)	NO ₂ is a reactive gas that combines with nitric oxide (NO) to form NO _x . NO ₂ is the byproduct of fuel combustion with common sources of NO ₂ being emissions from cars, trucks, buses, power plants, and off-road equipment. Sources of NO ₂ include motor vehicle exhaust, high temperature stationary combustion, and atmospheric reactions.	• Aggravation of respiratory illness • Reduced visibility
Carbon Monoxide (CO)	CO is a colorless, odorless, and toxic gas that is the product of incomplete combustion of carbon-containing substances (e.g., when something is burned). Common outdoor sources of CO include mobile vehicles (passenger cars and trucks) and machinery that burn fossil fuels.	• Interferes with oxygen delivery to the body's organ due to binding with the hemoglobin in the blood • Fatigue, headaches, confusion, and dizziness
Fine Particulate Matter (PM _{2.5}) and Coarse Particulate Matter (PM ₁₀)	Particulate Matter (PM) is any material that is emitted as liquid or solid particles or a gaseous material, such as dust, soot, aerosols, and fumes. PM ₁₀ and PM _{2.5} are both small enough particulates to be inhaled into the human lungs, and PM _{2.5} is small enough to deposit into the lungs, which poses an increased health risk compared to PM ₁₀ . Typical sources of PM include stationary combustion of solid fuels, construction activities, vehicles, industrial processes, and atmospheric chemical reactions.	• Reduced lung function, especially in children • Aggravation of respiratory and cardiorespiratory diseases • Increased cough and chest discomfort • Reduced visibility
Sulfur Dioxide (SO ₂)	SO ₂ is a pungent and colorless gaseous pollutant that is part of the sulfur oxides (SO _x) group and is the pollutant of greatest concern in the SO _x group. SO _x can react with other compounds in the atmosphere to form small particles. These particles contribute to pollution. SO ₂ is primarily formed from fossil fuel combustion at power plants and other industrial facilities. Sources of SO ₂ include motor vehicles, locomotives, ships, and off-road diesel equipment that are operated with fuels that contain high levels of sulfur. Industrial processes, such as natural gas and petroleum extraction, oil refining, and metal processing.	• Aggravation of respiratory illness • Respiratory irritation such as wheezing, shortness of breath and chest tightness • Increased incidence of pulmonary symptoms and disease, decreased pulmonary function

Pollutants	Description and Sources	Primary Effects
Lead	Lead is a naturally occurring element that can be found in all parts of the environment including the air, soil, and water. As an air pollutant, lead is present in small particles. The most common historic source of lead exposure was the past use of leaded gasoline in motor vehicles. The exhaust resulting from use of leaded gasoline would release lead emissions into the air. Now, major sources of lead in the air are from ore and metals processing plants and piston-engine aircraft operating on leaded aviation fuel. Other sources are waste incinerators, utilities, and lead-acid battery manufacturers. The highest air concentrations of lead are usually found near lead smelters.	Adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems and the cardiovascular system
Toxic Air Contaminants (TACs)	TACs include certain air pollutants known to increase the risk of cancer and/or a range of other serious health effects. Sources of TAC include, but are not limited to, cars and trucks, especially diesel-fueled; industrial sources, such as chrome platers; dry cleaners and service stations; and building materials and products.	- Cancer - Chronic eye, lung, or skin irritation - Neurological and reproductive disorders

Sensitive Receptors

Some groups of people are more affected by air pollution than others. CARB has identified the following groups who are most likely to be affected by air pollution: children under 16, the elderly over 65, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools.

4.3.1.2 Regulatory Framework

Federal and State

Clean Air Act

At the federal level, the EPA is responsible for overseeing implementation of the Clean Air Act and its subsequent amendments. The federal Clean Air Act requires the EPA to set national ambient air quality standards for the six common criteria pollutants, discussed previously; PM, O₃, CO, SO₂, NO₂, and lead.¹²

CARB is the state agency that regulates mobile sources throughout the state and oversees implementation of the state air quality laws and regulations, including the California Clean Air Act.

¹² NO_x is the group of nitrogen compounds (NO₂ and nitric oxide [NO]) that typically represents NO₂ emissions because NO₂ emissions contribute the majority of NO_x exhaust emissions emitted from fuel combustion.

The EPA and the CARB have adopted ambient air quality standards establishing permissible levels of these pollutants to protect public health and the climate. Violations of ambient air quality standards are based on air pollutant monitoring data and are determined for each air pollutant. Attainment status for a pollutant means that a given air district meets the standard set by the EPA and/or CARB.

Diesel Risk Reduction Plan

To address the issue of diesel emissions in the state, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. In addition to requiring more stringent emission standards for new on-road and off-road mobile sources and stationary diesel-fueled engines to reduce particulate matter emissions by 90 percent, this plan involves the application of emission control strategies to existing diesel vehicles and equipment to reduce DPM and other pollutants. Implementation of this plan, in conjunction with stringent federal and CARB-adopted emission limits for diesel fueled vehicles and equipment, including off-road equipment, will significantly reduce emissions of DPM and NO_x.

Regional

2017 Clean Air Plan

The Bay Area Air District (Air District) is the agency primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area (Bay Area), which includes the project area. Regional air quality management districts, such as the Air District, must prepare air quality plans specifying how federal and state air quality standards will be met. The Air District's most recently adopted plan is the Bay Area 2017 Clean Air Plan (CAP). The 2017 CAP focuses on the following two related Air District goals and how to achieve them:

- Protect air quality and health at the regional and local scale by attaining all state and national air quality standards and eliminating disparities among Bay Area communities in cancer health risk from TAC; and
- Protect the climate by reducing Bay Area greenhouse gas (GHG) emissions 40 percent below 1990 levels by 2040 and 80 percent below 1990 levels by 2050.¹³

CEQA Air Quality Guidelines

The Air District's CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the Bay Area. Jurisdictions in the Bay Area Air Basin utilize the thresholds and methodology for assessing air quality impacts developed by Air District within their CEQA Air Quality Guidelines. The guidelines include information on legal requirements, Air District rules, methods of analyzing impacts, and recommended mitigation measures. The latest CEQA Air Quality Guidelines are the 2022 CEQA Air Quality Guidelines adopted on April 20, 2023 by the Air District's Board of Directors.

¹³ Bay Area Air District. *Final 2017 Clean Air Plan*. April 19, 2017. Page 12.

Local

Los Altos General Plan

The following policies in the City's General Plan have been adopted for the purposes of reducing or avoiding impacts related to air quality, and are applicable to the project.

Policy	Description
LU 8.3	Interpret and implement the General Plan to be consistent with the regional Bay Area Air Quality Management Plan, as periodically updated.
LU 8.4	Ensure location and design of development projects so as to conserve air quality and minimize direct and indirect emissions of air contaminants.

4.3.1.3 *Existing Conditions*

Attainment Status

The Bay Area Air Basin is designated a non-attainment area for the federal O₃ and PM_{2.5} standards and for the state O₃, and PM₁₀ standards.^{14,15} The area has attained both NAAQS and CAAQS for CO, SO₂, and NO₂. As the regional air district, the Air District is responsible for attaining the NAAQS and CAAQS for these pollutants. As part of an effort to attain and maintain ambient air quality standards for O₃, PM₁₀, and PM_{2.5}, the Air District has established thresholds of significance for these air pollutants and their precursors that apply to both construction period and operational period impacts. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce O₃ levels. The highest O₃ levels in the Bay Area occur in the eastern and southern inland valleys where temperatures are higher, there is less wind circulation, and sources of the precursor pollutants (ROG and NO_x) are prominent. In the Bay Area, most particulate matter is generated from the following activities: combustion, factories, construction, grading, demolition, agriculture, and motor vehicles. Elevated concentrations of PM₁₀ and PM_{2.5} are the result of both region-wide emissions and localized emissions.

Sensitive Receptors

There are single-family residences surrounding the Preserve where the Halsey House is located. The nearest residence is approximately 140 feet southwest of the Halsey House.

¹⁴ Bay Area Air Quality Management District. "Air Quality Standards and Attainment Status." Last Updated December 15, 2025. Accessed December 19, 2025. <https://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status>.

¹⁵ The area has attained both state and federal ambient air quality standards for CO. The project does not include substantial new emissions of SO₂ or lead. These criteria pollutants are not discussed further.

4.3.2 Impact Discussion

For the purpose of determining the significance of the project's impact on air quality, would the project:

- 1) Conflict with or obstruct implementation of the applicable air quality plan?
- 2) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
- 3) Expose sensitive receptors to substantial pollutant concentrations?
- 4) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Note: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the determinations.

4.3.2.1 *Thresholds of Significance*

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for judgment on the part of the lead agency and must be based to the extent possible on scientific and factual data. The City of Los Altos has considered the air quality thresholds updated by the Air District in April 2023 and regards these thresholds to be based on the best information available for the Bay Area Air Basin and conservative in terms of the assessment of health effects associated with TACs and PM_{2.5}. The Air District CEQA Air Quality thresholds for criteria air pollutants and fugitive dust used in this analysis are identified in Table 4.3-2. Table 4.3-3 below lists the Air District health risk and hazards thresholds for single-source and cumulative sources.

Table 4.3-2: Bay Area Air District Air Quality Significance Thresholds

Criteria Air Pollutant	Construction Thresholds*	Operation Thresholds	Operation Thresholds
	Average Daily Emissions (pounds/day)	Average Daily Emissions (pounds/day)	Annual Average Emissions (tons/year)
ROG and NO _x	54	54	10
PM ₁₀	82 (exhaust)	82	15
PM _{2.5}	54 (exhaust)	54	10
CO	Not Applicable	9.0 ppm (eight-hour) or 20.0 ppm (one-hour)	
Fugitive Dust	Dust Control Measures/Best Management Practices	Not Applicable	

Notes: ROG = reactive organic gases; NO_x = oxides of nitrogen; PM₁₀ = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; PM_{2.5} = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; CO = carbon monoxide

* The Air District recommends that for construction projects that require less than one year to complete, lead agencies should annualize impacts over the scope of actual days that peak impacts would occur rather than over the full year. Additionally, for phased projects that results in concurrent construction and operational emissions. Construction-related exhaust emissions should be combined with operational emissions for all phases where construction and operations overlap.

Source: Bay Area Air District. *2022 California Environmental Quality Act Air Quality Guidelines*. April 2023. Pages 3-5 and 3-6.

Table 4.3-3: Bay Area Air District Health Risks and Hazards Thresholds

Health Risk	Single Source	Combined Cumulative Sources
Cancer Risk	10 per one million	100 per one million
Non-Cancer Hazard Index	1.0	10.0
Annual PM _{2.5} Concentration	0.3 µg/m ³	0.8 µg/m ³ (average)

Notes: µg/m³ = micrograms per cubic meter; PM_{2.5} = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less

Thresholds are applicable to construction and operational activities.

Source: Bay Area Air District. *2022 California Environmental Quality Act Air Quality Guidelines*. April 2023. Pages 3-5 and 3-6.

4.3.2.2 *Project Impacts*

-
- a) Would the project conflict with or obstruct implementation of the applicable air quality plan?
-

2017 Clean Air Plan

As described in Section 4.3.1.2 Regulatory Framework, the most current air quality plan from the Air District is the 2017 CAP. The Air District Air Quality Guidelines state that a determination of consistency with the 2017 CAP should demonstrate that the project supports the primary goals of the 2017 CAP, includes applicable control measures from the 2017 CAP, and does not disrupt or hinder implementation of any 2017 CAP control measures.

The project would not disrupt or hinder the 2017 CAP control measures for stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, and water because no new buildings are proposed post-demolition activities. During demolition, the project would generate temporary construction criteria air pollutant emissions due to use of diesel construction equipment and trucks. As described in further detail below, the project would not exceed the Air District significance thresholds for criteria air pollutant emissions (refer to Table 4.3-4); therefore, the project would not hinder the 2017 CAP's goal of attaining the NAAQS and CAAQS. **(Less than Significant Impact)**

Demolition Criteria Air Pollutant Emissions

CalEEMod Version 2022.1.0 was used to estimate emissions from demolition activity and demolition vehicle trips. The model provides emission estimates for both on-site and off-site construction activities. On-site activities primarily consist of construction equipment operation, while off-site activity includes worker, hauling, and vendor traffic.

A three-month demolition period was entered into CalEEMod, assuming demolition would be active five days per week. The model default construction equipment and emission standards for a project of this size (approximately 0.3 acres) were used with the addition of one excavator (conservatively assumed to operate for eight hours per day). Refer to Appendix B for details about the CalEEMod construction inputs and model output.

Average daily emissions were calculated for demolition by dividing the annual construction emissions by the number of active construction workdays that year. Table 4.3-4 shows the average daily demolition emissions of ROG, NOX, PM₁₀ exhaust, and PM_{2.5} exhaust.

Table 4.3-4: Average Daily Emissions Demolition Criteria Pollutant Emissions

Year	ROG	NO_x	PM₁₀ Exhaust	PM_{2.5} Exhaust
2025 Annual Emissions (tons per year)	0.02	0.17	0.01	0.01
2025 Average Daily Emissions (pounds per day)	0.63	5.31	0.31	0.31
Significance Threshold (pounds per day)	54	54	82	54
<i>Significant?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Note: Average daily emissions are calculated by dividing the construction emissions by the number of construction workdays. A total of 64 construction workdays were assumed. A rate of 2,000 pounds per ton was used to convert annual emissions.

Source: Appendix B

As shown in Table 4.3-4, predicted average daily project demolition emissions would not exceed the Air District significance thresholds. Therefore, project demolition would have a less than significant criteria pollutant emissions impact and would not conflict with or obstruct implementation of the 2017 Clean Air Plan. **(Less than Significant Impact)**

Operational Criteria Pollutant Emissions

The project consists of the demolition of the Halsey House and would not include the construction and operation of a new building. The project site would be undeveloped post-demolition. Therefore, the project would not generate any operational criteria pollutant emissions. **(No Impact)**

As described above, the project would not conflict with or obstruct implementation of the applicable air quality plan. The demolition proposed would not hinder the goals of the 2017 Clean Air Plan, and project criteria air pollutant emissions (including both construction and operation emissions) would not exceed Air District significance thresholds. Therefore, impacts would be less than significant. **(Less than Significant Impact)**

-
- b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
-

The Bay Area is designated a non-attainment area for the federal O₃ and PM_{2.5} standards and for the State O₃, PM₁₀, and PM_{2.5} standards. As described in the Air District CEQA Air Quality Guidelines, air pollution by its nature is largely a cumulative impact. No single project is sufficient in size, by itself, to result in non-attainment of ambient air quality standards. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

While the project would temporarily increase criteria pollutants in the Bay Area due to demolition activities, which would contribute to existing violations of O₃ and particulate matter standards, the

project would not result in any air pollutant emissions that would exceed the Air District's significance thresholds (see discussion under checklist question a) above). As a result, the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment. **(Less than Significant Impact)**

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Criteria Air Pollutants

In a 2018 decision (*Sierra Club v. County of Fresno*), the state Supreme Court determined CEQA requires that when a project's criteria air pollutant emissions would exceed applicable thresholds and have a cumulatively considerable contribution to a significant cumulative regional criteria pollutant impact, the potential for the project's emissions to affect human health in the air basin must be disclosed. State and federal ambient air quality standards are health-based standards, and exceedances of those standards result in continued unhealthy levels of air pollutants. In developing thresholds of significance for air pollutants, the Air District considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project has a less than significant impact for criteria pollutants, it is assumed to have no adverse health effect.

As described under checklist question a), the project would generate construction criteria air pollutant emissions below the Air District significance thresholds and no operational air pollutant emissions would be generated. Therefore, the project would not expose sensitive receptors to substantial criteria air pollutant concentrations that would result in adverse health effects.

Fugitive Dust

Construction demolition activities associated with the project would temporarily generate fugitive dust in the form of PM₁₀ and PM_{2.5}. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site could deposit mud on local streets, which could be an additional source of airborne dust after it dries. The Air District CEQA Air Quality Guidelines consider these impacts to be less than significant if best management practices (BMPs) are implemented to reduce the emissions. The project would be required to implement the following Standard Conditions of Approval that incorporate the Air District's BMPs to reduce fugitive dust impacts.

Standard Condition of Approval: Basic Air Quality Construction Measures: All construction contractors shall implement the basic construction BMPs recommended by the Bay Area Air District (Air District) to reduce fugitive dust emissions. Emission reductions BMPs will include the following measures:

- All exposed surfaces (e.g., staging areas, soil piles, and graded areas) 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 trackout 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 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 five minutes. Clear signage shall be provided for construction workers at all access points.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- 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.
- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
- Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.

The BMPs listed above shall be printed on all construction documents, contracts, and project plans. The City and/or contractor shall submit the construction documents, contracts, and project plans to the Development Services Director or the Director's designee for review and approval prior to the issuance of a demolition or grading permit, whichever occurs earliest.

Implementation of the Standard Condition of Approval above would minimize and reduce fugitive dust emissions to less than significant levels. **(Less than Significant Impact)**

Toxic Air Contaminants

Construction

Construction equipment and associated heavy-duty truck traffic emits DPM, which is a known TAC. Demolition of the Halsey House would take approximately three months, but construction equipment and trucks would not be operating continuously during the entire three-month period. There would be periods of no activity where no DPM would be emitted. Due to the short duration of construction, the limited use of heavy equipment, and the small project footprint, emissions of pollutants during construction would be minimal and below relevant Air District thresholds. Therefore, the project would not result in significant TAC impacts during construction. **(Less than Significant Impact)**

Operation

There would be no sources of operational TAC post-demolition as the area would be undeveloped and landscaped with vegetation. Therefore, the project would not result in TAC impacts during operation. **(No Impact)**

Based on the above discussion, impacts to sensitive receptors would be less than significant. **(Less than Significant Impact)**

-
- d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?
-

According to the Air District CEQA Guidelines, an odor source with five or more confirmed complaints per year averaged over three years is considered to have a significant impact. Demolition of the Halsey House would generate localized emissions of diesel exhaust from the use of heavy-duty equipment and vehicles and when equipment is idling. The odors from these emissions may be noticeable from time to time by nearby receptors; however, these odors would be intermittent and would disperse with distance. All demolition-related odors would cease upon completion of demolition. The project would not site any potential sources of odor post-demolition (such as landfills, food manufacturing, composting facilities, or chemical plants) that would result in complaints from surrounding uses. Therefore, the proposed demolition activities would not result in odor emissions that would adversely affect a substantial number of people. **(Less than Significant Impact)**

4.3.2.3 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a significant cumulative air quality impact?

The geographic area for cumulative air quality impacts is the Bay Area Air Basin. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. In developing thresholds of significance for air pollution, the Air District considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's air quality conditions.

Implementation of the 2017 Clean Air Plan

As described above under checklist question a), the project would be consistent with the 2017 CAP. The project, therefore, would not result in a cumulatively considerable impact to the implementation of the 2017 CAP. **(Less than Significant Cumulative Impact)**

Increase in Criteria Pollutants

As discussed under checklist questions a) and b), the construction and operational emissions generated by the project would not exceed the Air District thresholds for criteria air pollutant emissions. Therefore, the project would not result in a cumulatively considerable contribution to criteria pollutant emissions. **(Less than Significant Cumulative Impact)**

Exposure Sensitive Receptors to Substantial Pollutant Concentrations

The geographic area for cumulative impacts to sensitive receptors is 1,000 feet from the project site. The Library Courtyard project is over a half mile away and is outside of the geographic area for this impact. The Adobe Sewer Main Replacement project was adopted in 2020 and estimated to be completed in 2029. The project would potentially overlap with the proposed demolition. As discussed under checklist question c), the project would not expose sensitive receptors to substantial criteria air pollutant emissions and fugitive dust emissions would be reduced with incorporation of City Standard Conditions of Approval. The Adobe Sewer Main Replacement project would also be required to implement fugitive dust control measures.

A screening level cumulative community health risk assessment was prepared and considered all substantial sources of TACs (such as permitted stationary sources and/or roadways with average daily trips exceeding 10,000 vehicles) that could affect sensitive receptors located within 1,000 feet of the project site. No permitted stationary sources and no roadways with average daily trips exceeding 10,000 vehicles are within 1,000 feet.¹⁶ Based on the lack of cumulative community risk sources within 1,000 feet of the project site and the temporary health risk impacts the project would generate during demolition, the project would not expose sensitive receptors to substantial pollutant concentrations from cumulative sources of TAC. **(Less than Significant Cumulative Impact)**

Odors

On its own, demolition activities would not result in other emissions, such as odors, that would adversely affect a substantial number of people. As mentioned above, the Adobe Sewer Main Replacement project would potentially overlap with the demolition proposed. Due to the fact that construction odors are both localized and temporary, the cumulative odor impact from the construction of the project and the nearest cumulative project would be less than significant. **(Less than Significant Cumulative Impact)**

Overall, as discussed above, the project would have less than significant cumulative air quality impacts. **(Less than Significant Cumulative Impact)**

¹⁶ Bay Area Air District. "Permitted Stationary Sources Screening Report." Accessed December 19, 2025. Available at <https://baaqmd.maps.arcgis.com/apps/webappviewer/index.html?id=845658c19eae4594b9f4b805fb9d89a3>.

4.4 Biological Resources

The following discussion is based, in part, on a Biological Resources Report prepared by H.T. Harvey & Associates in August 2024. The report is attached to this EIR as Appendix C.

4.4.1 Environmental Setting

4.4.1.1 *Regulatory Framework*

Federal and State

Endangered Species Act

Individual plant and animal species listed as rare, threatened, or endangered under state and federal Endangered Species Acts are considered special-status species. Federal and state endangered species legislation has provided the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) with a mechanism for conserving and protecting plant and animal species of limited distribution and/or low or declining populations. Permits may be required from both the USFWS and CDFW if activities associated with a proposed project would result in the take of a species listed as threatened or endangered. To “take” a listed species, as defined by the State of California, is “to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill” these species. Take is more broadly defined by the federal Endangered Species Act to include harm of a listed species.

In addition to species listed under state and federal Endangered Species Acts, Sections 15380(b) and (c) of the CEQA Guidelines provide that all potential rare or sensitive species, or habitats capable of supporting rare species, must be considered as part of the environmental review process. These may include plant species listed by the California Native Plant Society and CDFW-listed Species of Special Concern.

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits killing, capture, possession, or trade of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. Hunting and poaching are also prohibited. This includes direct and indirect acts, except for harassment and habitat modification, which are not included unless they result in direct loss of birds, nests, or eggs. The CDFW also protects migratory and nesting birds under California Fish and Game Code Sections 3503, 3503.5, and 3800. The CDFW defines taking as causing abandonment and/or loss of reproductive efforts through disturbance.

Sensitive Habitat Regulations

Wetland and riparian habitats are considered sensitive habitats under CEQA. They are also afforded protection under applicable federal, state, and local regulations, and are generally subject to regulation by the United States Army Corps of Engineers (USACE), Regional Water Quality Control

Board (RWQCB), CDFW, and/or the USFWS under provisions of the federal Clean Water Act (e.g., Sections 303, 304, 404) and State of California Porter-Cologne Water Quality Control Act.

Fish and Game Code Section 1602

Streambeds and banks, as well as associated riparian habitat, are regulated by the CDFW per Section 1602 of the Fish and Game Code. Work within the bed or banks of a stream or the adjacent riparian habitat requires a Streambed Alteration Agreement from the CDFW.

Local

Los Altos General Plan

The following policies in the City's General Plan have been adopted for the purpose of reducing or avoiding impacts related to biological resources and are applicable to the project.

Policy	Description
CDHR 1.1	Preserve trees, especially heritage and landmark trees that protect privacy in residential neighborhoods.
OSCC 2.3	Protect creeks, creekside areas and riparian habitat in their natural state while ensuring public safety and preserving a valuable natural resource.
OSCC 2.5	Enforce local, state, and federal regulations addressing water quality and stormwater quality management.
OSCC 4.1	Provide adequate level of maintenance for City parks, open space, and public property to ensure safety, aesthetics, and recreational enjoyment for Los Altos residents.

Los Altos Municipal Code

The LAMC contains provisions and laws adopted by the City Council to maintain a healthy and safe community and to preserve the quality of life in Los Altos. Chapter 11.08 of the LAMC is the City's Tree Protection Ordinance, which prescribes measures for removal and replacement of trees in the City, and protective actions to be taken to avoid damage to existing trees. The Tree Protection Ordinance defines a "protected tree" as:

- Any tree that is 38 inches in circumference (12 inches in diameter measured at 48 inches above grade;
- Any tree of a native species that is 10 inches in diameter or greater measured at 48 inches above grade;
- 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;¹⁷ or

¹⁷ Trees may be designated as "heritage trees" upon application by the owner of the property on which the tree is located, a study of the proposed tree by the Historical Commission, and a determination of designation based on the criteria outlined in Section 11.08.060 of the Municipal Code.

- Any tree which was required by the City to be either saved or planted in conjunction with a development review application.

All protected trees require a Tree Removal Permit before they can be removed based on the criteria described in LAMC Subsection 11.08.100.

Chapter 6.32 of the LAMC outlines the City's watercourse protection regulations which detail required protection measures for waterways in the City, establish setbacks for development near Adobe Creek, and list permitted and prohibited activities within the setback areas adjacent to Adobe Creek.

4.4.1.2 *Existing Conditions*

As discussed in Section 3.0 Project Information and Description, the project site is located within the six-acre Preserve which is surrounded by single-family residences. The project site currently contains the Halsey House building that was originally used as a private residence but was subsequently converted to a nature center until it was vacated in 2008. It has remained vacant since 2008 and is no longer in use by staff or visitors. The area surrounding the structure contains seating areas, pathways, an ornamental garden, and an equipment shed. The remainder of the site consists of wooded areas that are dominated primarily by redwood trees and coast live oaks, interspersed with several other tree species including native California bay, California buckeye, and valley oak as well as some non-native tree species. Adobe Creek, which is an intermittent stream, is located approximately 50 feet northeast of the project site. The riparian habitat associated with Adobe Creek does not extend on to the project site.

Special-Status Species

Special-Status Plant Species

There are 89 special-status plant species that could potentially occur in the project region; however, 85 of those 89 species were determined to be absent from the project site for at least one of the following reasons: (1) absence of suitable habitat types, (2) lack of specific microhabitat or soil requirements, (3) the elevation range of the species is outside of the range of the project site, and/or (4) the project site is outside the species' known geographic range and/or there are no nearby existing records.

Suitable habitat, soil conditions, and elevation range are present on the project site for four remaining special-status plant species. These species include Dudley's lousewort, bent-flowered fiddleneck, California bottlebrush, and arcuate bush-mallow. To confirm whether these four species are present on-site, a focused survey was completed on May 7, 2024 during the blooming season for all four species. This survey determined that all four species are absent from the project site. Because no special-status plant species were detected during appropriately timed, focused surveys, special-status plants are determined to be absent from the project site.

Special-Status Animal Species

The coast live oak trees on the project site provide suitable roosting habitat for common bat species such as the Yuma myotis, California myotis, and big brown bat, and for three California species of special concern: the western red bat, Townsend's big-eared bat, and pallid bat.

During a survey on May 7, 2024, a Townsend's big-eared bat was observed roosting in the structure on-site. To further evaluate the presence of these bats, a follow-up dusk emergence survey was completed on-site on May 16, 2024. This survey utilized an acoustic detector which recorded bat calls both outside and inside the structure. Two California myotis and one Townsend's big-eared bat were recorded flying overhead. Further, an acoustic detector was also left inside the Halsey House building for five nights. Based on an analysis of the recorded calls, it was determined that the Townsend's big-eared bats using the building are most likely a non-maternity roost of a small number of individuals since the calls were only recorded in the late evening and early morning, when the bats exited and returned to the roost, as opposed to numerous call detections throughout the night, which is typical when adults are feeding young. Therefore, this roost likely consists of one or a few individual male bats, which is typical of this species.

Biologists conducting the May 7, 2024 survey also observed four active nests being utilized by the San Francisco dusky-footed woodrat, which is a California special species of concern. Suitable habitat areas for this species are located throughout the project site.

The California giant salamander (a California species of special concern), Vaux's swift (a California species of special concern while nesting), yellow warbler (a California species of special concern), and white-tailed kite (a California fully protected species) could be present as foragers based on the suitable site conditions and habitat; however, none were noted during the survey on-site.

Other species including the mountain lion (a candidate for listing under the California Endangered Species Act, monarch butterfly (a candidate for listing under the Federal Endangered Species Act, western red bat, and pallid bat (both are California species of special concern) may also forage on the project site. The focused surveys did not determine suitable locations or detect the species. Therefore, these species are not expected to den, roost, or breed on or immediately adjacent to the project site. The olive-sided flycatcher (a California species of special concern only when nesting) may occasionally occur on or over the project site as nonbreeding transients, foragers, or migrants, but no suitable nesting habitat for this species occurs on the project site. No aquatic habitats capable of supporting special-status fish species are present on the project site; however, Adobe Creek could potentially support the southern coastal roach and riffle sculpin which are California species of special concern.

Sensitive Natural Communities and Vegetation Alliances

The CDFW categorizes and ranks natural communities of vegetation based on the condition (rarity and endangerment) of a habitat throughout California. There are no sensitive natural communities or sensitive vegetation alliances present on-site.

Riparian Habitat and Waters of the State/United States

As noted above, Adobe Creek is approximately 50 feet northeast of the project site. Riparian habitat associated with Adobe Creek does not extend onto the project site, and no wetlands or other waters of the United States/California occur on the project site.

4.4.2 Impact Discussion

For the purpose of determining the significance of the project's impact on biological resources, would the project:

- 1) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS)?
- 2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS?
- 3) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- 4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- 5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- 6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

4.4.2.1 Project Impacts

-
- a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?
-

Special-Status Plant Species

The project's demolition activities would result in the disturbance of approximately 15,000 square feet (or 0.3 acres) on the project site, which would include the footprint of the existing structure and vegetated areas containing trees and shrubs immediately adjacent to the building. As discussed in Section 4.4.1.2 Existing Conditions above, there are no special-status plant species present on-site. There are a variety of regionally common habitats and associated plant species that would be

disturbed; however, these habitats do not provide regionally rare or especially high-value habitat for native vegetation, wildlife, or special-status species. Following the demolition of the structure on-site and removal of the demolished materials, the site would be replanted with native vegetation, which would provide some habitat value. Therefore, impacts to special-status plant species would be less than significant. **(Less than Significant Impact)**

Special-Status Animal Species

As discussed in Section 4.4.1.2 Existing Conditions above, several special-status animal species have been identified on-site, and the site has habitat areas that could potentially be utilized by additional special-status animal species for shelter, travelling, foraging, and/or breeding.

Special-Status Aquatic Species

The project would not include any direct impacts to Adobe Creek or the surrounding riparian habitat; however, indirect impacts on water quality in the creek could potentially occur as a result of demolition activities. These activities could potentially impact the southern coastal roach and riffle sculpin in Adobe Creek due to a temporary increase in erosion, sedimentation, and turbidity in aquatic habitats located downstream of the work area. As discussed in further detail in Section 4.10 Hydrology and Water Quality, the project would implement Standard Conditions of Approval during demolition activities which would include BMPs to control erosion of exposed soil surfaces, which would prevent the discharge of stormwater pollutants into Adobe Creek. Additionally, the project would comply with the City's permanent stormwater control measures (LAMC Section 10.16). With implementation of these BMPs, potential impacts to aquatic species adjacent to the site would be reduced to a less than significant level.

In addition, there is a low potential for individual California giant salamander to be present on-site due to the proximity of Adobe Creek. Although demolition activities could result in direct impacts to individuals who are foraging or traveling on-site, this would likely only impact one or two individuals, which would represent a very small proportion of the regional population. Therefore, this impact would be less than significant. **(Less than Significant Impact)**

Non-breeding Special-Status Invertebrates, Birds, and Mammals

As discussed in Section 4.4.1.2 Existing Conditions, the monarch butterfly, olive-sided flycatcher, mountain lion, and western red bat may occur on the project site as non-breeding migrants, transients, or foragers. Construction activities might result in a temporary direct impact through the alteration of foraging patterns (e.g., avoidance of work sites because of increased noise) but they would not result in the loss of individuals, as individuals of these species would move away from any construction areas or equipment before they could be injured or killed. In addition, the project site does not provide foraging habitat for large numbers of individuals of these species; therefore, impacts resulting from the project would be less than significant. **(Less than Significant Impact)**

Special-Status Bird Species

Three special-status bird species have the potential to nest on or adjacent to the site. The white-tailed kite could nest in oak woodland habitat or landscape trees on and adjacent to the project site. The Vaux's swift could nest in the existing structure's chimney or in hollow snags in surrounding areas. The yellow warbler could nest adjacent to the project site in riparian trees along Adobe Creek. Demolition activities associated with the project would not result in the permanent loss of suitable nesting habitat for the yellow warbler, as no activities are proposed within the adjacent riparian habitat along Adobe Creek. However, the project would result in the permanent loss of suitable nesting and foraging habitat for the white-tailed kite and Vaux's swift, as well as suitable foraging habitat for the yellow warbler.

Based on site observations, the amount of suitable habitat areas within and adjacent to the site, and known nesting densities of these species, it is unlikely that more than one or two pairs of these species would inhabit the project area at the same time. This would represent a very small fraction of the regional population of these species. Therefore, any potential impacts from the project would not constitute a significant impact on these species or their habitat. To protect individuals of these species and any other nesting birds or raptors that may utilize habitat on-site, the project would implement the following Standard Conditions of Approval.

Standard Conditions of Approval: Preconstruction Nesting Bird Survey: To the extent practicable, vegetation removal and construction activities shall be performed from September 1 through January 31 to avoid the general nesting period for birds. If construction or vegetation removal cannot be performed during this period, preconstruction surveys will be performed no more than two days prior to construction activities to locate any active nests as follows:

- The applicant shall be responsible for the retention of a qualified biologist to conduct a survey of the project site and surrounding 500 feet for active nests – with particular emphasis on nests of migratory birds – if construction (including site preparation) will begin during the bird nesting season, from February 1 through August 31.
- If active nests are observed on either the project site or the surrounding area, the applicant, in coordination with the appropriate City staff, shall establish no-disturbance buffer zones around the nests, with the size to be determined in consultation with the California Department of Fish and Wildlife (CDFW) (usually 100 feet for perching birds and 300 feet for raptors). The no-disturbance buffer will remain in place until the biologist determines the nest is no longer active or the nesting season ends. If construction ceases for two days or more and then resumes during the nesting season, an additional survey will be necessary to avoid impacts on active bird nests that may be present.

Implementation of the Standard Conditions of Approval above would ensure that either project activities would take place outside of the nesting season, or that pre-construction surveys are completed and appropriate buffers are established, to reduce any impacts to nesting birds and raptors on or near the project site to a less than significant level. **(Less than Significant Impact)**

San Francisco Dusky-Footed Woodrat

As discussed in Section 4.4.1.2 Existing Conditions, four nests of San Francisco dusky-footed woodrats were observed in the coast live oak woodland habitat on-site. Woodrats from this community would also likely forage in the oak woodland habitats throughout the site. Vegetation clearing and operation of equipment during demolition activities could result in the injury or mortality of individual woodrats and the disturbance or destruction of nests which could lead to increased predation risk for these individuals. Although woodrats are abundant in the surrounding region, impacts to these woodrat nests would be a significant impact due to their ecological importance as a prey source for other predatory species.

Impact BIO-1: Disturbance of the existing woodrat nests on-site could result in the destruction of nests and injury or mortality of individual woodrats.

Mitigation Measures:

MM BIO-1.1: **Pre-Activity Survey.** A qualified biologist shall conduct a pre-activity survey for San Francisco dusky-footed woodrat nests within 30 days of the start of work activities. If active woodrat nests are determined to be present in, or within 10 feet of, the impact areas, MM BIO-1.2 and MM BIO-1.3 below shall be implemented, as appropriate.

MM BIO-1.2: **Avoidance Buffers.** Active woodrat nests that are detected in, or within 10 feet of, the impact areas shall be avoided. A minimum 10-foot buffer shall be maintained between project activities and woodrat nests to avoid disturbance. In some situations, a smaller buffer may be allowed if, in the opinion of a qualified biologist, nest relocation (MM BIO-1.3 below) would represent a greater disturbance to the woodrats than the adjacent work activities.

MM BIO-1.3: **Nest Relocation.** If avoidance of active woodrat nests within and immediately adjacent to the work impact is not feasible (e.g., because it would preclude implementation of the project), then nest materials shall be relocated to suitable habitat as close to the project area as possible, as determined and implemented by a qualified biologist (ideally, within or immediately adjacent to the project site). Relocation efforts shall avoid the peak nesting season (February to July).

Prior to the start of work activities, a qualified biologist shall disturb the woodrat nest to the degree that all woodrats leave the nest and seek refuge outside of the impact area. Disturbance of the woodrat nest shall be initiated no earlier than one hour before dusk to prevent the exposure of woodrats to diurnal predators. Subsequently, the biologist shall dismantle and relocate the nest material by hand. During the deconstruction process, the biologist shall assess if there are juveniles in the nest. If immobile juveniles are observed, the

dismantling process shall be discontinued until a time when the biologist believes the juveniles will be capable of independent survival (typically after two to three weeks). A no-disturbance buffer shall be established around the nest until the juveniles are mobile. The nest may be dismantled once the biologist has determined that adverse impacts on the juveniles would not occur.

With implementation of mitigation measures MM BIO-1.1 through BIO-1.3 above, impacts of the project on the San Francisco dusky-footed woodrat would be reduced to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

Common and Special-Status Roosting Bats

As discussed in Section 4.4.1.2 Existing Conditions, one or several Townsend's big-eared bats are roosting in the structure on-site. In addition, the large coast live oak trees on the project site provide suitable roosting habitat for the western red bat, pallid bat, and common bat species, such as the Yuma myotis, California myotis, and big brown bat. Although the trees on the site provide suitable roosting habitat, no evidence of a colony of roosting bats was detected in trees on-site during the May 7, 2024 survey, indicating that bats are not roosting in these trees currently, and no maternity colony is present. However, the proposed demolition of the structure on-site could result in direct impacts to the Townsend's big-eared bats, as individuals could be physically injured or killed, subjected to physiological stress, or face increased predation because of exposure during daylight. Direct impacts to the Townsend's big-eared bats would be considered significant.

Impact BIO-2: Demolition of the structure on-site would disturb Townsend's big-eared bats roosting within the structure.

Mitigation Measures:

MM BIO-2.1: Bat Exclusion from Halsey House. Prior to the start of any project-related activities on the exterior or interior of the Halsey House building, a qualified bat biologist shall guide and supervise the installation of appropriate exclusion devices to allow any roosting Townsend's big-eared bats (and other bat species, if present) to vacate the roost and prevent bats from reoccupying these features before construction activities are initiated. Bird exclusion netting shall not be used because bats may become entangled in it, potentially leading to mortality. Exclusion materials shall be inspected by a qualified biologist once per month between their installation and initiation of building demolition, to ensure that the materials are in good working order. If exclusion materials become compromised, the City shall perform maintenance on these devices, as directed by the qualified biologist.

With implementation of mitigation measure MM BIO-2.1, the project would reduce potential impacts to the Townsend's big-eared bat to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

Based on this discussion, implementation of mitigation measures MM BIO-1.1 through BIO-1.3, and MM BIO-2.1 would reduce project impacts to special-status animal species to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

- b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?
-

As discussed in Section 4.4.1.2 Existing Conditions, there are no sensitive natural communities or sensitive vegetation alliances present on-site. Adobe Creek and its associated riparian habitat is adjacent to the project site; however, there is no riparian habitat on-site and there would not be any direct impacts to riparian habitat resulting from the project. As discussed under checklist question a) above, demolition activities on-site could result in indirect impacts to Adobe Creek and the associated riparian habitat if these activities generate contaminated stormwater runoff that drains into Adobe Creek. To reduce those potential indirect impacts, the project would implement Standard Conditions of Approval (as discussed in Section 4.3 Air Quality) during demolition activities and utilize BMPs to control erosion of exposed soil surfaces. Additionally, the project would comply with the City's permanent stormwater control standards (LAMC Section 10.16). Therefore, discharge of stormwater pollutants into Adobe Creek would be prevented, and potential impacts to the riparian habitat areas adjacent to the site would be reduced to a less than significant level. **(Less than Significant Impact)**

- c) Would the project have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means?
-

There are no wetland areas present on-site. As discussed under checklist questions a) and b) above, Adobe Creek is approximately 50 feet northeast of the project site, and there is some potential for indirect impacts to the creek that could occur if contaminated stormwater runoff drains to the creek. The project would implement Standard Conditions of Approval (as discussed in Section 4.3 Air Quality) during demolition activities and utilize BMPs to control erosion of exposed soil surfaces. With implementation of these Standard Conditions of Approval, potential impacts to wetland areas along Adobe Creek would be reduced to a less than significant level. **(Less than Significant Impact)**

- d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
-

There are no established native resident or migratory wildlife corridors on-site; however, Adobe Creek and the associated riparian corridor adjacent to the project site are utilized by various aquatic and terrestrial wildlife species as a movement corridor. Migrating songbirds also utilize the creek corridor during their migration. The project would not result in any loss of aquatic, wetland, or

riparian habitat along Adobe Creek or in any substantial reduction in the value of the Adobe Creek corridor for wildlife movement. In addition, the removal of the existing structure on-site could result in a net benefit to foraging or migrating individuals utilizing the creek corridor as there would be fewer physical barriers adjacent to the creek. Aquatic and terrestrial species would continue to be able to move north to south along Adobe Creek following completion of the project.

As discussed under checklist question a), the primary structure on-site is not currently utilized as a nursery site by the Townsend's big-eared bats roosting in the structure. The project would implement MM BIO-2.1 prior to demolition activities to prevent any common or special-status bat species from roosting in the building and/or establishing a maternity roost. In addition, Standard Conditions of Approval would be implemented to reduce potential impacts to nesting birds on-site. Based on this discussion, the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species, with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Therefore, the project would result in a less than significant impact with mitigation incorporated. **(Less than Significant Impact with Mitigation Incorporated)**

-
- e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
-

Los Altos Tree Protection Ordinance

Demolition activities on-site could potentially include the removal of two existing trees located directly adjacent to the structure, a small oak tree and a mature cypress tree, neither of which would be considered protected trees under the City's Tree Protection Ordinance. The project would comply with Section 11.08.120 of the LAMC requiring a one-to-one replacement ratio and tree replacement plan. In addition, the project would implement tree protection measures outlined in Section 11.08.140 of the LAMC which would include installing protective fencing around remaining trees, maintaining the existing grade out to the dripline of existing, adjacent trees, repairing trees that are damaged by project activities, and avoiding attachment of signs, wires, or other objects to existing trees. As a result, the proposed project would not conflict with the City's Tree Protection Ordinance. **(Less than Significant Impact)**

Los Altos Watercourse Protection Regulations

Per Section 6.32.040 of the LAMC, an 80-foot setback from the top of bank of Adobe Creek would be required based on the location and size of the project site. This buffer area is required to protect Adobe Creek, any associated riparian habitat, and species that may utilize the habitat and foraging space. The northern portion of the structure on-site and several walkways are currently within this established setback area. In addition, there are approximately 243 square feet of coast live oak woodland on-site that fall within the setback area. The project would demolish the Halsey House and may also require the pruning of existing trees to accommodate construction equipment. Some of these activities would occur within the established setback area.

Consistent Section 6.32.060 of the LAMC, an exception would be required to perform demolition activities (e.g., removal of vegetation, demolition, grading) within the setback area. The project would be required to obtain this exception prior to initiating demolition activities on-site; therefore, it would comply with the City's Watercourse Protection Regulations. In addition, the removal of all structures and existing improvements on-site would result in a minor improvement to the area within the 80-foot setback as there would no longer be physical barriers for wildlife on-site and the area that previously contained built structures would return to a ruderal habitat that would provide some habitat value (e.g., foraging habitat) for animals associated with the creek corridor. Based on this discussion, the proposed project would not conflict with the City's Watercourse Protection Regulations. **(Less than Significant Impact)**

-
- f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?
-

The City of Los Altos has not established a habitat conservation plan or a natural community conservation plan, nor is it located within the boundaries of an approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with an adopted local, regional, or state habitat conservation plan. **(No Impact)**

4.4.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a significant cumulative biological resources impact?

The geographic area for cumulative impacts to biological resources includes the project site and surrounding area because it is assumed any impacts on-site would affect similar biological resources in the surrounding area. The cumulative impact on biological resources resulting from the project in combination with other cumulative projects in the vicinity would be dependent on the relative magnitude of adverse effects of these projects on biological resources compared to the relative benefit of impact avoidance and minimization efforts prescribed by planning documents, CEQA mitigation measures, and permit requirements for each project. Any cumulative projects in the vicinity would undergo separate environmental review and implement appropriate measures to reduce impacts to biological resources to a less than significant level.

The project would not have a significant impact on biological resources as it would implement the mitigation measures described in checklist questions a) through f) above to reduce potential impacts. With implementation of these measures, the project would avoid or reduce impacts to biological resources. Any impacts would be made to a small fraction of regional populations of the affected species. Therefore, the project would not result in a cumulatively considerable contribution to a significant cumulative biological resources impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

4.5 Cultural Resources

The following discussion is based, in part, on a Historic Resources Evaluation prepared by Page & Turnbull in July 2021. The report is attached to this EIR as Appendix D.

4.5.1 Environmental Setting

4.5.1.1 *Regulatory Framework*

Federal and State

National Historic Preservation Act

Federal protection is legislated by the National Historic Preservation Act of 1966 (NHPA) and the Archaeological Resource Protection Act of 1979. These laws maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP). Section 106 of the NHPA and related regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the primary federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed or eligible for listing in the NRHP. Impacts to properties listed in the NRHP must be evaluated under CEQA.

California Register of Historical Resources

The CRHR is administered by the State Office of Historic Preservation and encourages protection of resources of architectural, historical, archeological, and cultural significance. The CRHR identifies historic resources for state and local planning purposes and affords protections under CEQA. Under Public Resources Code Section 5024.1(c), a resource may be eligible for listing in the CRHR if it meets any of the NRHP criteria.¹⁸

Historical resources eligible for listing in the CRHR must meet the significance criteria described previously and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

The concept of integrity is essential to identifying the important physical characteristics of historical resources and, therefore, in evaluating adverse changes to them. Integrity is defined as “the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance.” The processes of determining integrity are similar for both the CRHR and NRHP and use the same seven variables or aspects to define integrity

¹⁸ California Office of Historic Preservation. “California Office of Historic Preservation Technical Assistance Series #6.” Accessed August December 19, 2025.
<https://ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf>.

that are used to evaluate a resource's eligibility for listing. These seven characteristics include 1) location, 2) design, 3) setting, 4) materials, 5) workmanship, 6) feeling, and 7) association.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The act requires that upon discovery of human remains, construction or excavation activity must cease and the county coroner be notified.

Public Resources Code Sections 5097 and 5097.98

Section 15064.5 of the CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on non-federal land. These procedures are outlined in Public Resources Code Sections 5097 and 5097.98. These codes protect such remains from disturbance, vandalism, and inadvertent destruction, establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establish the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding disposition of such remains.

Pursuant to Public Resources Code Section 5097.98, in the event of human remains discovery, no further disturbance is allowed until the county coroner has made the necessary findings regarding the origin and disposition of the remains. If the remains are of a Native American, the county coroner must notify the NAHC. The NAHC then notifies those persons most likely to be related to the Native American remains. The code section also stipulates the procedures that the descendants may follow for treating or disposing of the remains and associated grave goods.

Local

Los Altos General Plan

The following policies in the City's General Plan have been adopted for the purpose of reducing or avoiding impacts related to cultural resources and are applicable to the project.

Policy	Description
CDHR 6.1	Ensure that the integrity of historic structures and the parcels on which they are located are preserved through the implementation of applicable design, building, and fire codes.
CDHR 6.2	The City shall regard demolition of landmark and historic resources, listed in the Historic Resources Inventory as a last resort. Demolition would be permitted only after the City determines that the resource has lost its physical integrity, retains no reasonable economic use, that demolition is necessary to protect health, safety, and welfare, or that demolition is necessary to proceed with a new project where the benefits of the new project outweigh the loss of the historic resource.
CDHR 6.4	Preserve archaeological artifacts and sites found in Los Altos or mitigate disturbance to them, consistent with their intrinsic value.

Policy	Description
CDHR-6.5	Require an archaeological survey prior to the approval of significant development projects near creeksides or identified archaeological sites.

Los Altos Municipal Code

Chapter 12.44 of the LAMC establishes the criteria and processes for the designation of historic resources in the City, outlines the responsibilities of the City’s Historical Commission, and describes the permit requirements for proposed alterations to historic resources. The primary purposes of Chapter 12.44 are to ensure protection of irreplaceable historic resources, enhance visual character through architectural compatibility, and encourage appreciation of the City’s past. The criteria for local designation are:

1. Age. A structure or property should be more than 50 years in age.
2. Determination of Integrity. A structure or property should retain sufficient historic integrity in most of the following areas: design, setting, materials, workmanship, and feeling.
3. Historic Significance. A structure or property should be clearly associated with one or more of the following areas of significance: event, person/people, architecture/design, and archaeology.

Los Altos Historic Resources Inventory

The City maintains a Historic Resources Inventory (HRI) which contains historic landmark properties, historic resource properties, and designated heritage trees of local importance.¹⁹ There are two main types of protected structures in Los Altos: historic resources and historic landmarks. A historic resource is a property or structure that has been determined to be over 50 years old; retains its physical integrity; has historical, architectural, cultural, and/or aesthetic value; and is listed on the HRI. A historic landmark is a building, improvement, structure, natural feature, site, or area of land that has significant historical, architectural, cultural, and/or aesthetic interest or value, and is officially designated as a landmark by the City Council. Structures are deemed historic resources or landmarks through an evaluation of consistency with Chapter 12.44.

4.5.1.2 *Existing Conditions*

Archaeological Resources

Native Americans occupied Santa Clara Valley and the greater Bay Area for more than 5,000 years. The exact time period of the Ohlone (originally referred to as Costanoan) migration into the Bay Area is debated by scholars. Dates of the migration range from between 3,000 B.C. and 500 A.D. Regardless of the actual time frame of their initial occupation of the Bay Area and, in particular, Santa Clara Valley, it is known that the Ohlone had a well-established population of approximately 7,000 to 11,000 people with a territory that ranged from the San Francisco Peninsula and the East

¹⁹ City of Los Altos. “Historic Resources Inventory.” Accessed December 19, 2025.
<https://www.losaltosca.gov/535/Historic-Inventory>.

Bay, south through Santa Clara Valley and down to Monterey and San Juan Bautista. The Ohlone people were hunter/gatherers focused on hunting, fishing, and collecting seasonal plant and animal resources, including tidal and marine resources from San Francisco Bay. The customary way of living, or lifeway, of the Ohlone people disappeared by about 1810 due to disruption by introduced diseases, a declining birth rate, and the impact of the California mission system established by the Spanish in the area beginning in 1777.

A Sacred Lands File inventory request was submitted to the NAHC on March 1, 2024. The NAHC responded on March 5, 2024 with information that the Sacred Lands File search was negative for the presence of sacred sites. However, the negative Sacred Lands File results do not preclude the project area from having unknown subsurface cultural resources (including tribal cultural resources). Historically, the Ohlone and Muwekma Indian tribes have made their homes along creeks.²⁰ Adobe Creek is approximately 50 feet northeast of the Halsey House. Therefore, the project site may be sensitive for archaeological resources.

Historic Resources

The Halsey House is located on-site. The Spanish Colonial Revival style²¹ house was historically the single-family residence of Theodore Vail Halsey and Emma Wright Halsey from 1923 through 1945. Prior the construction of the Halsey House, the surrounding land, which now consists of the Preserve, was owned by the parents of Emma Wright Halsey, who bought the property in 1912 to construct a summer cottage to be used seasonally as a getaway from San Francisco. The land was gifted to Emma Wright Halsey when she wed Theodore Vail Halsey in 1915. The couple decided to make Los Altos their permanent residence in 1923, which led to the construction of the Halsey House. Additions were made to the residence in 1928 to provide an apartment for Emma Wright Halsey's mother, Myra Wright, and in the 1930s to add living quarters for a servant. During her occupancy of the Halsey House, Emma Wright Halsey with the help of Mori and Yoshio Hongo, her gardeners, changed the landscape of the property by planting redwoods, fruit trees (including apple, pear, apricot, cherry, almond, persimmon, and walnut trees), and flowering gardens. Other improvements to the property included several small wood bridges that crossed over Adobe Creek, the construction of benches, the lining of planting areas with stone borders, the construction of a croquet court, and the construction of other small buildings (e.g., caretaker's cottage, guest cottage, and garage).

From 1945 to 1970, the Halsey House was owned by Edward C. Bessey and Rachel M. S. Bessey (Bessey Family). While the Bessey Family owned the property, there are no records indicating the family lived in the Halsey House because their residences were identified in San José, Palo Alto,

²⁰ City of Los Altos. *Los Altos General Plan Initial Study/Mitigated Negative Declaration*. November 2002. Page 20.

²¹ The Halsey House illustrates some of the common features of the Spanish Colonial Revival style through its material palette of clay tile roofing, lightly colored stucco cladding, and multi-lite windows and doors with wood sash. The Halsey House also integrated interior and exterior spaces through the use of French doors and courtyards, which is an element of this particular style. Source: Page & Turnbull. *Halsey House Historic Resource Evaluation*. July 28, 2021. Pages 36 and 37.

Mountain View, Los Altos, and Los Altos Hills. Instead, the Halsey House was subdivided into two units and a range of six to ten cottages were constructed for rent.

In 1970, Meredith Pearson bought the six-acre property to save the area from development and establish a communal living space for family and friends. During her ownership the Halsey House and cottages constructed by the Bessey Family were occupied by friends and renters, respectively.

The City of Los Altos bought the six-acre property in 1974 to be a park, using the Halsey House as an educational center and small museum for the public until 2008 when it was closed. Since 2008, the Halsey House has been vacant.

National Register of Historic Places

The Halsey House is not currently listed on the NRHP.

California Register of Historical Resources Evaluation

The Halsey House is not currently listed on the CRHR. The residence was evaluated for eligibility for the CRHR.

In order for a property to be eligible for listing in the CRHR, it must be found significant under one or more of the following criteria.

- Criterion 1 (Events): Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- Criterion 2 (Persons): Resources that are associated with the lives of persons important to local, California, or national history.
- Criterion 3 (Design/Architecture): Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values.
- Criterion 4 (Information Potential): Resources or sites that have yielded or have the potential to yield information important to the prehistory or history of the local area, California, or the nation.

Criterion 1 (Events)

The Halsey House and Preserve are an example of the residential patterns of Los Altos. As mentioned above, the six-acre property was originally owned by the parents of Emma Wright Halsey as a summer retreat from San Francisco. Middle- to upper middle-class residents of San Francisco typically owned a second residential property in Los Altos and along the Peninsula to escape the fog and cooler weather of San Francisco during the summer. As businesses, schools, and public transit options (e.g., railway systems) became more common along the Peninsula, more families migrated out of San Francisco to establish homes in Los Altos and the surrounding area.

The Halsey family's decision to permanently reside at Halsey House in 1923 coincided with the boom of year-round residential properties being constructed in Los Altos along the University Avenue and Orange Avenue area. Unlike the other residential residences that were developed as freestanding single-family residences on small parcels facing the street, the Halsey House was constructed in a manner that complimented the rural setting of its location. Emma Wright Halsey, Mori, and Yoshio kept the rural setting of the area by planting redwoods, fruit trees, and gardens. While most of the landscaping done by Emma Wright Halsey and her gardeners no longer exists, their work helped establish the area known today as the Preserve and the area is still able to convey the historic setting of the Halsey House. Since both the residence and surrounding area made a significant contribution to the broad patterns of local and regional history of California, the Halsey House and the Preserve are individually eligible for the CRHR under Criterion 1 (Events).

Criterion 2 (Persons)

As mentioned above, the Halsey House was owned by Emma Wright Halsey and her husband Theodore Vail Halsey, the Bessey Family, and Meredith Pearson. While Theodore Vail Halsey had a successful career in the telephone industry, his personal achievements were not tied specifically to the Halsey House because no research indicates he used the home for professional reasons. While Emma Wright Halsey and her gardeners are tied to the development of Halsey House and the creation of what would be the Preserve, they themselves are not considered historically significant people. Their contributions do not rise to the level of importance where they, as individual persons, would be considered significant contributors to local, state, or national history. Emma Wright Halsey's, Mori's, and Yoshio's work on the Halsey House and surrounding area are better tied to CRHR Criterion 1. The Bessey Family and Meredith Pearson were individuals that owned the residence from 1945 and 1974. They are largely unknown individuals with no significant personal achievements tied to the Halsey House. For these reasons, the property is not eligible for listing on the CRHR under Criterion 2 (Persons).

Criterion 3 (Design/Architecture)

The Halsey House was constructed in 1923 and was designed by an unknown architect. The building was designed in a modest Spanish Colonial Revival style, demonstrated through its stucco cladding, hipped clay tile roof, low one-story massing arranged around a private courtyard with bench seating and a fountain, and extensive use of multi-lite windows and doors. Two additions were added in 1928 and in the early 1930s in the same existing style and design to match the original architecture of the Halsey House. While the Halsey House is an example of Spanish Colonial Revival Style, it does not have decorative plasterwork, tile, or exposed wood elements that are indicative of this style. It is neither a modest nor high-style example of Spanish Colonial Revival Style but a simple interpretation. The Halsey House is also not the only residence representative of this style in Los Altos or the greater Bay Area (Palo Alto, Mountain View, Hillsborough, and San José). It does not represent distinctive methods of construction or craftsmanship. As the architect or builder of the residence remains unidentified, the Halsey House is also not considered significant for its association with a master architect or builder. The landscaping of Halsey House is also not considered individually significant under Criterion 3 because the majority of the original landscaping

has been removed. Therefore, the Halsey House is not eligible for the CRHR under Criterion 3 (Design/Architecture).

Criterion 4 (Information Potential)

The “potential to yield information important to the prehistory or history of California” typically relates to archaeological resources rather than built resources. When Criterion 4 does relate to built resources, it is relevant for cases when the buildings themselves are the principal source of important construction-related information. The property is not eligible for the CRHR under Criterion 4 (Information Potential).

Aspects of Integrity

To qualify for listing in the CRHR, a property must possess significance under one or more of the above-listed criteria and have historic integrity. Historic integrity is based on location, design, setting, materials, workmanship, feeling, and association.

Location and Setting

The building retains integrity of location and setting since it has not been moved and the surrounding area has retained its wooded and natural setting. The redwood saplings that were planted by Emma Wright Halsey and Mori are now mature trees.

Design

The integrity of design has not been diminished since the Halsey House still retains its overall form, massing, and materials as a modest example of a 1920s Spanish Colonial Revival despite several alterations. While lacking the more ornate features of the style including decorative plasterwork, tile, and exposed wood elements, the building features a large number of multi-lite windows and French doors that illustrate the porous relationship between the interior and exterior spaces of the building. Also, the alterations to the massing and footprint of the building were undertaken during the ownership of the Halsey family and are considered historic. Overall, the original design of the building remains intact, and the materials, decoration, craftsmanship, and massing of the building have remained largely unchanged since 1945 with the exception of some replacement windows and doors. Therefore, the structure retains integrity of design.

Workmanship

The Halsey House retains its wood-frame building with stucco cladding and a clay tile hipped roof. The residence also retains the scored and tinted concrete patios and metal features throughout the building. These details convey the workmanship of the Halsey House. Therefore, the structure retains integrity of workmanship.

Feeling

The Halsey House is still within the Preserve and set within the wooded landscape around Adobe Creek. The feeling of a 1920s year-round home has not been diminished since the residence retains

a semi-rural feeling and the architecture has not been altered. Therefore, the residence retains integrity of feeling.

Association

The Halsey House is still significant for its residential and development history. The Preserve is evidence of the landscaping started by Emma Wright Halsey and Mori and Yoshio Hongo. The Halsey House still remains intact with its 1920s architectural characteristics and represents Emma Wright Halsey's period of residence. Therefore, the structure retains integrity of association.

Based on the above, the Halsey House and the Preserve retain all seven aspects of their integrity. Since the residence and the Preserve are individually eligible for listing on the CRHR under Criterion 1 for their contribution to the broad patterns of local history and retain their integrity, the structure is considered a historical resource under CEQA.

City of Los Altos Historic Resources Inventory

The residence and the Preserve have been designated as City Historic Landmarks since May 1981. The Historic Resources Evaluation (Appendix D) included an analysis of the Halsey House against the City's local criteria. For a property to be a historic resource on the City of Los Altos HRI, it must be over fifty years of age, retain its physical integrity, and have historical significance related to historic events, persons, architecture and design, or archaeological significance. These criteria reflect the NRHP and CRHR but prioritize the evaluation of a structure's integrity first in evaluation of its historic significance as opposed to evaluating integrity only after historic significance is determined as is the case under the NRHP and CRHR criteria. For listing as a Historic Landmark, the City requires that the resource is a rare or unique property type.

The Halsey House is over a century old and meets the age threshold as a historic resource. In addition, while the condition of the building is poor due to environmental damage and vandalism, the building retains over 50 percent of its original materials, form, and character-defining features, which is the threshold for physical integrity as established in the City's Historic Resource Inventory criteria. As described above, the Halsey House property has all seven aspects of integrity (location, design, setting, materials, workmanship, feeling, and association). The residence is also representative of residential development patterns in Los Altos and for the establishment of the Redwood Grove. For these reasons, the Halsey House property continues to meet the criteria for inclusion on the HRI and as a City Historic Landmark.

4.5.2 Impact Discussion

For the purpose of determining the significance of the project's impact on cultural resources, would the project:

- 1) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

- 2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?
- 3) Disturb any human remains, including those interred outside of dedicated cemeteries?

4.5.2.1 *Project Impacts*

-
- a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?
-

As discussed above in Section 4.5.1.2 Existing Conditions, the Halsey House is on the HRI and was determined to be eligible for listing on the CRHR under Criterion 1 as an example of residential development patterns in Los Altos and the development of the Preserve. The residence retains all seven aspects of integrity. Therefore, Halsey House is considered a historical resource. The demolition of Halsey House would permanently remove the resource, resulting in a substantial adverse change to a significant historical resource pursuant to CEQA Guidelines Section 15064.5.

Impact CUL-1: Implementation of the proposed project would result in the demolition of the Halsey House, which is a historic resource.

Mitigation Measures:

MM CUL-1.1: **Historic Resources Mitigation Action Plan.** Prior to issuance of any demolition permits, the City shall retain a qualified historian to prepare and submit a Historic Resources Mitigation Action Plan (Action Plan) to the Director of Development Services or the Director's designee for review and approval. The Action Plan shall include the following elements:

Documentation. The structure and associated features on the project site shall be documented in accordance with the guidelines established for the Level III Historic American Building Survey (HABS) consistent with the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The documentation shall be funded by the City and undertaken by a qualified historian who meets the Secretary of the Interior's Professional Qualification Standards for history, architectural history, or historic architecture (Code of Federal Regulations, Title 36, Part 61, Appendix A). The documentation shall consist of the following components:

- A. Drawings – Original architectural drawings or as-built measured drawings of the building shall be submitted as part of the documentation package. Reasonable efforts shall be made to locate original drawings of the historic building. If located, selected representative drawings (such as site plans, elevations, sections, and relevant key details) shall be photographed or scanned at high resolution, reproduced, and included

in the dataset. If original architectural or construction drawings cannot be located, then measured drawings shall be prepared according to HABS guidelines by a professional who meets the Secretary of the Interior's Professional Qualification Standards for Architecture or Historic Architecture. The measured drawings shall be reviewed by the historian retained to prepare the written historical report.

- B. Photographs – Digital photographs shall be taken of the historic building, associated landscaping, and the overall character and setting of the property. All digital photography shall be conducted according to current National Park Service (NPS) standards as specified in the National Register of Historic Places and National Historic Landmarks Program Consolidated and Updated Photograph Policy 2024. The photography shall be undertaken by a qualified professional with demonstrated experience in documentation photography. Large format negatives are not required. All photographs shall be referenced on a photographic key map or site plan. The photographic key shall show the photograph number with an arrow to indicate the direction of the view. Digital photographs shall be taken in uncompressed RAW file format and saved as TIFF files. The size of each image shall be a minimum of 1600x1200 pixels at 300 pixels per inch or larger and in color format. The file name for each electronic image shall correspond with the index of photographs and photograph label.
- C. Written Data – A written historical narrative and report that meets the HABS Historical Report Guidelines shall be produced for the property by a qualified historian. The HABS-Style Historical Report shall follow the outline format with a statement of significance of the property.

The documentation shall be submitted to the Director of Development Services or the Director's designee for review and approval. After approval, the required documentation shall be filed with the Northwest Information Center at Sonoma State University (the repository for the California Historical Resources Information System) and the Los Altos History Museum.

Interpretive Display. Prior to issuance of any demolition permits, the City, in consultation with a qualified historian or architectural historian who meets the Secretary of the Interior's Professional Qualification Standards, shall provide plans for interpretative signage for the property to provide historical context and education about the history of the property. The plans shall include the proposed display type(s) and location(s) of the content, as well as high-quality graphics and written narratives that will be incorporated. In addition to narrative text, the interpretative display(s) may include, but are not limited to, a display of photographs, news articles, and drawings. The permanent, high-quality interpretive display(s) shall be installed within the

project site boundaries, made of durable all-weather materials, and positioned to allow for high public visibility and interactivity. The signage plan shall be reviewed and approved by the Director of Development Services or the Director's designee prior to issuance of any demolition permits.

MM CUL-1.2: **Salvage.** The structure shall be made available for salvage to companies facilitating the reuse of historic building materials prior to the issuance of any demolition permits. The time frame available for salvage shall be established by the Director of Development Services or the Director's designee in accordance with the Action Plan. The City must provide evidence to the Director of Development Services or the Director's designee that this condition has been met prior to the issuance of any demolition permits.

Even with implementation of mitigation measures MM CUL-1.1 and MM CUL-1.2, the proposed project would result in the demolition of a CRHR eligible property and a City Historic Landmark. As a result, the proposed project would result in a significant unavoidable impact to a historic resource.
(Significant and Unavoidable Impact with Mitigation Incorporated)

-
- b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?
-

It is possible that unrecorded archaeological resources could be encountered during project demolition. The project would be required to implement the following Standard Condition of Approval to avoid impacts to unrecorded archaeological resources (if discovered on-site).

Standard Condition of Approval:

- **Discovery of Archaeological Resources:** If prehistoric or historic-period cultural materials are unearthed during ground-disturbing activities, all work within 100 feet of the find shall be halted until a qualified archaeologist and Native American representative can assess the significance of the find. Prehistoric materials might include obsidian and chert-flaked stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil ("midden") containing heat-affected rocks and artifacts; stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered-stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. If the find is determined to be significant, the archaeologist, in consultation with the Native American representative, will develop a treatment plan that could include site avoidance, capping, or data recovery.

Implementation of the above Standard Condition of Approval would reduce impacts to unrecorded archaeological resources to a less than significant level. **(Less than Significant Impact)**

- c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?
-

Human graves are most often associated with prehistoric occupation sites. Although unlikely, it is possible that project demolition activities could disturb unrecorded human remains. The project would be required to implement the following Standard Condition of Approval to avoid impacts to human remains (if discovered on-site).

Standard Condition of Approval:

- **Discovery of Human Remains:** In the event of the discovery of human remains during construction or demolition, there shall be no further excavation or disturbance of the site within a 50-foot radius of the location of such discovery, or any nearby area reasonably suspected to overlie adjacent remains. The Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to their authority, the Coroner shall notify the Native American Heritage Commission, which shall attempt to identify descendants of the deceased Native American. If no satisfactory agreement can be reached as to the disposition of the remains, then the City shall reinter the human remains and associated burial items on the property in a location not subject to further subsurface disturbance. A final report shall be submitted to the City's Development Services Director. This report shall contain a description of the mitigation programs and its results, including a description of the monitoring and testing resources analysis methodology and conclusions, and a description of the disposition/curation of the resources. The report shall verify completion of the mitigation program to the satisfaction of the City's Development Services Director.

The above Standard Condition of Approval would reduce impacts to human remains to a less than significant level. **(Less than Significant Impact)**

4.5.2.2 *Cumulative Impacts*

- a) Would the project result in a cumulatively considerable contribution to a significant cumulative cultural resources impact?
-

The geographic area for cumulative impacts to cultural resources includes the project site and surrounding area because it is assumed disturbance in the project area would affect similar cultural resources.

Historic Structures

Implementation of the proposed project would result in the loss of a City of Los Altos Historic Landmark and a structure eligible to be listed on the CRHR due to its contribution to residential patterns of local history. However, as discussed in Section 4.5.1.2 Existing Conditions, the Halsey House lacks the decorative features typical of both modest and high-style examples of the Spanish Colonial Revival Style. Further, it is not the only example of the Spanish Colonial Revival style in Los Altos or the Bay Area such that it would be considered a rare example, nor is it associated with a well-known architect. Since the Halsey House would not be considered rare, the loss of this building would not be cumulatively considerable. **(Less than Significant Cumulative Impact)**

Archaeological Resources

The cumulative projects (refer to the list in Table 4.0-1) may require excavation and grading or other activities that may affect unknown prehistoric cultural resources and/or historic resources. As a result, the City's Standard Condition of Approval requires of all projects to reduce impacts to subsurface cultural resources to a less than significant level. In addition, project-level analyses for sites located in archaeologically sensitive areas would determine the necessity of additional mitigation measures to reduce localized and site-specific impacts to these resources. All projects would also be subject to federal, state, and local regulations pertaining to the protection of cultural resources. As a result, the project would not result in a cumulatively considerable impact to subsurface archaeological resources. **(Less than Significant Cumulative Impact)**

Human Remains

All cumulative projects (including the project) are required to comply with existing regulations, including California Health and Safety Code Sections 7054 and 7050.5 and Public Resources Code Sections 5097.9 through 5097.99, and the City's Standard Condition of Approval to reduce impacts to human remains to a less than significant level. For these reasons, the cumulative projects (including the project) would not result in significant cumulative impacts on human remains. **(Less than Significant Cumulative Impact)**

4.6 Energy

4.6.1 Environmental Setting

4.6.1.1 *Regulatory Framework*

Local

Los Altos Municipal Code

Chapter 6.14 – Collection, Recycling and Disposal of Waste Generated from Deconstruction, Demolition, Construction and Renovation Projects, in the LAMC, seeks to divert at least 65 percent of construction and demolition debris unless the applicant is granted an infeasibility exemption.

4.6.1.2 *Existing Conditions*

The existing building has been vacant since 2008 and does not currently consume electricity or natural gas.

4.6.2 Impact Discussion

For the purpose of determining the significance of the project's impact on energy, would the project:

- 1) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- 2) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?
- 3) Result in a substantial increase in demand upon energy resources in relation to projected supplies?

4.6.2.1 *Project Impacts*

-
- a) Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
-

Demolition

Demolition of the project would require energy for the operation of equipment and trucks (e.g., diesel and gasoline fuel). Demolition processes are generally designed to be efficient in order to avoid excess monetary costs. Furthermore, the proposed demolition would occur in an urbanized area in proximity to roadways, construction supplies, and workers, making it more efficient than construction occurring in outlying, undeveloped areas. For these reasons, the proposed demolition would not use energy in a wasteful manner. **(Less than Significant Impact)**

Operation

The project site would be vacant and undeveloped after demolition; therefore, no net increase in energy use would occur and the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during project operation. **(No Impact)**

- b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?
-

The project is a demolition project that would use energy temporarily during demolition but not require permanent energy use as no operational activities are proposed. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

- c) Would the project result in a substantial increase in demand upon energy resources in relation to projected supplies?
-

Electricity

The project proposes only demolition, which is a temporary activity (about three months) that would not result in a permanent increase in electricity consumption. Any electricity use would cease upon completion of the demolition. As a result, the project's electricity use would not result in a significant increase in demand on electrical energy resources in relation to projected supplies statewide. **(No Impact)**

Natural Gas

The project would not result in any substantial increase in natural gas demand relative to projected supply because it would not use any natural gas. **(No Impact)**

Fuel Usage

During demolition, diesel and gasoline would be consumed to fuel the equipment used on-site and trucks traveling to and from the site. This fuel consumption would be temporary and cease upon completion of the demolition. As a result, the project would not result in a significant increase in gasoline demand relative to projected supply. **(Less than Significant Impact)**

4.6.2.2 Cumulative Impacts

- a) Would the project result in a cumulatively considerable contribution to a significant cumulative energy impact?
-

By its nature, energy is a cumulative resource. The geographic area for cumulative energy impacts is the state. Past, present, and future development projects contribute to the state's energy impacts. If the project is determined to have a significant energy impact, it is concluded that the impact is cumulatively considerable. As discussed under checklist questions a) through c) above, the project would not result in significant energy impacts. Therefore, the project would not result in a cumulatively considerable contribution to a significant cumulative energy impact. **(Less than Significant Cumulative Impact)**

4.7 Geology and Soils

The following discussion is based, in part, on a geological hazard evaluation and geotechnical investigation prepared for the project by Cornerstone Earth Group in February 2024. The report is attached to this EIR as Appendix E.

4.7.1 Environmental Setting

4.7.1.1 *Regulatory Framework*

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act regulates development in California near known active faults due to hazards associated with surface fault ruptures. Alquist-Priolo maps are distributed to affected cities, counties, and state agencies for their use in planning and controlling new construction. Areas within an Alquist-Priolo Earthquake Fault Zone require special studies to evaluate the potential for surface rupture to ensure that no structures intended for human occupancy are constructed across an active fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) directs the California Geological Survey (CGS) to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. CGS has completed seismic hazard mapping for the portions of California most susceptible to liquefaction, landslides, and ground shaking, including the central Bay Area. The SHMA requires that agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the seismic hazard is present and identify measures to reduce earthquake-related hazards.

California Green Building Code

CALGreen Code Section 5.106.1 requires projects that disturb less than one acre of land prevent the pollution of stormwater runoff from demolition and construction activities through compliance with a lawfully enacted stormwater management and/or erosion control ordinance, or through implementation of CALGreen BMPs. CALGreen BMPs include the following:

- Soil loss BMP's that should be considered for implementation as appropriate for each project include, but are not limited to, the following:
 - Scheduling construction activity during dry weather, when possible;
 - Preservation of natural features, vegetation, soil, and buffers around surface waters;
 - Drainage swales or lined ditches to control stormwater flow;
 - Mulching or hydroseeding to stabilize disturbed soils;
 - Erosion control to protect slopes;

- Protection of storm drain inlets (gravel bags or catch basin inserts);
- Perimeter sediment control (perimeter silt fence, fiber rolls);
- Sediment trap or sediment basin to retain sediment on site;
- Stabilized construction exits;
- Wind erosion control;
- Other soil loss BMPs acceptable to the enforcing agency
- Good housekeeping BMP's to manage construction equipment, materials, non-stormwater discharges, and wastes that should be considered for implementation as appropriate for each project include, but are not limited to, the following:
 - Dewatering activities;
 - Material handling and waste management;
 - Building materials stockpile management;
 - Management of washout areas (concrete, paints, stucco, etc.);
 - Control of vehicle/equipment fueling to contractor's staging area;
 - Vehicle and equipment cleaning performed off site;
 - Spill prevention and control;
 - Other housekeeping BMPs acceptable to the enforcing agency.

California Division of Occupational Safety and Health Regulations

Excavation, shoring, and trenching activities during construction are subject to occupational safety standards for stabilization by the California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA) under Title 8 of the California Code of Regulations and Excavation Rules. These regulations minimize the potential for instability and collapse that could injure construction workers on the site.

Public Resources Code Section 5097.5

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. They range from mammoth and dinosaur bones to impressions of ancient animals and plants, trace remains, and microfossils. These materials are valued for the information they yield about the history of the earth and its past ecological settings. Under the CEQA Guidelines, a project would have a significant impact on paleontological resources if it would disturb or destroy a unique paleontological resource or site or unique geologic feature.

Regional

Municipal Regional Permit Provision C.6

Provision C.6 of the MRP requires permittees to implement a construction site inspection and control program at all construction sites to prevent construction site discharges of pollutants and impacts to beneficial uses of receiving waters. All construction sites are required to have site specific and seasonally and phase-appropriate BMPs pertaining to erosion control, run-on and run-off control, sediment control, active treatment systems, good site management, and stormwater management.

4.7.1.2 Existing Conditions

Regional Geology

The City of Los Altos is located in the northern portion of the Coast Ranges Geomorphic Province in California. The mountain ranges in this Geomorphic Province are generally northwest trending and were formed tens of millions of years ago by intense folding and faulting caused by tectonic activity between the Pacific Oceanic Plate and the North American Continental Plate.

On-site Geological Conditions

Soils and Topography

The topography of the site is relatively flat with the site being approximately 210 feet above mean sea level (amsl). Soils on-site were found to be a mixture of undocumented fill, native stiff to hard sandy lean clay, and clay (dense and very stiff). Undocumented fill was found to a depth of one foot below ground surface (bgs). Native stiff to hard sandy lean clay was found one foot to 14.5 feet bgs and medium dense to dense clay sand was identified approximately 21.5 feet bgs. Very stiff lean clay was found approximately 23.5 feet bgs.²² On-site soils are classified as having low expansion potential.²³

Seismicity and Seismic Hazards

As the Bay Area contains numerous active and potentially active faults, there is a high potential for seismic events such as fault surface ruptures and ground shaking, which can cause ground failure (landslides), settlement, erosion, liquefaction, lateral spreading, and soil expansion. Faults in the region are capable of generating earthquakes of magnitude 6.7 or higher, and strong-to very- strong ground shaking would be expected to occur at the project site during a major earthquake on one of the nearby faults. The nearest active fault to the project site is the Monte Vista-Shannon fault approximately 2.7 miles west of the project site. The San Andreas fault line is approximately 4.3 miles west of the project site and the Hayward fault line is approximately 13.7 miles northeast of the project site.²⁴ The project site is not located within a State of California Earthquake Fault Zone or a Fault-Rupture Hazard Zone.²⁵

During a major earthquake on a segment of one of the nearby faults, strong to severe ground shaking is expected to occur at the project site. The ground shaking intensity felt at the project site would depend on the size of the earthquake (magnitude), the distance from the site to the fault source, the directivity (focusing of earthquake energy along the fault in the direction of the rupture), and the site-specific soil conditions.

²² Cornerstone Earth Group. *Geotechnical Investigation Halsey House*. February 2024. Page 4.

²³ County of Santa Clara. "Soils of Santa Clara County" Accessed December 19, 2025. <https://hub.arcgis.com/datasets/sccplanning::soils-of-santa-clara-county/explore>.

²⁴ Cornerstone Earth Group. *Geotechnical Investigation Halsey House*. February 2024. Page 3.

²⁵ California Department of Conservation. "Earthquake Zones of Required Investigation." Accessed December 19, 2025. <https://maps.conservation.ca.gov/cgs/EQZApp/>.

Liquefaction and Lateral Spreading

Soil liquefaction can be defined as a complete loss of strength that causes otherwise solid soil to take on the characteristics of a liquid. The types of soil most susceptible to this hazard are loose, saturated, uniformly graded, fine-grain sands. Liquefaction most frequently occurs under vibratory conditions, such as those created by seismic events. The project area is located in a designated liquefaction hazard zone.²⁶

Lateral spreading typically occurs as a form of horizontal displacement of relatively flat-lying soil toward an open or “free” face such as an open body of water, channel, or excavation. This movement is often associated with liquefaction and commonly occurs on gentle slopes in seismically active regions. Lateral spread presents a significant hazard to the integrity of buildings and other structures. The nearest waterbody to the project site where lateral spreading may occur is Adobe Creek, approximately 50 feet north of the project site. Based on historical ground failure mapping for the project area, no occurrences of lateral spreading were identified.²⁷

Landslides

The project site is relatively flat and is not mapped within a state-designated Landslide Hazard Zone.²⁸

Groundwater

Groundwater was encountered at depths ranging from 10 to 15 feet bgs.²⁹ Water levels on-site may vary depending on seasonal precipitation, irrigation practices, and other climate conditions.

Paleontological Resources and Geological Features

Most of the City, including the project site, is situated on alluvial fan deposits of Holocene age that have a low potential to contain paleontological resources.³⁰ There are no unique geological features (e.g., serpentine rock outcrops) on the project site.

4.7.2 Impact Discussion

For the purpose of determining the significance of the project’s impact on geology and soils, would the project:

- 1) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

²⁶ Cornerstone Earth Group. *Geotechnical Investigation Halsey House*. February 2024. Page 5.

²⁷ Ibid.

²⁸ Ibid., page 6.

²⁹ Ibid., page 4.

³⁰ City of Los Altos. *Los Altos General Plan Initial Study/Mitigated Negative Declaration*. November 2002. Page 20.

- Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)?
 - Strong seismic ground shaking?
 - Seismic-related ground failure, including liquefaction?
 - Landslides?
- 2) Result in substantial soil erosion or the loss of topsoil?
 - 3) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
 - 4) Be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?
 - 5) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
 - 6) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

4.7.2.1 *Project Impacts*

-
- a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?
-

Fault Rupture

As discussed in Section 4.7.1.2 Existing Conditions, the project site is not located in an Alquist-Priolo Earthquake Fault Zone, has no known faults. The site would be vacant after demolition of the Halsey House. Therefore, there would be no impacts related to fault rupture. **(No Impact)**

Seismic Ground Shaking

There are several major fault lines within 30 miles of the project site that have the potential to produce earthquakes with a magnitude of 6.0 or higher. During a major earthquake on a segment of one of the nearby faults, strong to severe ground shaking is expected to occur at the project site. However, there would be no damage to structures or safety threats to occupants since no development is proposed. As such, the existing seismic hazards on the project would not be exacerbated by the project such that it would impact (or worsen) off-site conditions. For these reasons, there would be no impacts related to seismic ground shaking. **(No Impact)**

Liquefaction and Lateral Spreading

As described in Section 4.7.1.2 Existing Conditions, the project site is not located in a lateral spreading zone but is within a designated liquefaction hazard zone. No new development is proposed by the project; therefore, risks of liquefaction would have no impact on the project. Since the existing liquefaction hazard on the project site would not be exacerbated by the project, there would be no impact related to liquefaction and lateral spreading. **(No Impact)**

Landslides

As discussed in Section 4.7.1.2 Existing Conditions, the project site is not located in a designated landslide hazard zone. Demolition activities would not include substantial earthwork that would create unstable slopes that would exacerbate any existing landslide risks, and there are no risks of landslides impacting the project. For these reasons, there would be no impact related to landslides. **(No Impact)**

b) Would the project result in substantial soil erosion or the loss of topsoil?

The demolition of the Halsey House would result in soil disturbance. The project would disturb approximately 0.3 acres, which is below the one-acre threshold requiring compliance with the NPDES Construction General Permit. During demolition, the project would implement Standard Conditions of Approval requiring BMPs to control erosion of exposed soil surfaces, which would minimize soil erosion and loss of topsoil. The project would be subject to the CALGreen requirements to implement stormwater control measures during construction, such as wind erosion control, dewatering activities, material handling and waste management, and control of vehicle/equipment fueling to the staging area, and spill prevention and control. By implementing erosion control BMPs and stormwater control measures, consistent with City Standard Conditions of approval and CALGreen requirements, erosion and sedimentation impacts would be less than significant. **(Less than Significant Impact)**

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

As discussed under checklist question a), the project site is within a liquefaction hazard zone but the project would not site any new building or infrastructure on the project site. Therefore, the project would have no impact related to on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. **(No Impact)**

-
- d) Would the project be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?
-

The proposed project is the demolition of the Halsey House and would not construct any new buildings or structures on the project site. Therefore, there would be no direct or indirect risk to life or property due to expansive soils. **(No Impact)**

- e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
-

The project would not require any septic tanks or connect to the City's existing sanitary sewer systems because the project would not generate wastewater. **(No Impact)**

- f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?
-

As described in Section 4.7.1.2 Existing Conditions, the project site has low potential to contain paleontological resources and there are no unique geological features (e.g., serpentine rock outcrops) at the project site. While it is unlikely that paleontological resources would be encountered on-site, the project would implement the following Standard Condition of Approval to reduce potential impacts to paleontological resources.

Standard Condition of Approval:

- **Discovery of Paleontological Resources.** In the event that a fossil is discovered during construction of the project, excavations within 50 feet of the find shall be temporarily halted or delayed until the discovery is examined by a qualified paleontologist, in accordance with Society of Vertebrate Paleontology standards. The City shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If the find is determined to be significant and if avoidance is not feasible, the paleontologist shall design and carry out a data recovery plan consistent with the Society of Vertebrate Paleontology standards.

The above Standard Condition of Approval would reduce impacts to paleontological resources to a less than significant level. **(Less than Significant Impact)**

4.7.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant geology and soils impact?

The geographic area for cumulative geology and soils impacts includes the project site and adjacent parcels. All other projects within the vicinity would be subject to similar geology, soils, and seismicity impacts as the project. All projects occurring within the City are required to prepare a design-level geotechnical investigation and would be constructed consistent with the latest CBC to avoid and/or reduce impacts related to geologic hazards. Adherence to the Standard Conditions of Approval discussed in checklist question f) would reduce potential impacts to paleontological resources. Therefore, the project would not result in a cumulatively considerable contribution to a significant geology and soils impact. **(Less than Significant Cumulative Impact)**

4.8 Greenhouse Gas Emissions

4.8.1 Environmental Setting

4.8.1.1 *Regulatory Framework*

State

Assembly Bill 32 and State Bill 32

Under the California Global Warming Solutions Act, also known as AB 32, CARB established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for significant sources of GHGs, and adopted a comprehensive plan, known as the Climate Change Scoping Plan, identifying how emission reductions would be achieved from significant GHG sources. The first Scoping Plan was approved by CARB in 2008 and must be updated at least every five years. Since 2008, there have been two updates to the Scoping Plan.

In 2016, SB 32 was signed into law, amending the California Global Warming Solution Act. SB 32, and accompanying Executive Order B-30-15, requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to express the 2030 statewide target in terms of million metric tons of CO₂e (MMTCO₂e). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 MMTCO₂e.

2022 Scoping Plan

On December 15, 2022, CARB approved the 2022 Scoping Plan. The 2022 Scoping Plan provides a sector-by-sector guide on how to reduce man-made (i.e., anthropogenic) GHG emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045 over a 25-year horizon.³¹ The primary focus of the 2022 Scoping Plan is to reduce the usage of fossil fuels by electricizing the transportation sector, procuring electricity from renewable resources, phasing out natural gas in land use developments, and building transit-oriented communities that encourage multi-modal transportation. If implemented successfully, the 2022 Scoping Plan would not only reduce GHG emissions but also reduce smog-forming air pollution (NO_x) by 71 percent and reduce fossil fuel demand by 94 percent. The 2022 Scoping Plan also details natural carbon capture and storage process along with mechanical carbon capture programs to address the remaining 15 of anthropogenic GHG emissions that will remain post-2045. To meet these goals, CARB also includes a revised goal of reducing state GHG emissions 48 percent below 1990 levels by 2030.

³¹ CARB. *2022 Scoping Plan for Achieving Carbon Neutrality*. November 16, 2022. Page 5.

Executive Order B-55-18 and Assembly Bill 1279

Executive Order B-55-18 was issued in September 2018. It ordered a new statewide goal of achieving carbon neutrality no later than 2045 and to maintain net negative emissions thereafter.

Assembly Bill 1279, also known as the California Climate Crisis Act, was approved on September 16, 2022 and codifies the statewide goal set by Executive Order B-55-18 of achieving net zero GHG emissions no later than the year 2045 and maintaining net negative emissions thereafter. In addition, this bill has a statewide goal of reducing anthropogenic GHG emissions by 85 percent below the 1990 levels by the year 2045. The bill requires CARB to work with relevant state agencies to ensure that updates to the scoping plan identify and recommend measures to achieve these policy goals, and implement strategies that enable CO₂ removal solutions and carbon capture, utilization, and storage technologies in California. The bill requires CARB to submit an annual report.

Regional

2017 Clean Air Plan

To protect the climate, the 2017 Clean Air Plan prepared by the Air District includes control measures designed to reduce emissions of methane and other super-GHGs that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

BAAD CEQA Thresholds for Evaluating Climate Impacts from Land Use Projects and Plans

In April 2022, the Air District Board of Directors adopted the Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans. The report includes the Air District's thresholds of significance for use in determining whether a proposed project or plan will have a significant impact on climate change and provides substantial evidence to support these thresholds. The April 2022 GHG thresholds replace the GHG thresholds set forth in the May 2017 Air District CEQA Air Quality Guidelines and represent what is required of new land use development projects and plans to achieve California's long-term climate goal of carbon neutrality by 2045.

4.8.1.2 *Existing Conditions*

Unlike emissions of criteria and toxic air pollutants, which have regional and local impacts, emissions of GHGs have a broader, global impact. Global warming is a process whereby GHGs accumulating in the upper atmosphere contribute to an increase in the temperature of the earth and changes in weather patterns.

The Halsey House is vacant and does not generate GHG emissions.

4.8.2 Impact Discussion

For the purpose of determining the significance of the project's impact on greenhouse gas emissions, would the project:

- 1) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- 2) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

4.8.2.1 *Project Impacts*

-
- a) Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
-

The project would only generate temporary GHG emissions during demolition. Sources of GHG emissions would be demolition equipment, trucks traveling to and from the site, and worker trips. There would be no sources of operational GHG emissions post-demolition. Neither the City of Los Altos nor the Air District have an adopted threshold of significance for demolition-related GHG emissions. Since demolition would be temporary (approximately three months) and would not result in a permanent increase in emissions, the project would not result in a significant GHG impact from demolition emissions. **(Less than Significant Impact)**

-
- b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?
-

The project would not conflict with any applicable plan, policy, or regulations adopted for the purpose of reducing GHG emissions because the project does not propose to construct a building or infrastructure that would generate GHG emissions. The GHG emissions associated with the demolition of the Halsey House would be temporary and cease upon completion of demolition activities. Since the project would not create a new source of GHG emissions, it would not interfere with the overall goals under SB 32 or as outlined in the 2022 Scoping Plan. **(Less than Significant Impact)**

4.8.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant GHG emissions impact?

As discussed above, GHG emissions have a broader, global impact. No single land use project could generate sufficient GHG emissions on its own to noticeably change the global average temperature.

The combination of GHG emissions from past, present, and future projects in Los Altos, the entire state of California, and across the nation and around the world, contribute cumulatively to the phenomenon of global climate change and its associated environmental impacts. The above analysis of the project's GHG emissions impacts is, therefore, also an analysis of the project's contribution to cumulative GHG emissions impacts. The project would only generate temporary GHG emissions not permanent operational sources of GHG emissions. Therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant GHG impact.

(Less than Significant Cumulative Impact)

4.9 Hazards and Hazardous Materials

4.9.1 Environmental Setting

4.9.1.1 *Regulatory Framework*

Overview

The storage, use, generation, transport, and disposal of hazardous materials and waste are highly regulated under federal and state laws. In California, the EPA has granted enforcement authority over federal hazardous materials regulations to the California Environmental Protection Agency (CalEPA). In turn, local agencies have been granted responsibility for implementation and enforcement of many hazardous materials regulations under the Certified Unified Program Agency (CUPA) program.

Worker health and safety and public safety are key issues when dealing with hazardous materials. Proper handling and disposal of hazardous material is vital if it is disturbed during project construction. Cal/OSHA enforces state worker health and safety regulations related to construction activities. Regulations include exposure limits, requirements for protective clothing, and training requirements to prevent exposure to hazardous materials. Cal/OSHA also enforces occupational health and safety regulations specific to lead and asbestos investigations and abatement.

Federal and State

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries and provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Over five years, \$1.6 billion was collected and the tax went to a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. CERCLA accomplished the following objectives:

- Established prohibitions and requirements concerning closed and abandoned hazardous waste sites;
- Provided for liability of persons responsible for releases of hazardous waste at these sites; and
- Established a trust fund to provide for cleanup when no responsible party could be identified.

The law authorizes two kinds of response actions:

- Short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response; and
- Long-term remedial response actions that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life-threatening. These actions can be completed only at sites listed on the EPA's National Priorities List.

CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.³²

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA), enacted in 1976, is the principal federal law in the United States governing the disposal of solid waste and hazardous waste. RCRA gives the EPA the authority to control hazardous waste from the "cradle to the grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes.

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization, phasing out land disposal of hazardous waste, and corrective action for releases. Some of the other mandates of this law include increased enforcement authority for the EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.³³

Government Code Section 65962.5

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state and local agencies and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB).³⁴

³² United States Environmental Protection Agency. "Superfund: CERCLA Overview." Accessed December 19, 2025. <https://www.epa.gov/superfund/superfund-cercla-overview>.

³³ United States Environmental Protection Agency. "Summary of the Resource Conservation and Recovery Act." Accessed December 19, 2025. <https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act>.

³⁴ California Environmental Protection Agency. "Cortese List Data Resources." Accessed December 19, 2025. <https://calepa.ca.gov/sitecleanup/corteselist/>.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides the EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. The TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint.

Asbestos-Containing Materials

Friable asbestos is any asbestos-containing material (ACM) that, when dry, can easily be crumbled or pulverized to a powder by hand, allowing the asbestos particles to become airborne. Common examples of products that have been found to contain friable asbestos include acoustical ceilings, plaster, wallboard, and thermal insulation for water heaters and pipes. Common examples of non-friable ACMs are asphalt roofing shingles, vinyl floor tiles, and transite siding made with cement. The EPA began phasing out use of friable asbestos products in 1973 and issued a ban in 1978 on manufacture, import, processing, and distribution of some asbestos-containing products and new uses of asbestos products.³⁵ The EPA is currently considering a proposed ban on on-going use of asbestos.³⁶ National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines require that potentially friable ACMs be removed prior to building demolition or remodeling that may disturb the ACMs.

CCR Title 8, Section 1532.1

The United States Consumer Product Safety Commission banned the use of lead-based paint in 1978. Removal of older structures with lead-based paint is subject to requirements outlined by the Cal/OSHA Lead in Construction Standard, CCR Title 8, Section 1532.1 during demolition activities. Requirements include employee training, employee air monitoring, and dust control. If lead-based paint is peeling, flaking, or blistered, it is required to be removed prior to demolition.

Fire Hazard Severity Zones

CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. Referred to as Fire Hazard Severity Zones (FHSZs), these maps influence how people construct buildings and protect property to reduce risk associated with wildland fires. FHSZs are divided into areas where the state has financial responsibility for wildland fire protection, known as state responsibility areas (SRAs), and areas where local governments have financial responsibility for wildland fire protection, known as local responsibility areas (LRAs). Homeowners living in an SRA are responsible for ensuring that their property is in compliance with California's building and fire codes. Only lands zoned for very high fire hazard are identified within LRAs.

³⁵ United States Environmental Protection Agency. "EPA Actions to Protect the Public from Exposure to Asbestos." Accessed December 19, 2025. <https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos>

³⁶ *ibid.*

Local

Los Altos General Plan

The following policies in the City's General Plan have been adopted for the purpose of reducing or avoiding impacts related to hazards and hazardous materials and are applicable to the project.

Policy	Description
NEH 3.1	Cooperate with and participate in development of the policies and future programs of the Santa Clara County Health Department and the California Legislature.
NEH 3.2	Support the management of hazardous materials contamination and abatement by public and private agencies.
NEH 6.1	Maintain an updated Emergency Preparedness Plan. The plan should increase public awareness of natural hazards and hazards associated with human activity and of methods to avoid or mitigate the effects of these hazards and should ensure that critical facilities will function during and after a disaster.

Los Altos Municipal Code

Chapter 10.08 of the LAMC seeks to protect the citizens of Los Altos through prevention and control of unauthorized discharges of hazardous materials. Chapter 10.08 includes several hazardous materials regulations, such as requiring construction sites to maintain a spill response plan, prohibiting the storage of materials next to storm drains, and prohibiting the disposal of hazardous materials in an area that may eventually lead to pollution reaching the sewer system.

City of Los Altos Emergency Operations Plan

The City of Los Altos updated its Emergency Operations Plan (EOP) in October 2018. The City of Los Altos EOP outlines the City's framework for managing a variety of hazards such as natural disasters and human-caused events. The EOP describes organizational structures, roles and responsibilities, policies, and protocols for providing emergency support. The EOP details the City's mitigation strategies, preparedness planning, short and long-term recovery strategies, and the operating procedures for the Emergency Operations Center (EOC). It also details the jurisdictional structure for responding to emergencies when the response may require regional, state, or federal coordination.

4.9.1.2 *Existing Conditions*

Site History

As discussed in Section 4.5 Cultural Resources, the site was undeveloped until the Halsey House was constructed in 1923. Starting in 1974, the property and Halsey House served as a public educational center and museum. Since 2008, the Halsey House has been vacant.

Potential On- and Off-Site Sources of Contamination

Asbestos Containing Materials and Lead-Based Paint

Due to the age of the existing building, ACMs and lead-based paint may be present on-site.

Cortese List

The project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.^{37, 38, 39}

Wildland Fires

The project site is in an urban area surrounded by existing development. The project site is not located near wildlands that could present a fire hazard. The site is not located within an identified Very High Fire Hazard Severity Zone in an SRA or LRA.⁴⁰

Proximity to an Airport

The project site is not located within an airport land use plan area. Moffett Federal Airfield, a joint civil military airport, located approximately 4.5 miles northeast of the project site, is the nearest airport.

4.9.2 Impact Discussion

For the purpose of determining the significance of the project's impact on hazards and hazardous materials, would the project:

- 1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- 2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- 3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

³⁷ Department of Toxic Substances Control. "EnviroStor database." Accessed December 19, 2025. <https://www.envirostor.dtsc.ca.gov/public>.

³⁸ State Water Resources Control Board. "GeoTracker." Accessed December 19, 2025. <https://geotracker.waterboards.ca.gov>.

³⁹ California Environmental Protection Agency. "Cortese List Data Resources." Accessed November December 19, 2025. <https://calepa.ca.gov/sitecleanup/corteselist/>.

⁴⁰ California Department of Forestry and Fire Protection. "Fire Hazard Severity Zones." Accessed December 19, 2025. <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>.

- 4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- 5) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?
- 6) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- 7) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

4.9.2.1 *Project Impacts*

- a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
-

The proposed project would demolish the Halsey House building. Demolition would involve the use of fuels, oils, and fluids for vehicles and equipment. All hazardous materials would 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. Demolition-related hazardous materials use would be temporary, and does not constitute routine transport, use, or disposal. The project does not propose to use or store any hazardous materials on-site after demolition. The project does not propose construction of any buildings or structures on-site. Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. **(Less than Significant Impact)**

- b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
-

Demolition

As discussed in Section 4.9.1.2 Existing Conditions, ACMs and lead-based paint may be present on-site due to the age of the existing building (pre-1980 construction). Demolition of the existing building could expose construction workers or residents in the vicinity of the project site to harmful levels of ACMs or lead. The project is required to conform to regulatory programs for the presence of ACMs and/or lead-based paint.

Impact HAZ-1: Demolition of the existing building could expose construction workers or residents in the vicinity of the project site to harmful levels of asbestos-containing materials or lead-based paints.

Mitigation Measures:

- MM HAZ-1.1: Pre-Demolition Survey.** In conformance with State and local laws, a visual inspection/pre-demolition survey, and possible sampling, shall be conducted prior to the demolition of on-site buildings to determine the presence of asbestos-containing materials and/or lead-based paint.
- MM HAZ-1.2: Removal of Asbestos-Containing Materials.** All potentially friable asbestos-containing materials shall be removed in accordance with National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines prior to any building demolition or renovation that may disturb the materials. All demolition activities will be undertaken in accordance with Cal/OSHA standards contained in Title 8 of California Code of Regulations (CCR), Section 1529, to protect workers from exposure to asbestos. A registered asbestos abatement contractor shall be retained to remove and dispose of asbestos-containing materials identified in the asbestos survey performed for the site in accordance with the aforementioned standards. Materials containing more than one percent asbestos are also subject to Bay Area Air District (Air District) regulations. Removal of materials containing more than one percent asbestos shall be completed in accordance with Air District requirements.
- MM HAZ-1.3: Removal of Lead-Based Paint.** Prior to demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR 1523.1, including employee training, employee air monitoring, and dust control. Any debris or soil containing lead-based paint or coatings would be disposed of at landfills that meet acceptance criteria for the waste being disposed.

Conformance with MM HAZ-1.1 through MM HAZ-1.3 would result in a less than significant impact from ACMs and lead by determining the presence and ensuring proper removal and disposal of both materials. The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during demolition. There would be no operational impacts. **(Less than Significant Impact with Mitigation Incorporated)**

-
- c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
-

The nearest schools are the Los Altos Chinese school, approximately 0.6 mile east of the site, and Covington Elementary School, approximately 0.6 mile southeast of the site. There are no known proposed schools within one-quarter mile of the project site. Therefore, the project would not emit hazardous emissions within one-quarter mile of an existing school or proposed school. **(No Impact)**

-
- d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
-

As discussed in Section 4.9.1.2 Existing Conditions, the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. **(No Impact)**

- e) If located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?
-

As discussed in Section 4.9.1.2 Existing Conditions, the project site is not located within an airport land use plan or within two miles of an airport. Therefore, the proposed project would not result in safety hazard or noise impacts due to airport activities. **(No Impact)**

- f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
-

As discussed in Section 4.9.1.1 Regulatory Framework, the City of Los Altos has an EOP that outlines the City's framework for managing a variety of hazards such as natural disasters and human-caused events. Demolition would occur within the project site and would not block access to roadways. There would be no structures on-site post-demolition. Therefore, the project would not impair implementation of or physically interfere with the EOP, including its operating procedures. **(No Impact)**

- g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?
-

As discussed in Section 4.9.1.1 Regulatory Framework, the project site is not located in or near SRAs or lands classified as very high FHSZs. Therefore, the project would not result in wildfire impacts. **(No Impact)**

4.9.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant hazards and hazardous materials impact?

The geographic area for cumulative hazards and hazardous materials impacts is the project site and immediate vicinity. There are no other proposed projects within the immediate vicinity of the site. As discussed above, the project would not create a significant hazard to the public or the

environment through the routine transport, use, or disposal of hazardous materials, or impair implementation of the City's EOP. Additionally, the project site is not located within one-quarter mile of an existing or proposed school, within two miles of an airport, or in or near SRAs or very high FHSZs. As discussed under checklist question b), the project would implement Standard Conditions of Approval to reduce the presence of ACMs and/or lead-based paint. For these reasons, the proposed project would not result in a cumulatively considerable contribution to cumulatively significant hazards and hazardous materials impact. **(Less than Significant Cumulative Impact)**

4.10 Hydrology and Water Quality

The following discussion is based, in part, on a hydrology memorandum prepared for the project by Schaaf & Wheeler in March 2024. The report is attached to this EIR as Appendix F.

4.10.1 Environmental Setting

4.10.1.1 *Regulatory Framework*

Federal and State

The federal Clean Water Act and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality in California. Regulations set forth by the EPA and the SWRCB have been developed to fulfill the requirements of this legislation. EPA regulations include the NPDES permit program, which controls sources that discharge pollutants into the waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by the RWQCBs. The project site is within the jurisdiction of the San Francisco Bay RWQCB.

Under Section 303(d) of the federal Clean Water Act, the SWRCB and RWQCBs are required to identify impaired surface water bodies that do not meet water quality standards and develop total maximum daily loads for contaminants of concern. The list of the state's identified impaired surface water bodies, known as the "303(d) list" can be found on the on the SWRCB's website.⁴¹

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) established the National Flood Insurance Program to reduce impacts of flooding on private and public properties. The program provides subsidized flood insurance to communities that comply with FEMA regulations protecting development in floodplains. As part of the program, FEMA publishes Flood Insurance Rate Maps that identify Special Flood Hazard Areas (SFHAs). An SFHA is an area that would be inundated by the one-percent annual chance flood, which is also referred to as the base flood or 100-year flood.

Statewide Construction General Permit

The SWRCB has implemented an NPDES General Construction Permit for the State of California (Construction General Permit). For projects disturbing one acre or more of soil, a Notice of Intent (NOI) must be filed with the RWQCB by the project sponsor, and a Storm Water Pollution Prevention Plan (SWPPP) must be prepared by a qualified professional prior to commencement of construction and filed with the RWQCB by the project sponsor. The Construction General Permit includes requirements for training, inspections, record keeping, and, for projects of certain risk

⁴¹ California State Water Resources Control Board. "2020-2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report)." May 11, 2022. Accessed December 19, 2025. https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html.

levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges.

Regional

San Francisco Bay Basin Plan

The San Francisco Bay RWQCB regulates water quality in accordance with the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan lists the beneficial uses that the San Francisco Bay RWQCB has identified for local aquifers, streams, marshes, rivers, and the San Francisco Bay, as well as the water quality objectives and criteria that must be met to protect these uses. The San Francisco Bay RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements, including permits for nonpoint sources such as the urban runoff discharged by a City's stormwater drainage system. The Basin Plan also describes watershed management programs and water quality attainment strategies.

Municipal Regional Permit Provision C.6

Provision C.6 of the MRP requires permittees to implement a construction site inspection and control program at all construction sites to prevent construction site discharges of pollutants and impacts to beneficial uses of receiving waters. All construction sites are required to have site specific and seasonally and phase-appropriate BMPs pertaining to erosion control, run-on and run-off control, sediment control, active treatment systems, good site management, and stormwater management.

Water Resources Protection Ordinance and District Well Ordinance

Valley Water operates as the flood control agency for Santa Clara County. Valley Water also provides stream stewardship and is the wholesale water supplier throughout the county, which includes the groundwater recharge program. Well construction and deconstruction permits, including borings 45 feet or deeper, are required under Valley Water's Well Ordinance 90-1. Under Valley Water's Water Resources Protection Ordinance, projects within Valley Water property or easements are required to obtain encroachment permits.

2021 Groundwater Management Plan

The 2021 Groundwater Management Plan (GWMP) describes Valley Water's comprehensive groundwater management framework, including existing and potential actions to achieve basin sustainability goals and ensure continued sustainable groundwater management. The GWMP covers the Santa Clara and Llagas subbasins, which are located entirely in Santa Clara County. Valley Water manages a diverse water supply portfolio, with sources including groundwater, local surface water, imported water, and recycled water. About half of the county's water supply comes from local sources and the other half comes from imported sources. Imported water includes the District's State Water Project and Central Valley contract supplies and supplies delivered by the San

Francisco Public Utilities Commission (SFPUC) to cities in northern Santa Clara County. Local sources include natural groundwater recharge and surface water supplies. A small portion of the county's water supply is recycled water.

Local groundwater resources make up the foundation of the county's water supply, but they need to be augmented by the District's comprehensive water supply management activities to reliably meet the county's needs. These include the managed recharge of imported and local surface water and in-lieu groundwater recharge through the provision of treated surface water and raw water, acquisition of supplemental water supplies, and water conservation and recycling.⁴²

Local

Los Altos General Plan

The following policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating impacts on hydrology and water quality and are applicable to the project:

Policy	Description
IWD 3.1	Control surface runoff discharges into the stormwater system to comply with the National Pollution Discharge Elimination System Permit and the receiving water limitations assigned by the California Regional Water Quality Control Board.
IWD 3.3	Minimize the amount of impervious surfaces and directly connected impervious surfaces in areas of new development and redevelopment and where feasible maximize on-site infiltration of stormwater runoff.
IWD 3.4	Implement pollution prevention methods supplemented by pollutant source controls and treatment. Use small collection strategies located at, or as close as possible to the source (i.e., the point where water initially meets the ground) to minimize the transport of urban runoff and pollutants offsite.

Los Altos Municipal Code

Section 10.16 of the LAMC requires new development to implement permanent stormwater pollution measures, including source control requirements, site design and treatment requirements and prevention consistent with the requirements of the RWQCB.

4.10.1.2 *Existing Conditions*

Hydrology and Drainage

Los Altos is in the Lower Peninsula Watershed, a 98-square-mile area whose creeks feed into the San Francisco Bay. There are four creeks located within the City of Los Altos, including Adobe Creek, Stevens Creek, Permanente Creek, and Hale Creek.⁴³ The nearest creek to the project site is Adobe

⁴² Valley Water. 2021 *Groundwater Management Plan, Santa Clara and Llagas Subbasins*. November 2021.

⁴³ City of Los Altos. "Local Creeks." Accessed December 19, 2025. <https://www.losaltosca.gov/461/Local-Creeks>.

Creek, which is approximately 50 feet north of the project site.⁴⁴ The project site is located in the Adobe drainage basin which drains to Adobe Creek via a network of connecting stormwater pipes.⁴⁵

Groundwater

The project site is located in the Santa Clara Plain groundwater subbasin.⁴⁶ Groundwater on-site was encountered at depths ranging from 10 to 15 feet bgs.⁴⁷ Water levels on-site may vary depending on seasonal precipitation, irrigation practices, and other climate conditions.

Flooding

The effective FEMA map shows the project 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.⁴⁸

An analysis of Adobe Creek in the vicinity of the site completed by Schaaf & Wheeler determined that the alignment of the creek in the County's 2020 Light Detection and Ranging (LIDAR) dataset differs from the alignment shown in the FEMA map. Schaaf & Wheeler completed a site visit in January 2024 and, utilizing GPS points, determined that the creek currently aligns with the LIDAR data and not the FEMA map. If the FEMA map were to be revised to match the LIDAR and GPS data, the Halsey House would not be located within a Regulatory Floodway or 100-year floodplain. It should be noted that, unless and until the FEMA map is revised through FEMA's Letter or Map Revision (LOMR) process, which requires an application to FEMA and hydrologic modeling to support the change, the Halsey House will remain mapped within a Regulatory Floodway and 100-year floodplain.

Seiches and Tsunamis

A seiche is defined as a standing wave generated by rapid displacement of water within an enclosed body of water (such as a reservoir, lake, or bay) due to an earthquake that triggers land movement within the water body or land sliding into or beneath the water body. There are no landlocked bodies of water near the project site that would affect the site in the event of a seiche.

A tsunami is a large tidal wave caused by an underwater earthquake or volcanic eruption. Tsunamis affecting the Bay Area can result from offshore earthquakes within the Bay Area. Los Altos is located five to six miles from the San Francisco Bay with an elevation of 150 feet or more above sea

⁴⁴ Valley Water. "Map of District Creeks." Accessed December 19, 2025.
<https://valleywater.maps.arcgis.com/apps/instant/nearby/index.html?appid=3f6d541471544eea8bf27a3259ec0384&sliderDistance=1>

⁴⁵ City of Los Altos. *Stormwater Master Plan Appendix A: Drainage Basins*. April 2016.

⁴⁶ Valley Water. 2021 Groundwater Management Plan, Santa Clara and Llagas Subbasins. November 2021. Figure 1.2 Topography of the Santa Clara and Llagas Subbasins.

⁴⁷ Cornerstone Earth Group. *Geotechnical Investigation Halsey House*. February 2024. Page 4.

⁴⁸ Schaaf & Wheeler. *Halsey House CEQA Hydrology Memorandum*. March 2024. Page 3.

level. Tsunami water waves hazards are not likely due to the distance of the city from the San Francisco Bay.⁴⁹

4.10.2 Impact Discussion

For the purpose of determining the significance of the project's impact on hydrology and water quality, would the project:

- 1) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
- 2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
- 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:
 - result in substantial erosion or siltation on- or off-site;
 - substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
 - create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
 - impede or redirect flood flows?
- 4) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
- 5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

4.10.2.1 Project Impacts

-
- a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
-

Demolition activities have the potential to result in temporary impacts to surface water quality in adjacent waterways. When soil disturbance occurs, sediments may be dislodged and discharged into the storm drainage system when surface runoff flows across the site. The proposed project would disturb approximately 0.3 acres, which is below the one-acre threshold requiring compliance with the NPDES Construction General Permit. During demolition, the project would implement Standard Conditions of Approval requiring BMPs to control erosion of exposed soil surfaces, which

⁴⁹ City of Los Altos. *Initial Study/Mitigated Negative Declaration for the Los Altos General Plan Update*. November 2002. Page 30.

would prevent the discharge of stormwater pollutants. Post-demolition, there would be no increase in impervious surface area that would require stormwater runoff treatment controls. For these reasons, the project would not violate any water quality standards or waste discharge requirements. **(Less than Significant Impact)**

-
- b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
-

As described in Section 4.10.1.2 Existing Conditions, groundwater is present at 10 to 15 feet bgs. The project would only include demolition and would not introduce new development on the site. There would not be any ground-disturbing activities, such as excavation or trenching, extending to depths where groundwater could be encountered. Therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. **(Less than Significant Impact)**

-
- c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?
-

As discussed in Section 4.10.1.2 Existing Conditions, the site is currently mapped in a regulatory floodway and in Zone AE.

The project involves the demolition of the existing Halsey House, which would remove impervious surfaces and increase the pervious surface area on-site. This would result in a reduction in runoff volumes compared to existing conditions. The project, therefore, would not substantially alter the drainage pattern of the site or result in off-site flooding and the existing public storm drain system would continue to have capacity to treat runoff from the site, regardless of whether the site is considered to be located in a floodway or floodplain based on FEMA mapping or LIDAR/GPS data. **(Less than Significant Impact)**

-
- d) Would the project risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones?
-

As discussed in Section 4.10.1.2 Existing Conditions and Appendix F, the project site is currently mapped in a regulatory floodway and in Zone AE. Due to the project site's inland location and distance from large bodies of water (i.e., the Bay), it is not subject to seiche or tsunami hazards. No hazardous materials or other pollutants would be stored on-site post-demolition. Therefore, the project would not risk the release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. **(No Impact)**

- e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?
-

As described in Section 4.10.1.2 Existing Conditions, the project site is within the Santa Clara groundwater subbasin, and this subbasin has not been identified in the GMP as being overdrafted. Implementation of the project would not interfere with any actions set forth by Valley Water in its GMP in regard to groundwater recharge, transport of groundwater, and/or groundwater quality. In addition, as discussed under checklist question b), the project would not substantially decrease groundwater supplies or substantially interfere with groundwater recharge. For these reasons, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. **(Less than Significant Impact)**

4.10.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant hydrology and water quality impact?

The cumulative geographic area for hydrology is considered the Adobe drainage basin. The project would not involve redevelopment of existing developed and vacant sites with substantial impervious surfaces. The proposed project would increase pervious surfaces, therefore decreasing the amount of stormwater runoff from the project site and would implement Standard Conditions of Approval to reduce potential surface and groundwater quality impacts during demolition. However, any future projects in the City of Los Altos may result in the construction of new developments and impervious area. These cumulative projects in the City and within the Adobe drainage basin would be required to conform to applicable General Plan policies (e.g., Policy 3.1, Policy 3.3, and Policy 3.4), as well as all other applicable laws and regulations (e.g., NPDES and MRP) regarding stormwater runoff, infrastructure and flooding to ensure hydrology and water quality impacts are avoided or minimized. The existing policies and regulations would reduce the hydrology and water quality impacts of the proposed project and cumulative projects in the area. Therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant hydrology and water quality impact. **(Less than Significant Cumulative Impact)**

4.11 Land Use and Planning

4.11.1 Environmental Setting

4.11.1.1 *Regulatory Framework*

Local

Los Altos General Plan

The following policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating land use impacts and are applicable to the proposed project:

Policy	Description
LU4.6	Continue to review development proposals to ensure a balance between development rights and impacts on surrounding residential neighborhoods.

Los Altos Municipal Code

Title 14 of the LAMC contains the Zoning Code, where standards for growth and development in the City are codified. The Zoning Code is the primary tool for implementing the policies of the General Plan and addressing physical development standards and criteria for the City. Government Code Section 65860 requires municipalities to maintain consistency between their zoning ordinance and their adopted General Plan. One of the purposes of zoning is to implement the land use designations set forth in the General Plan. Although the two are distinct documents, the General Plan and Zoning Code are closely related, and state law mandates that zoning regulations be consistent with the General Plan maps and policies.

4.11.1.2 *Existing Conditions*

The project site has a General Plan land use designation of Parks and is within the Public and Community Facilities zoning district.

The Parks designation provides for publicly owned and dedicated parkland. Activities that may be developed include areas for active sports play, large multipurpose fields for community events, informal recreation, tot lots, picnic areas, multipurpose sports fields and courts, concessions, community event space, outdoor amphitheaters, maintenance/support facilities, and caretaker facilities. The maximum intensity of development is a floor area ratio (FAR) of 0.4:1. The anticipated development intensity for this land use designation is a FAR of 0.1:1.

The Public and Community Facilities zoning district is reserved for the construction, use, and occupancy of governmental, public utility, and educational buildings and facilities and other uses compatible with the semipublic character of the district. The following uses are permitted in this zoning district: all facilities owned, leased, or operated by the city, the county, the state, or the

United States of America; open space conservation areas; public schools; recycling facilities (small collection facilities and reverse vending machines); and uses which are determined by the city planner to be of the same general character. The district also allows for low-intensity, non-retail uses such as childcare facilities, educational uses, and recreational activities. For sites within this zoning district, the minimum site area shall be one acre for each of the conditional uses and no structure shall exceed two stories or 30 feet in height, whichever is lesser.

4.11.2 Impact Discussion

For the purpose of determining the significance of the project's impact on land use and planning, would the project:

- 1) Physically divide an established community?
- 2) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

4.11.2.1 *Project Impacts*

-
- a) Would the project physically divide an established community?
-

A physical division of an established community typically refers to the construction of a physical feature (such as a wall, roadway, or railroad tracks) or the removal of a means of access (such as a local roadway or bridge) that would impair mobility within an existing community or between communities.

The project site is located in a suburban neighborhood surrounded by single-family residences and the Preserve. The project would demolish the Halsey House and leave the site vacant. The project would not construct physical features or close an existing street that would impair mobility. The project, therefore, would not physically divide an established community. **(No Impact)**

-
- b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?
-

The project consists of the demolition of the Halsey House. The project would not construct any buildings or structures, nor would it change the existing General Plan designation or zoning district.

General Plan policies CDHR 6.1 and 6.2 (listed in Section 4.5 Cultural Resources) require preservation of historic structures and require the City to regard demolition as a last resort. Per General Plan policy CDHR 6.2, demolition of a historic structure can only be permitted after the City determines that the resource has lost its physical integrity, retains no reasonable economic use, that demolition is necessary to protect health, safety, and welfare, or that demolition is necessary

to proceed with a new project where the benefits of the new project outweigh the loss of the historic resource.

As discussed in Section 4.5 Cultural Resources and throughout this EIR, the proposed project would result in a significant unavoidable impact through demolition of a CRHR eligible property and City Historic Landmark. However, the project would be consistent with General Plan policies CDHR 6.1 and 6.2 because the primary objective of the project is to protect the health, safety, and welfare of the surrounding community by eliminating safety hazards associated with the Halsey House building, which is currently vacant and in a state of disrepair. Therefore, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **(No Impact)**

4.11.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant land use and planning impact?

The geographic area for cumulative land use impacts is Los Altos. The Library Courtyard project and Adobe Sewer Replacement Project would be subject to the same Standard Conditions of Approval as the proposed project to reduce impacts. The project does not propose any development and would not result in any land use impacts. Therefore, the proposed project would not result in a cumulatively considerable contribution to a cumulatively significant land use and planning impact. **(No Cumulative Impact)**

4.12 Mineral Resources

4.12.1 Environmental Setting

4.12.1.1 *Regulatory Framework*

State

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act (SMARA) was enacted by the California legislature in 1975 to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining to public health, property, and the environment. As mandated under SMARA, the State Geologist has designated mineral land classifications in order to help identify and protect mineral resources in areas within the state subject to urban expansion or other irreversible land uses which would preclude mineral extraction. SMARA also allowed the State Mining and Geology Board, after receiving classification information from the State Geologist, to designate lands containing mineral deposits of regional or statewide significance.

4.12.1.2 *Existing Conditions*

The City of Los Altos exists on the very deep alluvial soils in the Santa Clara Valley formed from erosion of the nearby Santa Cruz Mountains to the west. As a result of this process, the topography of the project area is relatively flat and there are no significant mineral resources within the City of Los Altos.⁵⁰

4.12.2 Impact Discussion

For the purpose of determining the significance of the project's impact on mineral resources, would the project:

- 1) Result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state?
- 2) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

⁵⁰ City of Los Altos. *Los Alto General Plan 2020 Initial/Mitigated Negative Declaration*. November 2002. Page 32.

4.12.2.1 *Project Impacts*

- a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state?
-

- b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?
-

There are no identified mineral resources or mineral resources recovery sites located on-site. Therefore, the project would not result in the loss of availability of a mineral resource or the loss of a locally important mineral resource recovery site. **(No Impact)**

4.12.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant mineral resources impact?

As mentioned previously, the project site is not located within an area containing known mineral resources, and no mineral resources are located in the City of Los Altos. Therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant mineral resources impact. **(No Cumulative Impact)**

4.13 Noise

4.13.1 Environmental Setting

4.13.1.1 *Regulatory Framework*

4.13.1.2 *Background Information*

Noise

Factors that influence sound as it is perceived by the human ear, include the actual level of sound, period of exposure, frequencies involved, and fluctuation in the noise level during exposure. Noise is measured on a decibel scale, which serves as an index of loudness. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness. Because the human ear cannot hear all pitches or frequencies, sound levels are frequently adjusted or weighted to correspond to human hearing. This adjusted unit is known as the A-weighted decibel, or dBA.

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq} , DNL, or CNEL.⁵¹ These descriptors are used to measure a location's overall noise exposure, given that there are times when noise levels are higher (e.g., when a jet is taking off from an airport or when a leaf blower is operating) and times when noise levels are lower (e.g., during lulls in traffic flows on freeways or in the middle of the night). L_{max} is the maximum A-weighted noise level during a measurement period.

Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Vibration amplitude can be quantified using Peak Particle Velocity (PPV), which is defined as the maximum instantaneous positive or negative peak of the vibration wave. PPV has been routinely used to measure and assess ground-borne construction vibration. Studies have shown that the threshold of perception for average persons is in the range of 0.008 to 0.012 inches/second (in/sec) PPV.

⁵¹ L_{eq} is a measurement of average energy level intensity of noise over a given period of time. Day-Night Level (DNL) is a 24-hour average of noise levels, with a 10 dB penalty applied to noise occurring between 10:00 PM and 7:00 AM. Community Noise Equivalent Level (CNEL) includes an additional five dB applied to noise occurring between 7:00 PM and 10:00 PM. Where traffic noise predominates, the CNEL and DNL are typically within two dBA of the peak-hour L_{eq} .

4.13.1.3 Regulatory Framework

Federal

Federal Transit Administration Vibration Limits

The Federal Transit Administration (FTA) has developed vibration impact assessment criteria for evaluating vibration impacts associated with transit projects. The FTA has proposed vibration impact criteria based on maximum overall levels for a single event. The impact criteria for groundborne vibration are shown in Table 4.13-1 below. These criteria can be applied to development projects in jurisdictions that lack vibration impact standards.

Table 4.13-1: Groundborne Vibration Impact Criteria

Land Use Category	Groundborne Vibration Impact Levels (VdB inch/sec)		
	Frequent Event	Occasional Events	Infrequent Events
Category 1: Buildings where vibration would interfere with interior operations	65	65	65
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime use	75	78	83

Source: Federal Transit Administration. *Transit Noise and Vibration Assessment Manual*. September 2018.

State and Local

Los Altos General Plan

The following policies in the City's General Plan have been adopted for the purpose of reducing or avoiding impacts related to noise, and are applicable to the project:

Policy	Description
NEH 7.9	Minimize stationary noise sources and noise emanating from construction activities.

Los Altos Municipal Code

Chapter 6.16 of the LAMC contains standards and regulations to control unnecessary, excessive, and annoying noise and vibration within the City. Specifically, Section 6.16.50 of the LAMC establishes exterior noise limits for various zoning districts as shown in Table 4.13-2.

Table 4.13-2: Exterior Noise Limits

Receiving Land Use Category	Time Period	Noise Level (dBA) ¹
All R1 Zoning Districts	10:00 PM – 7:00 AM	45
	7:00 AM – 10:00 PM	55
All R3 Zoning Districts	10:00 PM – 7:00 AM	50
	7:00 AM – 10:00 PM	55
All R3 Zoning Districts	10:00 PM – 7:00 AM	55
	7:00 AM – 10:00 PM	60
All OA Zoning Districts	10:00 PM – 7:00 AM	60
	7:00 AM – 10:00 PM	65

¹ Levels not to be exceeded more than 30 minutes in any hour.

The LAMC prohibits the production of noise on one property that would (i) exceed the noise standard on any other property for a cumulative period of more than thirty minutes in any hour; (ii) exceed the noise standard plus five dB on any other property for a cumulative period of more than fifteen minutes in any hour; (iii) exceed the noise standard plus 10 dB on any other property for a cumulative period of more than five minutes in any hour; (iv) exceed the noise standard plus 15 dB on any other property for a cumulative period of more than one minute in any hour; or (vi) exceed the noise standard plus 20 dB or the maximum measured ambient on any other property for any period of time.

The City's LAMC states that if the measured ambient level exceeds the maximum permissible noise level within any of the first four noise limit categories, the allowable noise exposure standard shall be increased in five dB increments in each category as appropriate to encompass or reflect such ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level. If the noise measurement occurs on a property adjacent to a zone boundary, the noise level limit applicable to the lower noise zone, plus five dB is the applicable noise limit.

To ensure that unnecessary or excessive noise disturbances from specific activities and equipment are avoided, the Noise Control Ordinance sets noise thresholds for musical instruments, loudspeakers, loading and unloading, construction and demolition, and air-conditioning equipment (Section 6.16.070 of the LAMC). Exceeding those thresholds is considered a prohibited act and would constitute a violation of the Ordinance.

4.13.1.4 *Existing Conditions*

The project site is currently developed with the Halsey House, which is vacant and does not generate any noise. Surrounding land uses include single-family residences to the north, south, and east. The nearest residence is approximately 140 feet southwest of the Halsey House. The primary noise sources in the project vicinity include vehicular traffic along University Avenue and occasional aircraft flyovers.

4.13.2 Impact Discussion

For the purpose of determining the significance of the project's impact on noise, would the project result in:

- 1) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- 2) Generation of excessive groundborne vibration or groundborne noise levels?
- 3) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

4.13.2.1 *Thresholds of Significance*

A significant impact would be identified if project construction would result in a substantial temporary increase in ambient noise levels at sensitive receivers in excess of the local noise standards contained in the Los Altos General Plan or LAMC, as follows:

- **Temporary Noise Increase.** A significant temporary noise impact would be identified if construction would occur outside of the hours specified in the LAMC or if construction noise levels were to exceed the City's construction noise limits at adjacent noise sensitive land uses. Construction occurring during allowable hours is limited to 75 dBA in single-family residential areas (all R1 Zoning Districts), 80 dBA in multi-family residential areas (all R3 Zoning Districts), and 85 dBA in commercial areas (all OA and C Zoning Districts).

The City of Los Altos does not specify a construction vibration limit. For structural damage, Caltrans recommends a vibration limit of 0.5 in/sec PPV for new residential and modern commercial/industrial structures, 0.3 in/sec PPV for older residential structures, and a limit of 0.25 in/sec PPV for historic and some old buildings. The nearest residence, 140 feet southwest of the Halsey House, was constructed in 1949.⁵² The 0.3 in/sec PPV vibration limit would be applicable to properties in the vicinity of the project site.

⁵² Zillow. "13390 Lennox Way, Los Altos Hills, CA 94022." Accessed December 19, 2025.
https://www.zillow.com/homedetails/13390-Lennox-Way-Los-Altos-Hills-CA-94022/19527413_zpid/.

4.13.2.2 *Project Impacts*

- a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
-

The project would result in a temporary noise increase during demolition. There would be no sources of permanent noise because there would be no operational activities or sources post-demolition. The demolition activities would last three months and include a limited amount of equipment (excavator, bulldozer, and track loader). All noise would cease upon completion of the demolition. During demolition, the project would implement the following construction-related measures as Standard Conditions of Approval to reduce temporary demolition noise.

Standard Conditions of Approval:

- **Work Hours/Construction Site Signage:** No work shall commence on the job site prior to 7:00 a.m. nor continue later than 5:30 p.m., Monday through Friday, from 9 a.m. to 3 p.m. Saturday, and no work is permitted on Sunday or any City observed holiday.
- **Disturbance Coordinator:** Designate a “disturbance coordinator” who shall be responsible for responding to any local complaints regarding construction noise. The coordinator (who may be an employee of the general contractor) will determine the cause of the complaint and will require reasonable measures warranted to correct the problem be implemented. A telephone number of the noise disturbance coordinator shall be conspicuously posted at the construction site fence and on the notification sent to neighbors adjacent to the site. The sign must also list an emergency after-hours contact number for emergency personnel.
- **Construction Noise Reduction:** The following noise reduction measures shall be incorporated into construction plans and contractor specifications to reduce the impact of temporary construction-related noise on nearby properties:
 - Comply with manufacturer’s muffler requirements on all construction equipment engines;
 - Turn off construction equipment when not in use, where applicable;
 - Locate stationary equipment as far as practical from receiving properties;
 - Shroud or shield impact tools and use electric-powered rather than diesel-powered construction equipment.

The above Standard Conditions of Approval would reduce temporary demolition noise levels to less than significant. **(Less than Significant Impact)**

-
- b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?
-

As mentioned in Section 4.13.1.4 Existing Conditions, the nearest structure is a single-family residence approximately 140 feet southwest of the disturbance area. The residence was constructed in 1949 and is, therefore, subject to the 0.3 in/sec PPV threshold for older residential structures. Demolition activities may generate perceptible vibration when heavy equipment or impact tools (e.g., jackhammers, hoe rams) are used in the vicinity of nearby sensitive land uses. Table 4.13-3 shows the vibration levels generated by typical construction and demolition equipment at 25 and 50 feet.

Table 4.13-3: Vibration Levels for Typical Construction Equipment

Equipment		PPV at 25 feet (in/sec)	PPV at 50 feet (in/sec)
Clam shovel drop		0.202	0.094
Hydromill (slurry wall)	in soil	0.008	0.001
	in rock	0.017	0.002
Vibratory roller		0.210	0.099
Hoe Ram		0.089	0.004
Large bulldozer		0.089	0.004
Caisson drilling		0.089	0.004
Loaded trucks		0.076	0.036
Jackhammer		0.035	0.016
Small bulldozer		0.003	0.001

Source: Federal Transit Administration, Office of Planning and Environment, U.S. Department of Transportation. *Transit Noise and Vibration Impact Assessment Manual*. September 2018.

Based on the type of equipment to be used (e.g., excavator, bulldozer, track loader, and trucks) and the distance of the nearest structure, the project would not generate vibration levels that would exceed the recommended Caltrans vibration limit of 0.3 in/sec PPV. Therefore, the project would not result in the generation of excessive groundbourne vibrations or groundbourne noise levels.
(Less than Significant Impact)

-
- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
-

The project site is not located within two miles of a public airport or in the vicinity of a private airstrip. Therefore, the project would not expose people residing or working in the project area to excessive aircraft noise levels. **(No Impact)**

4.13.2.3 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant noise impact?

The geographic area for cumulative noise and vibration impacts is the project site and immediate vicinity. Cumulative projects within 1,000 feet of the project site could contribute to the same noise impacts as the proposed projects. The Library Courtyard project is over a half mile away and is outside of the geographic area for this impact. Construction of the Adobe Creek Sewer project may occur at the same time as demolition of the Halsey House, such that construction-related noise impacts could occur simultaneously. However, all projects are required to incorporate noise and vibration reduction measures as identified in the City's General Plan (Policy 7.1 through 7.10) and LAMC. For these reasons, the project would not result in a cumulatively considerable contribution to cumulatively significant noise or vibration impacts. **(Less than Significant Cumulative Impact)**

4.14 Population and Housing

4.14.1 Environmental Setting

4.14.1.1 *Regulatory Framework*

Housing-Element Law

State requirements mandating that housing be included as an element of each jurisdiction's general plan is known as housing-element law. The Regional Housing Need Allocation (RHNA) is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its housing element. California housing-element law requires cities to: 1) zone adequate lands to accommodate its RHNA; 2) produce an inventory of sites that can accommodate its share of the RHNA; 3) identify governmental and non-governmental constraints to residential development; 4) develop strategies and a work plan to mitigate or eliminate those constraints; and 5) adopt a housing element and update it on a regular basis.⁵³ The City of Los Altos Housing Element and related land use policies were last updated in August 2023.⁵⁴

Regional and Local

4.14.1.2 *Existing Conditions*

As of May 2025, the City of Los Altos had a total population of approximately 31,553 residents.⁵⁵ The project site is developed with the Halsey House, which has been vacant since 2008 and has not been utilized as a residence since 1974.

4.14.2 Impact Discussion

For the purpose of determining the significance of the project's impact on population and housing, would the project:

- 1) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- 2) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

⁵³ California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed December 19, 2025. <https://www.hcd.ca.gov/planning-and-community-development/housing-elements>

⁵⁴ City of Los Altos. 6th Cycle Housing Element 2023-2031. Adopted January 2023, revised August 2023. <https://www.losaltosca.gov/DocumentCenter/View/286/6th-Cycle-Los-Altos-Housing-Element-2023-to-2031-PDF>.

⁵⁵ State of California Department of Finance. "E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2021-2025." May 2025. Accessed December 19, 2025. <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/>

4.14.2.1 *Project Impacts*

- a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
-

The proposed project is the demolition of the vacant Halsey House. The project would not include any housing units or extend any roadways or other infrastructure. Therefore, the project would not induce any substantial unplanned population growth in the area. **(No Impact)**

- b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?
-

The Halsey House is vacant and does not house any residents. Therefore, implementation of the project would not displace existing residents from the project site that would necessitate construction of replacement housing elsewhere. **(No Impact)**

4.14.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant population and housing impact?

The geographic area for cumulative population and housing impacts is the City of Los Altos. The project would not be a residential or employment-generating use. For this reason, the project would not result in a cumulatively considerable contribution to a cumulatively considerable significant population and housing impact. **(No Cumulative Impact)**

4.15 Public Services

4.15.1 Environmental Setting

4.15.1.1 *Regulatory Framework*

City of Los Altos General Plan

The following policies in the City's General Plan have been adopted for the purpose of avoiding or reducing public services impacts and are applicable to the project:

Policy	Description
OSCCF 1.4	Require park dedication, public open space, or require fees in lieu thereof, for all new subdivisions and multi-family residential development in Los Altos.
OSCCF 6.1	Promote community order by preventing criminal activity, enforcing laws, and meeting the community service demands.
OSCCF 6.3	Promote response times for police and fire protection services emergencies that are comparable to similar jurisdictions in Santa Clara County.
OSCCF 6.4	Continue cooperative mutual aid agreements with nearby jurisdictions to ensure rapid and sufficient response to emergency situations.
OSCCF 9.2	Work with private developers to offer cultural activities within the community, such as a community theater and cinema.

Los Altos Parks Plan

The Los Altos Parks Plan, adopted in May of 2012, is intended to create a clear set of goals, policies, and objectives that will provide direction to the City Council and City staff for the development, improvement, and enhancement of the City's park system for the next twenty to thirty years. The Parks Plan was designed to parallel the General Plan's Open Space, Conservation, and Facilities Element by providing specific direction and recommendations related to parks in Los Altos.

4.15.1.2 *Existing Conditions*

Fire and Police Protection Services

The City of Los Altos contracts with the Santa Clara County Fire District for fire and emergency medical services.⁵⁶ There are two fire stations in Los Altos: Almond Fire Station located at 10 Almond Avenue and Loyola Fire Station located at 765 Fremont Avenue. The nearest station to the project site is the Almond Fire Station, located approximately 1.2 miles northeast.

⁵⁶ City of Los Altos. "Fire." Accessed December 19, 2025. <https://www.losaltosca.gov/358/Fire>.

Police protection services for the project site are provided by the Los Altos Police Department, headquartered at 1 North San Antonio Road, approximately one mile northeast of the project site. The Department has 32 sworn officers and 14 professional support staff.⁵⁷

Schools

Residents in Los Altos could attend school in the following districts: Los Altos School District, Cupertino Union School District, Santa Clara County Office of Education, Mountain View Los Altos High School District, and Fremont Union High School District.⁵⁸

The project site is located in the Los Altos School District and the Mountain View-Los Altos High School District. Elementary school students in the project area attend Gardner Bullis School, located approximately one mile northwest of the project site. Middle school students in the project area attend Egan Junior High School located approximately two miles north of the project site. High School students in the project area attend Los Altos High School, located approximately 1.5 miles northeast of the project site.

Parks

The City provides and maintains developed parkland and open space to serve its residents. Residents of Los Altos are served by community park facilities, neighborhood parks, playing fields, and community centers. The City's Parks and Recreation Department is responsible for development, operation, and maintenance of all City park facilities. The City has 18 different park and recreational facilities available for public use.⁵⁹

The project site is located within the Preserve. The Halsey House was most recently used as a nature center where educational and recreational programs were conducted for children. The Halsey House has been closed since 2008 due to health and safety code concerns. Shoup Park is approximately 400 feet north of the project site.

Libraries

The City of Los Altos is served by the Santa Clara County Library District. The nearest library to the project site is located at 13 South San Antonio Road, approximately one mile northeast of the project site.

⁵⁷ City of Los Altos. "About Us." Accessed December 19, 2025 <https://www.losaltosca.gov/262/About-Us>.

⁵⁸ City of Los Altos. "School Districts." Accessed December 19, 2025. <https://www.losaltosca.gov/462/School-Districts>.

⁵⁹ City of Los Altos. "Map of Parks." Accessed December 19, 2025. <https://www.losaltosca.gov/documentcenter/view/1950>.

Community Centers

There are two community centers located in Los Altos: Grant Park Community Center located at 1575 Holt Avenue, approximately four miles southeast of the project site, and Los Altos Community Center located at 97 Hillview Avenue, approximately one mile northeast of the project site.

4.15.2 Impact Discussion

For the purpose of determining the significance of the project's impact on public services, would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

- 1) Fire protection?
- 2) Police protection?
- 3) Schools?
- 4) Parks?
- 5) Other public facilities?

4.15.2.1 *Project Impacts*

-
- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services?
-

-
- b) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services?
-

The project proposes to demolish the Halsey House. The project does not propose the construction or operation of a new building that would require increased fire or police protection services, construction of new fire or police protection facilities, or expansion of existing fire or police protection facilities. No new residents or employees would be generated by the project. Therefore, there would be no change to the acceptable service ratios, response times, or other performance objectives for fire and police protection services. The project would have no impact on fire or police protection services. **(No Impact)**

-
- c) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools?
-

The project proposes to demolish the Halsey House. The project would not result in population growth because the project would not generate new residents. Therefore, no new students would be generated. Project implementation would not impact existing school services or result in the need for new or physically altered schools in the project area. **(No Impact)**

- d) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks?
-

The project proposes to demolish the Halsey House. The project would not result in population growth because the project would not generate new residents. Demolition of the Halsey House would not change or hinder access to the Preserve. As discussed in Section 4.15.1.2 Existing Conditions, the Halsey House was used as an educational nature center until it closed in 2008. Since the Halsey House has not been an active public facility in 17 years, and there are other public facilities provided throughout the City, the proposed project would not constitute a significant loss of a public facility. Therefore, the project would not overburden existing park facilities or create the need for any new park facilities or adversely impact the physical condition of existing park facilities. **(No Impact)**

- e) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities?
-

The project proposes to demolish the Halsey House. The project would not result in population growth or result in the increased use of local libraries or community centers. The project would not generate new residents or employees. The project would not create the need for or adversely impact the physical condition of existing library or community center facilities. **(No Impact)**

4.15.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant public services impact?

The geographic area for cumulative public services impacts is the City of Los Altos. The proposed project would not result in new residents or employees in Los Altos and, as a result, would have no impact on fire or police protection services, schools, parks, or other recreational facilities. Therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant public services impact. **(No Cumulative Impact)**

4.16 Recreation

4.16.1 Environmental Setting

4.16.1.1 *Regulatory Framework*

Los Altos General Plan

The following policies in the City's General Plan have been adopted for the purposes of avoiding or reducing recreation impacts and are applicable to the project:

Policy	Description
OSCCF 1.4	Require park dedication, public open space, or require fees in lieu thereof, for all new subdivisions and multi-family residential development in Los Altos.
OSCCF 4.1	Provide adequate level of maintenance for City parks, open space, and public property to ensure safety, aesthetics, and recreational enjoyment for Los Altos residents.

Los Altos Parks Plan

The Los Altos Parks Plan, adopted in May of 2012, is intended to create a clear set of goals, policies, and objectives that will provide direction to the City Council and City staff for the development, improvement, and enhancement of the City's park system for the next twenty to thirty years. The Parks Plan was designed to parallel the General Plan's Open Space, Conservation, and Facilities Element by providing specific direction and recommendations related to parks in Los Altos.

4.16.1.2 *Existing Conditions*

The City of Los Altos' Department of Recreation and Community Services is responsible for maintaining various parks and recreation facilities, as well as managing special interest programs and classes, senior programs, and community events. Overall, the City maintains a total of 19 parks, nature preserves, gyms, youth centers, and community centers that serve the community.

As described in Section 4.15 Public Services, nearby recreational facilities include the Preserve (which the Halsey House is in) and Shoup Park.

4.16.2 Impact Discussion

For the purpose of determining the significance of the project's impact on recreation:

- 1) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- 2) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

4.16.2.1 *Project Impacts*

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
-

The project proposes to demolish the Halsey House, which is currently vacant and unused. The project would not generate new residents or employees and would not increase demand for local park and recreational facilities. For this reason, the proposed project would not result in the need for new or physically altered parks in the project area. **(No Impact)**

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?
-

The demolition of the existing Halsey House would not require the construction or expansion of recreational facilities. The Preserve, where the Halsey House is located, would remain unchanged. The project would not include new or expanded recreational facilities that would have an adverse physical effect on the environment. **(No Impact)**

4.16.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant recreation impact?

The geographic area for cumulative park/recreational facility impacts is the City of Los Altos. The proposed project would demolish the Halsey House and would not include new residences. There would be no increase in park use such that physical deterioration would occur. Therefore, the project would have no cumulative impacts to recreational facilities. **(No Cumulative Impact)**

4.17 Transportation

4.17.1 Environmental Setting

4.17.1.1 *Regulatory Framework*

State

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires analysis of VMT in determining the significance of transportation impacts. Local jurisdictions were required by OPR to implement a VMT policy by July 1, 2020.

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. CEQA Guidelines Section 15064.3(b)(1) describes factors that might indicate whether a development project's VMT may be significant. Notably, projects located within 0.5 mile of transit should be considered to have a less than significant transportation impact based on OPR guidance.

Local

Los Altos General Plan

The following policies in the City's General Plan have been adopted for the purpose of reducing or avoiding impacts related to transportation and traffic and are applicable to the proposed project.

Policy	Description
CE 2.17	Maintain adequate emergency access for all land uses.
CE 2.20	Enhance driving safety in the community.

Los Altos Complete Streets Master Plan

The Complete Streets Master Plan (CSMP) was adopted in 2022 and is intended to build from the Bicycle and Pedestrian Master Plans that were previously adopted by the City. The CSMP provides recommendations and strategies for developing a comprehensive bicycle and pedestrian network that facilitates easy and safe circulation throughout the City. The CSMP outlines the existing conditions in the City, recommends improvements for the existing infrastructure, provides the Safe Routes to School Plan, and describes a strategy for evaluating and prioritizing suggested improvements.

Los Altos VMT Policy

SB 743 requires local jurisdictions to implement a VMT policy that can utilize analysis of VMT for proposed projects to determine the significance of transportation impacts. In February 2023, the Los Altos City Council adopted a VMT policy that establishes screening criteria to identify projects.

4.17.1.2 *Existing Conditions*

Roadway Network

Regional access to Los Altos is provided by SR 85 and I-280. Local access to the project site is provided by Foothill Expressway and University Avenue.

Bicycle Facilities

Bicycle facilities within the vicinity of the project site consist of separated bike lanes, bike routes, and bike lanes. These facilities are described in detail below.

- Class III Bike Route⁶⁰ along Lincoln Avenue and University Avenue between South El Monte Avenue and Fremont Road
- Class II Bicycle Lane along South San Antonio Road between Lincoln Avenue and El Camino Road
- A bike/pedestrian connector off University Avenue providing direct access to Shoup Park

Pedestrian Facilities

Existing pedestrian facilities within the project vicinity include sidewalks and crosswalks. Sidewalks are present on University Avenue from South El Monte Avenue to Burke Road/Main Street.⁶¹ There is a pedestrian path off of University Avenue that provides direct access to the Preserve.

Transit Facilities

Existing bus transit service to the project area is provided by VTA and the City of Los Altos. VTA bus routes 40 and 52 serve the project area.⁶² Bus Route 40 provides service from Foothill College and Los Altos to the Mountain View Transit Center via Rengstorff Avenue and North Shoreline

⁶⁰ A Class I classification is for multi-use paths that provide a completed separated right of way for the exclusive use of bicycles and pedestrians with cross flow minimized. A Class II classification is for bike lanes that provide a striped lane for one-way bike travel on a street or highway. A Class III classification includes bike route signed shared roadways that provide signage for bike routes on a roadway shared with motor vehicle traffic and pedestrian. Source: City of Los Altos. *City of Los Altos Bicycle Transportation Plan*. April 10, 2012. Page 3-15.

⁶¹ City of Los Altos. *City of Los Altos Pedestrian Master Plan*. August 2015. Page 3-14.

⁶² Valley Transportation Authority. "System Map." October 30, 2023. Accessed December 19, 2025.
<https://www.vta.org/sites/default/files/2023-10/System-Map-103023.pdf>.

Boulevard.⁶³ Bus Route 52 provides service from Foothill College and Los Altos to Mountain View Transit center via El Monte.⁶⁴

4.17.2 Impact Discussion

For the purpose of determining the significance of the project's impact on transportation, would the project:

- 1) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?
- 2) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
- 3) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- 4) Result in inadequate emergency access?

4.17.2.1 Project Impacts

-
- a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?
-

The project proposes to demolish the Halsey House. The project does not include construction of any buildings or structures. As such, the project would not generate any new trips. The roadway system, bicycle facilities, pedestrian facilities, and transit facilities would remain unchanged post-demolition of the Halsey House. Therefore, the project would have no impact on any program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities. **(No Impact)**

-
- b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
-

The project would not be inconsistent with the CEQA Guidelines Section 15064.3 subdivision (b) because it would not generate any VMT.⁶⁵ Therefore, the project would have no VMT impact. **(No Impact)**

⁶³ Valley Transportation Authority. "40 Local Schematic Map." Effective August 14, 2023. Accessed December 19, 2025. <https://www.vta.org/go/routes/40>.

⁶⁴ Valley Transportation Authority. "52 Local Schematic Map." Effective August 14, 2023. Accessed December 19, 2025. <https://www.vta.org/go/routes/52>.

⁶⁵ The trucks traveling to and from the site during demolition would have VMT but travel for construction is temporary and not considered a source of permanent VMT.

-
- c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
-

The project proposes to demolish the Halsey House. As discussed in Section 3.3 Project Description, the site can only be accessed via a pedestrian bridge that has an eight-ton weight capacity and 10-foot width constraint. An analysis completed by a structural engineer in December 2025, which included inspections of the bridge and a load rating assessment, determined that the bridge is in good condition and confirmed the eight-ton weight limit.⁶⁶ The service utility trucks and track loaders used for demolition would weigh a maximum of seven tons. Additionally, other equipment used for demolition activities would be small and lightweight, consisting primarily of hand tools. As such, no hazards would be created during demolition activities.

Further, the proposed project does not include construction of any buildings or structures. As discussed in checklist question a), the project would not include any roadway features, bike facilities, or pedestrian facilities. There would also be no new trips generated by the project, other than temporary trips during the demolition period. For these reasons, there would be no impacts related to geometric design features or incompatible uses. **(No Impact)**

-
- d) Would the project result in inadequate emergency access?
-

The project would also not hinder or block existing roadways used for emergency access during demolition. All construction staging would occur within the project site (refer to Figure 3.1-3 for the site disturbance area). For these reasons, the project would have no impact on emergency access. **(No Impact)**

4.17.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant transportation impact?

The geographic area for transportation impacts is the City of Los Altos. As discussed under checklist question a), the project would not be inconsistent with plans and policies addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities since no trips would be generated by the project. As discussed under checklist question b), the project would not generate any VMT; therefore, the project would not contribute to cumulative VMT in the region. As a result, the project would not result in a cumulatively considerable contribution to cumulative impacts in these areas. Additionally, the project would not create any transportation-related hazards or result in inadequate emergency access. For these reasons, the proposed project would not result in a cumulatively considerable contribution to a significant cumulative transportation impact. **(No Cumulative Impact)**

⁶⁶ CSG Consultants, Inc. Halsey House Bridge Crossing Structural Assessment Memorandum. December 2025.

4.18 Tribal Cultural Resources

4.18.1 Environmental Setting

Assembly Bill 52

AB 52, effective July 2015, established a new category of resources for consideration by public agencies 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 TCR, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a TCR or until 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 Resources, or
 - 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.

4.18.1.1 *Existing Conditions*

There are no known TCRs on the project site. As discussed in Section 4.5 Cultural Resources, the project site is potentially sensitive for archaeological resources due to its proximity to Adobe Creek.

4.18.2 Impact Discussion

For the purpose of determining the significance of the project's impact on tribal cultural resources, would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- 1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?
- 2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.18.2.1 *Project Impacts*

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?
-

As discussed in Section 4.5 Cultural Resources, a Sacred Lands File Search was conducted through the NAHC for the project site on March 1, 2024 and the search results were negative per a response received March 4, 2024. The City has provided notice of the proposed project to culturally affiliated tribes in August, 2024. No responses were received. Therefore, there are no known TCRs on-site.

Also as discussed in Section 4.5 Cultural Resources, the proposed project would be required to implement a Standard Condition of Approval to address any accidental disturbance of unknown cultural resources and set forth the appropriate procedure to be followed in the event of discovery and would reduce impacts to unrecorded subsurface cultural resources. Therefore, the proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed on local or state registers. **(Less than Significant Impact)**

- b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?
-

As discussed above under checklist question a), there are no known TCRs on-site and the project as proposed would not result in significant impacts to TCRs. **(Less than Significant Impact)**

4.18.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant tribal cultural resources impact?

The geographic study area for cumulative impacts to tribal cultural resources is the surrounding area. The cumulative projects listed in Table 4.0-1 may require excavation and grading or other activities that may affect tribal cultural resources. No cultural resources were identified in the project area; however, the project site is considered potentially sensitive for archaeological resources due to its proximity to Adobe Creek. The project and other cumulative projects would be required to implement Standard Conditions of Approval or mitigation measures that would avoid impacts and/or reduce them to a less than significant level consistent with CEQA and AB 52 requirements. These projects would also be subject to the federal, state, and county laws regulating archaeological resources and human remains. Therefore, the project in combination with other

cumulative projects would not result in a significant cumulative tribal cultural resources impact.
(Less than Significant Cumulative Impact)

4.19 Utilities and Service Systems

4.19.1 Environmental Setting

4.19.1.1 *Regulatory Framework*

State

State Water Code

Pursuant to the State Water Code, water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of an UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and contingency plans for drought events. California Water Service adopted its most recent UWMP for the Los Altos Suburban District in June 2021.⁶⁷

Assembly Bill 939

The California Integrated Waste Management Act of 1989, or AB 939, established the Integrated Waste Management Board, required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of solid waste generated (from 1990 levels), beginning January 1, 2000, and divert at least 75 percent by 2010. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

Regional and Local

Countywide Integrated Waste Management Plan

Pursuant to AB 939, solid waste facility compliance requires that each county prepare and adopt a Countywide Integrated Waste Management Plan. The Santa Clara County Integrated Waste Management Plan (CIWMP) was approved in 1996 and contains goals, policies, and objectives aimed to ensure an effective and efficient integrated waste management system. Public Resources Code Sections 41770 and 41822, and Title 24, California Code of Regulations Section 18788 require that each countywide or regional agency integrated waste management plan, and elements thereof, be reviewed, revised (if necessary), and submitted to CalRecycle every five years. The last review was completed in 2021 and concluded that despite population growth, solid waste diversion

⁶⁷ California Water Service. *2020 Urban Water Management Plan, Los Altos Suburban District*. June 2021.
https://www.calwater.com/docs/uwmp2020/LAS_2020_UWMP_FINAL.pdf

has increased, Santa Clara County has adequate disposal capacity (i.e., greater than 15 years), and no revisions to the CIWMP are warranted.⁶⁸

Los Altos General Plan

The following policies in the City's General Plan have been adopted for the purpose of avoiding or reducing impacts on utilities and service systems and are applicable to the project:

Policy	Description
IWD 4.1	Continue to work with infrastructure providers to ensure the community's current and future infrastructure needs are met.
IWD 4.3	Maintain accurate records of infrastructure usage and needed infrastructure improvements.

Los Altos Municipal Code

Chapter 6.14 of the LAMC details the City's requirements for disposing of solid waste that is generated during the demolition of existing structures and the construction of new buildings in the City. Projects that are valued at \$25,000 or more must divert at least 65 percent of the construction and demolition debris associated with the project from landfills in order to help the City achieve their overall waste diversion goal of 78 percent.

4.19.1.2 *Existing Conditions*

Water Supply

The project site is served by the California Water Service (Cal Water) and is located within Cal Water's Los Altos Suburban (LAS) District. Water supply for the project site is sourced from a combination of groundwater and purchased water. Approximately 21 percent of the LAS District's provided water comes from primary groundwater production and 79 percent comes from water purchases from the Valley Water, sourced from underground aquifers, reservoirs, and the San Joaquin-Sacramento River Delta. The LAS District system includes 297 miles of mains, 65 booster pumps, and 46 storage tanks.⁶⁹ The LAS District 2020 UWMP found that Cal Water has more than sufficient well capacity to meet the demands unserved by Valley Water purchases through 2045.

Sanitary Sewer/Wastewater Treatment

The City of Los Altos' Department of Public Works is responsible for the wastewater collection system within the City. Wastewater is conveyed to the Palo Alto Regional Water Pollution Control Plant (PARWQCP) for treatment and disposal. The PARWQCP serves the wastewater management

⁶⁸ California Department of Resources Recycling and Recovery. "Five-Year Countywide or Regional Agency Integrated Waste Management Plan Review Report Guidelines." Accessed December 19, 2025.
<https://calrecycle.ca.gov/lgcentral/library/policy/5yrreview/>.

⁶⁹ California Water Service. *2020 Urban Water Management Plan, Los Altos Suburban District*. June 2021.
https://www.calwater.com/docs/uwmp2020/LAS_2020_UWMP_FINAL.pdf.

needs of the communities of Palo Alto, Los Altos, Mountain View, East Palo Alto, Los Altos Hills, Stanford University, and East Palo Alto Sanitary District. The City owns and maintains the collection system within the City and its sphere of influence and the trunk sewer that connects the City to the PARWQCP master metering station.⁷⁰

The PARWQCP has an annual treatment capacity of 39 million gallons per day (mgd), with the municipalities of Los Altos, Mountain View, and Los Altos Hills estimated to generate 4,045 acre-feet per year, or 3.6 mgd of the plant's treatment capacity (nine percent). The PARWQCP currently receives approximately 17 mgd from all its customers.⁷¹ The PARWQCP, therefore, has approximately 22 mgd of treatment capacity available.

Storm Drainage

Runoff from the project site drains as sheet flow to Adobe Creek. Adobe Creek flows to San Francisco Bay.⁷²

Solid Waste

Solid waste collection in the City of Los Altos is provided by Mission Trail Waste Systems. Mission Trail Waste Systems provides residential, commercial, and industrial collection services for garbage, recycling, and organics for the City. Mission Trail Waste Systems operates a transfer station at 1313 Memorex Drive in Santa Clara. Solid waste generated in the City is disposed of at Newby Island Sanitary Landfill (NISL) in the City of San José. As of May 2023, Newby Island Landfill had approximately 12.4 million cubic yards of capacity remaining and an estimated closure year of 2035.⁷³

4.19.2 Impact Discussion

For the purpose of determining the significance of the project's impact on utilities and service systems, would the project:

- 1) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- 2) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

⁷⁰ City of Los Altos. "Public Works – Sanitary Sewer." Accessed December 19, 2025.
<https://www.losaltosca.gov/432/Sanitary-Sewer>.

⁷¹ California Water Service. *2020 Urban Water Management Plan, Los Altos Suburban District*. June 2021.
https://www.calwater.com/docs/uwmp2020/LAS_2020_UWMP_FINAL.pdf

⁷² City of Los Altos. "Stormwater Master Plan – Appendix A: Drainage Basins." Accessed December 19, 2025.
<https://www.losaltosca.gov/441/Stormwater-Master-Plan>.

⁷³ Boccaleoni, Anthony. Environmental Manager, Republic Services, Inc. Personal Communication. May 12, 2023.

- 3) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- 4) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- 5) Be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste?

4.19.2.1 *Project Impacts*

-
- a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
-

The project would demolish the Halsey House and would not construct any new structures. The site would be vacant post-demolition. Since no new structures would be constructed on-site, there would be no new connections to the City's water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. As a result, there would be no need for relocation, expansion, or construction of these facilities that could cause significant environmental effects. **(No Impact)**

-
- b) Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
-

The project would not construct a building or have operational activities that would require water or increase water demand. For these reasons, the proposed project would have no impact related to water supplies. **(No Impact)**

-
- c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
-

The project would not construct a building or have operational activities that would generate wastewater. For this reason, the project would have no impact related to wastewater generation in excess of the wastewater treatment provider's capacity. **(No Impact)**

-
- d) Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
-

The project would not construct a building or have operational activities that would generate solid waste. However, demolition of the existing building would result in debris that would need to be hauled to an appropriate off-site disposal location. The project would comply with Chapter 6.14 of the LAMC requiring that at least 65 percent of demolition debris be diverted from landfills. For this reason, the project would have no impact related to solid waste generation in excess of state or local standards. **(No Impact)**

- e) Would the project be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste?
-

As mentioned under checklist question d), the project would not generate any operational solid waste since it is limited to the demolition of Halsey House. Demolition debris would be hauled to an appropriate off-site disposal location, and 65 percent of debris would be diverted from landfills, as required by Chapter 6.14 of the LAMC. Therefore, the project would not conflict or be out of compliance with federal, state, or local management and reduction statutes and regulations related to solid waste because these regulations would not be applicable. There would be no impact. **(No Impact)**

4.19.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant utilities and service systems impact?

The geographic area for cumulative water supply, wastewater, and storm drainage systems is the City boundaries. The geographic area for electricity, natural gas, and telecommunication services is the State of California. As discussed above, the project would not have any impact on utility and service systems since the project would not connect to existing or create new utility infrastructure. The project would also not increase water usage or result in an incremental increase in wastewater or solid waste generation since no operational activities are proposed at the site. Therefore, the project would not result in a cumulatively considerable contribution to a significant utilities and service systems impact. **(No Cumulative Impact)**

4.20 Wildfire

4.20.1 Environmental Setting

4.20.1.1 *Regulatory Framework*

Fire Hazard Severity Zones

CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. Referred to as FHSZs, these maps influence how people construct buildings and protect property to reduce risk associated with wildland fires. FHSZs are divided into areas where the state has financial responsibility for wildland fire protection, known as SRAs, and areas where local governments have financial responsibility for wildland fire protection, known as LRA). Homeowners living in an SRA are responsible for ensuring that their property is in compliance with California's building and fire codes. Only lands zoned for very high fire hazard are identified within LRAs.

4.20.1.2 *Existing Conditions*

The project site is in an urban area surrounded by existing development. The project site is not located near wildlands that could present a fire hazard. The site is not located within an identified Very High Fire Hazard Severity Zone in an SRA or a LRA.⁷⁴

4.20.2 Impact Discussion

For the purpose of determining the significance of the project's impact on wildfire, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- 1) Substantially impair an adopted emergency response plan or emergency evacuation plan?
- 2) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- 3) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- 4) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

⁷⁴ California Department of Forestry and Fire Protection. "Fire Hazard Severity Zones." Accessed December 19, 2025. <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>.

4.20.2.1 *Project Impacts*

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. **(No Impact)**

4.20.2.2 *Cumulative Impacts*

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 cumulative wildfire impacts. **(No Cumulative Impact)**

Section 5.0 Growth-Inducing Impacts

Would the project foster or stimulate significant economic or population growth in the surrounding environment?

The CEQA Guidelines require that an EIR identify the likelihood that a proposed project could “foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment” (Section 15126.2[d]). This section of the EIR is intended to evaluate the impacts of such growth in the surrounding environment.

The project consists of demolition of an existing vacant structure with no new development proposed. Therefore, the project would not result in direct population growth, or in indirect growth due to new employment opportunities. The project would not remove any obstacles that would help facilitate additional growth that could significantly affect the physical environment, nor would it include the expansion of existing infrastructure that would facilitate growth in the project area or other areas of the City. Therefore, the project would not result in growth-inducing impacts beyond what was envisioned in the City’s General Plan. **(No Impact)**

Section 6.0 Significant and Irreversible Environmental Changes

Pursuant to CEQA Guidelines Section 15126.2(d), an EIR must identify significant irreversible environmental changes that would be caused by the proposed project being analyzed. Significant irreversible changes include the 1) irreversible use of nonrenewable resources, 2) commitment of future generations to similar use, and 3) irreversible damage resulting from environmental accidents associated with the project.

6.1 Irreversible Use of Nonrenewable Resources

Demolition of the Halsey House would require the use of nonrenewable resources and energy during the operation of demolition equipment and trucks. As described in Section 4.6 Energy under checklist question a), the project would minimize the use of nonrenewable resources like diesel fuel to be efficient, and would not use fuel wastefully due to expenses associated with demolition equipment. Also, the project site is within an urban area of Los Altos and can be easily accessed via roadways. The project would not have any operational phases that would consume energy. For these reasons, the project would minimize the use of nonrenewable resources.

6.2 Commitment of Future Generations to Similar Use

Demolition of the Halsey House would not commit resources to prepare the site or construct and operate a building. Removal of the existing structure would leave the site vacant. The proposed demolition would not result in other land use changes in the surrounding area. For these reasons, the project would not commit future generations to changes in land use.

6.3 Irreversible Damage Resulting from Environmental Accidents Associated with the Project

The project does not propose hazardous uses, and environmental accidents would not occur since no operation is proposed. As discussed in Section 4.9 Hazards and Hazardous Materials, there are no significant unmitigable hazards and hazardous materials conditions on-site or off-site that would substantially affect the public and surrounding environment. As described in Section 4.7 Geology and Soils, there are no significant unmitigable geology and soils impacts which would result from implementation of the project. For these reasons, the project would not result in irreversible damage that may result from environmental accidents.

Section 7.0 Significant and Unavoidable Impacts

A significant unavoidable impact is an impact that cannot be mitigated to a less than significant level if the project is implemented as it is proposed. The following significant and unavoidable impacts have been identified as resulting from the project:

- **Impact CUL-1:** Implementation of the proposed project would result in the demolition of the Halsey House, which is a historic resource.

Section 8.0 Alternatives

CEQA requires that an EIR identify and evaluate alternatives to a project as it is proposed. Two key provisions from the CEQA Guidelines pertaining to the discussion of alternatives are provided below:

Section 15126.6(a). Consideration and Discussion of Alternatives to the Proposed Project.

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Section 15126.6(b). Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if those alternatives would impede to some degree the attainment of the project objectives, or be more costly.

Other elements of the Guidelines discuss that alternatives should include enough information to allow a meaningful evaluation and comparison with the proposed project. The CEQA Guidelines state that if an alternative would cause one or more additional impacts, compared to the proposed project, the discussion should identify the additional impact, but in less detail than the significant effects of the proposed project. The CEQA Guidelines emphasize a commonsense approach – the alternatives should be reasonable, “foster informed decision making and public participation,” and focus on alternatives that avoid or substantially lessen the significant impacts. CEQA requires a range of alternatives necessary to permit a reasoned choice.

The three critical factors to consider in selecting and evaluating alternatives are, therefore: (1) the significant impacts from the proposed project which could be reduced or avoided by an alternative, (2) the project objectives, and (3) the feasibility of the alternatives available. These factors are discussed below. The following discussion is based, in part, on Relocation Feasibility Study prepared in July 2024 by Page & Turnbull and a Feasibility Study prepared in July 2021 by Architectural Resources Group.

8.1 Factors in Selecting Alternatives

8.1.1 Significant Impacts of the Project

As explained above, the CEQA Guidelines Section 15126.6 states that the alternatives analysis in an EIR should be limited to alternatives that are feasible and would avoid or substantially lessen any of the significant effects of the project and achieve most of the basic project objectives. Potentially significant environmental impacts that would result from the proposed project are evaluated in Section 4.0 Environmental Setting, Impacts, and Mitigation of this EIR. As discussed throughout this EIR, with implementation of mitigation measures and standard conditions of approval, many of the potentially significant impacts resulting from the project would be reduced to a less-than-significant level.

Impacts that would be mitigated to less than significant levels are summarized below.

- **Impact BIO-1:** Disturbance of the existing woodrat nests on-site could result in the destruction of nests and injury or mortality of individual woodrats.
- **Impact BIO-2:** Demolition of the structure on-site would disturb Townsend's big-eared bats roosting within the structure.
- **Impact HAZ-1:** Demolition of the existing building could expose construction workers or residents in the vicinity of the project site to harmful levels of ACMs or LBPs.

The following impact would remain significant and unavoidable with all feasible mitigation implemented.

- **Impact CUL-1:** Implementation of the proposed project would result in the demolition of the Halsey House, which is a historic resource.

8.1.2 Project Objectives

While CEQA does not require that alternatives must be capable of meeting all of the project objectives, their ability to meet most of the basic objectives is considered relevant to their consideration.

As identified in Section 3.4 Project Objectives, the objectives for the project are as follows:

1. Protect the health, safety, and welfare of the surrounding community by eliminating safety hazards associated with the Halsey House building, which is currently vacant and in a state of disrepair.
2. Maintain and improve public open space at the project site through restoration of landscaped areas and enhanced open space accessibility and visibility.
3. Reduce or eliminate ongoing maintenance costs associated with an unused public facility.

4. Reduce or eliminate the cost to rehabilitate the existing structure to a usable condition.
5. Comply with the Secretary of the Interior's Standards as necessary.

8.2 Project Alternatives

The City considered the following alternatives to the proposed project:

- No Project Alternative
- Preservation Alternative 1 – Relocation of Historic Resource Off-Site
- Preservation Alternative 2 – Full Rehabilitation of Historic Resource
- Preservation Alternative 3 – Partial Rehabilitation/Partial Demolition
- Preservation Alternative 4 – Mothballing

8.2.1 Feasibility of Alternatives

CEQA, the CEQA Guidelines, and case law interpreting CEQA and the CEQA Guidelines have found that feasibility can be based on a wide range of factors and influences. The CEQA Guidelines state that such factors can include (but are not necessarily limited to) the suitability of an alternate site, economic viability, availability of infrastructure, consistency with a general plan or with other plans or regulatory limitations, jurisdictional boundaries, and whether the project proponent can “reasonably acquire, control or otherwise have access to the alternative site (Section 15126.6[f][1]).”

8.2.2 Project Alternatives Evaluated

In addition to a “No Project” alternative, the CEQA Guidelines advise that the range of alternatives discussed in the EIR should be limited to those that “would avoid or substantially lessen any of the significant effects of the project” (Section 15126.6[f]). The discussion below addresses alternatives which could reduce project impacts and are feasible from a physical land use and infrastructure perspective. This Draft EIR does not evaluate the financial or economic feasibility of the alternatives presented.

8.2.2.1 *No Project Alternative*

The CEQA Guidelines [§15126(d)4] require that an EIR specifically discuss a “No Project” alternative, which shall address both “the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistent with available infrastructure and community services.” The No Project Alternative would retain the existing Halsey House as-is.

Comparison of Environmental Impacts

The No Project Alternative would avoid the project's mitigated and significant and unavoidable impacts because it would not change existing conditions.

Relationship to Project Objectives

The No Project Alternative would not meet any of the project objectives. The Halsey House would remain a health and safety issue, and the City would continue to spend funds to maintain an unused public facility.

Conclusion

The No Project Alternative would avoid the project's impacts but would not meet any of the project's objectives.

8.2.2.2 *Preservation Alternative 1 – Relocation of the Historic Resource Off-Site*

Under Preservation Alternative 1, the historic resource would be relocated to another location off-site. There would be no demolition of the Halsey House.

Historic buildings can be relocated in many circumstances, depending on structural condition, building materials, location, and the availability and suitability of a receiver site. A relocation feasibility study was prepared by Page & Turnbull (with a structural evaluation prepared by T&S Structural) in July 2024 (refer to Appendix G) to assess the feasibility and impact of relocating the Halsey House.

The most challenging aspect of relocation would be finding a suitable transportation route. Three routes were analyzed with the main constraint identified being the narrowness of the roadways available in relation to the geometry of the building. The three possible routes for relocation off-site would be (1) the main entrance to the Preserve; (2) the trail out of the Preserve onto Manresa Way, which is a private road; or (3) through an existing fence onto Manresa Way via Manresa Lane, which is also a private road. The possible routes would require the Halsey House to be divided into 14 or more sections for relocation and reassembly.⁷⁵

The first route option through the main entrance of the Preserve is limited because of the width and load capacity of the existing bridge over Adobe Creek, and the mature redwoods on either side of the route. This route would only accommodate a maximum section width of 14 feet and six inches. Some of the mature redwood trees may need to be cleared to accommodate the trucks transporting pieces of the Halsey House. In addition, if the residence were cut into the 14 or more sections necessary to accommodate the route width, each section would weigh approximately eight tons, and the necessary shoring beams and power dollies required for the move would add an additional seven tons of weight for a total load of approximately 15 tons. The load capacity of the existing bridge is approximately eight tons; therefore, a temporary bridge over the existing bridge would be required to accommodate the load of each section of the residence.

The second route option would require trimming and selective removal of the existing native plantings and mature trees along the trail and at key intersections, but overall could accommodate

⁷⁵ Page & Turnbull. *Halsey House Relocation Feasibility Study*. July 15, 2024. Page 5.

wider sections of up to 19 feet if the existing median features at the intersection of Manresa Way and University Ave were removed.

Finally, the third route option is limited by the width of the existing private community gates, which are substantial masonry structures, and would require transported sections to be no more than 50 feet wide.

Comparison of Environmental Impacts

The first route option described above would require construction of a temporary bridge to allow for larger width and load capacities. Based on the proximity of mature redwoods to the existing bridge, a temporary bridge large enough to accommodate the relocation would require removal of several mature redwoods.

Both the second and third options would require coordination with and approval from the gated community in addition to the typical local jurisdictional coordination, particularly for removal and trimming of site features along the route. Under all three options, relocation of the Halsey House would result in similar biological impacts as the proposed project, including removal of mature redwood trees, vegetation clearing, disturbance of woodrat nests, and potential indirect impacts on water quality. Mitigation measures MM BIO-1.1 through MM BIO-1.3 and MM BIO-2.1 identified for the proposed project would still need to be implemented to reduce these impacts to a less than significant level.

Further, the Halsey House is intrinsically linked with the Preserve due to the events associated with Emma Wright Halsey, Mori, and Yoshio. Moving the Halsey House would diminish its ties to the location and it would no longer be directly associated with the development of the park. Relocation of the Halsey House would also potentially compromise the setting and feeling associated with the residence as it is currently located in a secluded woodsy area away from the main throughfares, situated along Adobe Creek, and surrounded by redwood trees. A potential receiver site would need to have a comparable feeling and setting to the current site, which would include the natural setting (e.g., mature redwood and oak trees) and semi-rural feeling adjacent to a waterway. A receiver site would also need to replicate similar building setbacks (e.g., 200 feet or more) and relationship to the public right of way (e.g., orientation and distance). The City of Los Altos does not own a receiver site that could provide a similar setting and feeling as the Preserve. While Preservation Alternative 1 would avoid demolition of the Halsey House, moving it would diminish four of the seven aspects of the Halsey House's integrity including location, setting, feeling, and association. The loss of these aspects would result in a loss of historic integrity of the structure and, as such, would result in a significant unavoidable impact under CEQA.

The relocation feasibility study prepared by Page & Turnbull determined that while the Halsey House is an acceptable candidate for relocation since it retains structural integrity, relocation of the

existing building to an alternative location would encounter transportation route constraints and would result in the loss of integrity of setting and association, as explained above.⁷⁶

Since Preservation Alternative 1 does not propose demolition of the Halsey House, construction workers and residents would not be potentially exposed to ACMs or LBPs, and mitigation measures MM HAZ-1.1 through MM HAZ-1.3 would not be needed.

Preservation Alternative 1 would require structural upgrades for conformance with current CBC standards, including ADA accessibility, fire access, and protection of the structure against liquefaction. The City would coordinate with the Fire District to ensure the alternative implements adequate fire access and design standards (e.g., sprinklers). Preservation Alternative 1 would comply with the recommendations identified in the site-specific Geotechnical Investigation.

Relationship to Project Objectives

Preservation Alternative 1 would meet some, but not all, of the project objectives. Assuming the Halsey House is relocated in a manner that eliminates the safety hazards associated with the structure's current condition through implementation of required structural upgrades, this alternative would meet the objective of protecting the health, safety, and welfare of the surrounding community by eliminating safety hazards associated with the Halsey House building, which is currently vacant and in a state of disrepair. Additionally, relocating the Halsey House would meet the objective of maintaining and improving public open space at the project site through restoration of landscaped areas and enhanced open space accessibility and visibility. However, this alternative would not adhere to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings because the relocation would affect the historic integrity of the structure. This alternative would also require continued financing to maintain the Halsey House after relocation; thus, this alternative would not reduce or eliminate maintenance costs.

Conclusion

Relocation of the Halsey House would preserve the building instead of demolishing it, which would result in lesser impacts than the proposed project. However, the historic impact would not be reduced to a less than significant level because relocation of the Halsey House would result in a loss of integrity and association. Additionally, relocation of the Halsey House would be infeasible to implement without resulting in undesirable impacts to the Preserve.

8.2.2.3 *Preservation Alternative 2 – Full Rehabilitation of Historic Resource*

Under Preservation Alternative 2, the historic resource would be retained on-site and fully rehabilitated. There would be no demolition of the Halsey House.

⁷⁶ Page & Turnbull. *Halsey House Relocation Feasibility Study*. July 15, 2024. Page 17.

Comparison of Environmental Impacts

Preservation Alternative 2 would avoid the project's significant and unavoidable impacts because a historic resource would not be demolished. The full rehabilitation of the Halsey House would have similar air quality fugitive dust impacts if heavy-duty construction equipment or trucks, which can kick up dust while traveling on exposed pervious surfaces, are required. Implementation of Standard Conditions of Approval to reduce generation of fugitive dust would be required of this alternative.

Rehabilitation of the Halsey House would require exterior and interior work over an approximately 12-month construction period. Exterior work would include grading, provision of new walkways and pathways for accessibility around the building perimeter and to Shoup Park, rehabilitation of the courtyard, repair of the concrete terrace, roof upgrades, wood repairs, rehabilitation of windows, and rehabilitation of doors. Interior work would include carpet removal, new flooring, ceiling and wall repair, replacement or modification of door thresholds, installation of handrails, and replacement of kitchen cabinets and appliances. This alternative would also include structural improvements and building system upgrades for energy efficiency and lighting. For these reasons, this alternative would result in similar impacts to the Townsend's big-eared bats roosting in the structure as the proposed project. Additionally, exterior work involved with this alternative would include removal of vegetation, which could impact woodrat nests. Mitigation measures MM BIO-1.1 through MM BIO-1.3 and MM BIO-2.1 identified for the proposed project would still need to be implemented to reduce these impacts to a less than significant level.

Preservation Alternative 2 would require structural upgrades for conformance with current State Historic Building Code (SHBC) standards, including ADA accessibility and usability (such as ramps, doorway widening, etc.), fire access, seismic upgrades, and protection of the structure against liquefaction. The City would coordinate with the Fire District to ensure the alternative implements adequate fire access and design standards (e.g., sprinklers). Preservation Alternative 2 would comply with the recommendations identified in the site-specific Geotechnical Investigation. All necessary improvements would need to be completed in compliance with the Secretary of Interior's Standards for Rehabilitation as they pertain to adaptive reuse, which emphasize minimal change to the defining characteristics of the building and its site and environment. Modifications to the building that would be necessary to meet the SHBC would be dependent on the future adaptive reuse of the building.

Additionally, since the site is currently mapped within a regulatory floodway and floodplain, rehabilitation may be required to comply with the Secretary of Interior's Guidelines on Flood Adaptation for Rehabilitating Historic Buildings, which includes measures such as elevating the building on a new foundation, as long as those measures would not risk damaging the historic integrity of the structure. However, the Guidelines call for a site-specific assessment of flood risks before determining which measures may be required. As described in Section 4.10.2.1, LIDAR and GPS data indicates the site may not be located in a floodway or floodplain. If a site-specific assessment of flood risks completed as part of the rehabilitation effort determines that the structure is not at risk from potential flooding, no floodproofing measures would be required.

Relationship to Project Objectives

Preservation Alternative 2 would meet the project's objective of complying with the Secretary of the Interior's Standards since all physical improvements would be required to adhere to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. As a result, this alternative would not affect the historic integrity of the structure. Full rehabilitation of the Halsey House would also meet the project's objective of protecting the health, safety, and welfare of the surrounding community by eliminating safety hazards since the building would be restored and safety hazards would be removed. However, this alternative would not meet the project's objective of reducing or eliminating the cost to rehabilitate the existing structure to a usable condition. This alternative would meet the objective of reducing or eliminating ongoing maintenance costs associated with an unused public facility only if an adaptive reuse of the rehabilitated structure could be identified and if the City would have sufficient funds to maintain and operate the structure in perpetuity. There is not, however, an existing reuse plan for the structure. As such, even with rehabilitation, the City may still have ongoing maintenance costs associated with an unused public facility.

Conclusion

Preservation Alternative 2 would avoid the project's significant and unavoidable impact but would not avoid the project's mitigated impacts. The project would meet the health, safety, and welfare objective, adherence to the Secretary of Interior's Standards objective, as well as the objective related to ongoing maintenance of an unused public facility, but would not meet the objectives related to maintaining and improving public open space at the project site or reducing/eliminating the costs related to rehabilitation.

8.2.2.4 *Preservation Alternative 3 – Partial Rehabilitation/Partial Demolition*

Preservation Alternative 3 would consist of the demolition of the east and west wings of the structure and rehabilitation of the Entry, Main Room, Ohlone Room, and Ohlone Kitchen, along with a new building addition to house restrooms and an interior ramp. Building uses may include classes, meetings, or special events.

Comparison of Environmental Impacts

As described in the Historic Resource Evaluation prepared for the project, the Halsey House retains integrity for design, materials, and workmanship as many of the character-defining features of the residence are still evident. Halsey House is a modest example of a 1920s Spanish Colonial Revival style residence that retains a high degree of original materials including its stucco cladding, clay tile roof, multi-lite windows and doors, and metal (e.g., hardware and portions of lighting) fixtures. The presence of these features is consistent throughout the residence and demonstrates the 1920s workmanship. Additionally, the landscaping surrounding the Halsey House still consists of the

mature trees and fruit trees that were planted by Emma Wright Halsey and Mori during her period of residence.⁷⁷

Preservation Alternative 3 would demolish both wings of the Halsey House, which would leave less than half of the original structure intact. This level of demolition would remove many of the character-defining features of the building, significantly affecting the historic integrity of the structure and resulting in a significant unavoidable impact under CEQA. Additionally, this alternative would not avoid demolition-related impacts since some demolition would still occur, and additional construction-related impacts would be created as part of the rehabilitation activities. The mitigation measures and Standard Conditions of Approval identified for the proposed project would still need to be implemented to reduce these impacts to a less than significant level.

Preservation Alternative 3 would require structural upgrades for conformance with current CBC standards, including ADA accessibility, fire access, and protection of the structure against liquefaction. The City would coordinate with the Fire District to ensure the alternative implements adequate fire access and design standards (e.g., sprinklers). Preservation Alternative 3 would comply with the recommendations identified in the site-specific Geotechnical Investigation. Similar to Preservation Alternative 2, all necessary improvements would need to be completed in compliance with the SHBC and the Secretary of Interior's Standards for Rehabilitation as they pertain to adaptive reuse, which emphasize minimal change to the defining characteristics of the building and its site and environment.

Additionally, as described in Preservation Alternative 2, since the site is currently mapped within a regulatory floodway and floodplain, rehabilitation may be required to comply with the Secretary of Interior's Guidelines on Flood Adaptation for Rehabilitating Historic Buildings. As described in Section 4.10.2.1, however, LIDAR and GPS data indicates the site may not be located in a floodway or floodplain. If a site-specific assessment of flood risks completed as part of the rehabilitation effort determines that the structure is not at risk from potential flooding, no floodproofing measures would be needed.

Relationship to Project Objectives

Preservation Alternative 3 would meet the project's objective of protecting the health, safety, and welfare of the surrounding community by eliminating safety hazards since the building would be rehabilitated and safety hazards would be removed. However, this alternative would not adhere to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings because demolition of both wings would affect the historic integrity of the structure, nor would it meet the objective of reducing or eliminating the cost to rehabilitate the existing structure to a usable condition. This alternative would meet the objective of reducing or eliminating ongoing maintenance costs associated with an unused public facility only if an adaptive reuse plan of the rehabilitated structure could be identified and if the City would have sufficient funds to maintain and operate the structure in perpetuity. There is not, however, an existing reuse plan for the

⁷⁷ Page & Turnbull. *Halsey House Historic Resource Evaluation*. July 2021. Pages 44 through 47.

structure. As such, even with rehabilitation, the City may still have ongoing maintenance costs associated with an unused public facility.

Conclusion

Preservation Alternative 3 would not avoid the project's significant and unavoidable impact since it includes partial demolition that would alter the historic integrity of the Halsey House. This alternative would meet the health, safety, and welfare objective, as well as the objective related to ongoing maintenance of an unused public facility, but would not meet the objectives related to adherence to the Secretary of the Interior's Standards, reducing/eliminating rehabilitation costs, or maintaining and improving public open space at the project site.

8.2.2.5 *Preservation Alternative 4 – Mothballing*

Mothballing controls the long-term deterioration of a building while it is unoccupied. This process also stabilizes the building and protects the structure from fire, vandalism, and sudden loss. An effort to achieve a successful mothballing requires securing the structure from unwanted entry and providing adequate ventilation. The City currently has the Halsey House boarded up, and a locked fence surrounds the residence to secure the project site and prevent intruders.

Under this alternative, additional actions would be taken to start repairing and/or replacing damaged interior and exteriors surfaces to prevent further deterioration. Areas that have holes or are susceptible to water damage would be covered or filled to prevent water or pest intrusion without damaging the original materials. All debris, including furniture, equipment, appliances, broken glass, would be removed. Window and door openings would be replaced if broken. Any surfaces with signs of vandalism or paint failure would be repainted. The Halsey House would be thoroughly cleaned to remove debris on the floor (including birds, animals or insects, droppings and carcasses from the structure interiors) and to remove any water damaged carpet as moist carpets can promote mold and mildew growth. Additionally, any historic resource elements (such as stucco cladding, clay tile roof, multi-lite windows and doors, and metal features) that are removed would require documentation, cataloging, and storing for safekeeping. All loose architectural or design elements in the Halsey House would be secured in place or cataloged and removed for storage.⁷⁸

Mothballing typically protects historic buildings for a period of up to 10 years and requires continued monitoring and maintenance during that time.⁷⁹

Comparison of Environmental Impacts

Preservation Alternative 4 would avoid the project's significant and unavoidable impacts because it would not substantially change existing conditions or demolish the Halsey House. The mothballing alternative would keep the Halsey House in the same location and repair any damage to the

⁷⁸ Architectural Resources Group. *Halsey House Pricing and Feasibility Study*. July 2021. Page 11.

⁷⁹ United States Department of the Interior, National Park Service. "Preservation Brief 31: Mothballing Historic Building." Accessed December 19, 2025. <https://www.nps.gov/orgs/1739/preservation-briefs.htm>.

structure, protecting the building from further significant deterioration for a period of up to 10 years. Any repairing or replacing activity would likely require hand tools, not heavy-duty construction equipment powered by diesel engines. In addition, the mothballing alternative would not have construction phases, such as demolition, site preparation, or grading, where soil is disturbed resulting in fugitive dust emissions. Therefore, this alternative would avoid the need for Standard Conditions of Approval to reduce fugitive dust emissions. Additionally, the mothballing alternative would likely not impact woodrats and would not require implementation of MM BIO-1.1 through MM BIO-1.3. However, the mothballing alternative would include eviction of the Townsend's big-eared bats roosting inside the building. Therefore, Preservation Alternative 4 would require implementation of MM BIO-2.1.

Relationship to Project Objectives

Preservation Alternative 4 would temporarily comply with the health, safety, and welfare objective as certain components of the Halsey House would be repaired and safety hazards would be removed. However, compliance with this objective would only last for the duration of the mothballing is active, monitored, and maintained. As discussed above, mothballing is typically effective for a period of up to 10 years, after which hazards may return due to continued deterioration. It should be noted that the Halsey House is currently in a state of disrepair, and substantial deterioration has already occurred. Given the current condition of the structure, it is unclear if a mothballing effort would be effective for 10 years. Even if it is assumed the mothballing could be completed in accordance with the Secretary of the Interior's Standards for Mothballing Historic Buildings⁸⁰, this alternative would not meet the objective of complying with all relevant Secretary of Interior's Standards because it would not permanently prevent the further deterioration of the structure to the point where it will ultimately lose its historic integrity, and there is currently no approved plan in place to rehabilitate the structure in accordance with the Secretary of Interior's Standards after the mothballing effort. This alternative would require continued financing to maintain the Halsey House in a less deteriorated condition since mothballing requires ongoing monitoring and maintenance activities; therefore, this alternative would not reduce or eliminate maintenance costs. If mothballing were to occur, the Halsey House would have to be rehabilitated in the future and an adaptive reuse identified or the City would need to again consider demolition of the building. In the short term, this alternative would meet the objective related to reducing costs associated with rehabilitation. In the long term, however, rehabilitation would be required if the intent is to avoid demolition of the structure, since mothballing is only a temporary solution. For a discussion of the implications of rehabilitation, please refer to Preservation Alternative 2 and Preservation Alternative 3.

Conclusion

Preservation Alternative 4 would temporarily avoid the project's significant and unavoidable historic resource impact since it would not alter the historic integrity of the Halsey House or demolish the residence. Instead, mothballing would stabilize and protect the residence from further

⁸⁰ Ibid.

significant damage for a period of up to 10 years. However, at the end of the effective mothballing period, the structure would need to either be rehabilitated or demolished. The mothballing alternative would meet the health, safety, and welfare objective in the short term, but would not meet this objective once the effective mothballing period has expired. It is unclear if this alternative would meet the Secretary of the Interior's Standards objective since it would ultimately require rehabilitation or demolition after the effective mothballing period, and there is no approved plan in place for rehabilitation of the structure in accordance with the Secretary of Interior's Standards and adaptive reuse of the building.

8.2.3 Environmentally Superior Alternative

The CEQA Guidelines state that an EIR shall identify an environmentally superior alternative. If the environmentally superior alternative is the "No Project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (Section 15126.6(e)(2)). Based on the above discussion, the environmentally superior alternative is the No Project Alternative. The No Project Alternative would retain the site in its current condition with the historic building. Retaining the status quo on the site would avoid all construction and operational impacts associated with the project, including the significant and unavoidable loss of the historic resource, and construction-related air quality and biological resources impacts. Therefore, the No Project Alternative is the environmentally superior alternative; however, it would not achieve the project's objectives.

CEQA Guidelines Section 15126.6 (e)(2) states that "if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Beyond the No Project Alternative, the Preservation Alternative 4 – Mothballing would be the environmentally superior alternatives.

Preservation Alternative 4 – Mothballing would avoid the significant unavoidable impact to historic resources. There would also be no construction phases that would result in soil disturbance, grading, or material hauling, and areas of the structure that have deteriorated would be repaired with hand tools, not heavy-duty construction equipment. As a result, air quality impacts related to fugitive dust and biological sources impacts related to woodrats would be avoided, eliminating the need for construction-related Standard Conditions of Approval and MM BIO-1.1 through MM BIO-1.3. However, the Townsend's big-eared bats would be evicted as a result of mothballing, and the project would need to implement MM BIO-2.1 to reduce impacts to the bats. This alternative, however, would not meet any of the project objectives.

Table 8.2-1 below summarizes the difference in impacts from alternatives to the proposed project.

Table 8.2-1: Comparison of Impacts from Alternatives to the Proposed Project

Impacts	Proposed Project	No Project	Relocation of Historic Resource	Full Rehabilitation of Historic Resource	Partial Rehabilitation/ Partial Demolition	Moth-balling
Impact BIO-1: Disturbance of the existing woodrat nests on-site could result in the destruction of nests and injury or mortality of individual woodrats.	LTS/M	NI	LTS/M	LTS/M	LTS/M	NI
Impact BIO-2: Demolition of the structure on-site would disturb Townsend's big-eared bats roosting within the structure.	LTS/M	NI	LTS/M	LTS/M	LTS/M	LTS/M
Impact CUL-1: Implementation of the proposed project would result in the demolition of the Halsey House, which is a historic resource.	SU	NI	SU	LTS	SU	LTS
Impact HAZ-1: Demolition of the existing building could expose construction workers or residents in the vicinity of the project site to harmful levels of ACMs or LBPs.	LTS/M	NI	NI	LTS/M	LTS/M	LTS/M
Meets Project's Objectives?						
Objective 1	Yes	No	Yes	Yes	Yes	No
Objective 2	Yes	No	Yes	No	No	No
Objective 3	Yes	No	No	Yes	Yes	No
Objective 4	Yes	No	No	No	No	No
Objective 5	Yes	No	No	Yes	No	No
Notes: LTS/M = less than significant impact with mitigation incorporated; LTS = less than significant impact; NI = no impact						
Bold text indicates being environmentally superior to the proposed project.						

Section 9.0 References

The analysis in this EIR 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:

Architectural Resources Group. *Halsey House Pricing and Feasibility Study*. July 2021.

Association of Bay Area Governments and Metropolitan Transportation Commission. Plan Bay Area 2050. October 21, 2021.

Bay Area Air Quality Management District. "Air Quality Standards and Attainment Status." Last Updated December 15, 2025. Accessed December 19, 2025. <https://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status>.

---. *Final 2017 Clean Air Plan*. April 19, 2017. Page 12.

---. "Permitted Stationary Sources Screening Report." Accessed December 19, 2025. Available at <https://baaqmd.maps.arcgis.com/apps/webappviewer/index.html?id=845658c19eae4594b9f4b805fb9d89a3>.

Boccaleoni, Anthony. Environmental Manager, Republic Services, Inc. Personal Communication. May 12, 2023.

California Air Resources Board. *2022 Scoping Plan for Achieving Carbon Neutrality*. December 2022.

---. "Advanced Clean Cars II." Accessed February 27, 2025. <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/advanced-clean-cars-ii>.

---. "Overview: Diesel Exhaust and Health." Accessed December 19, 2025. <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>.

California Building Standards Commission. "California Building Standards Code." Accessed December 19, 2025. <https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo>.

California Department of Conservation. "California Important Farmland Finder." Accessed December 19, 2025. <https://maps.conservation.ca.gov/DLRP/CIFF/>.

---. "Earthquake Zones of Required Investigation." Accessed December 19, 2025. <https://maps.conservation.ca.gov/cgs/EQZApp/>.

---. "Farmland Mapping and Monitoring Program." Accessed December 19, 2025. <http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx>.

---. "Williamson Act." Accessed December 19, 2025. <http://www.conservation.ca.gov/dlrp/lca>.

California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed December 19, 2025. <http://frap.fire.ca.gov/>.

---. "Fire Hazard Severity Zones." Accessed December 19, 2025. <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>.

California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed December 19, 2025. <https://www.hcd.ca.gov/planning-and-community-development/housing-elements>

California Department of Resources Recycling and Recovery. "Five-Year Countywide or Regional Agency Integrated Waste Management Plan Review Report Guidelines." Accessed December 19, 2025. <https://calrecycle.ca.gov/lgcentral/library/policy/5yrreview/>.

California Department of Transportation. "Scenic Highways." Accessed December 19, 2025. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.

California Environmental Protection Agency. "Cortese List Data Resources." Accessed December 19, 2025. <https://calepa.ca.gov/sitecleanup/corteselist/>.

California Office of Historic Preservation. "California Office of Historic Preservation Technical Assistance Series #6." Accessed August December 19, 2025. <https://ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf>.

California State Water Resources Control Board. "2020-2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report)." May 11, 2022. Accessed December 19, 2025. https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html.

California Water Service. *2020 Urban Water Management Plan, Los Altos Suburban District*. June 2021. https://www.calwater.com/docs/uwmp2020/LAS_2020_UWMP_FINAL.pdf

CalRecycle. Analysis of the Progress Toward the SB 1383 Organic Waste Reduction Goals. August 18, 2020. [https://www2.calrecycle.ca.gov/Publications/Details/1693#:~:text=Analysis%20of%20the%20Progress%20Toward,\(DRRR%2D2020%2D1693\)&text=SB%201383%20establishes%20targets%20to,75%20percent%20reduction%20by%202025](https://www2.calrecycle.ca.gov/Publications/Details/1693#:~:text=Analysis%20of%20the%20Progress%20Toward,(DRRR%2D2020%2D1693)&text=SB%201383%20establishes%20targets%20to,75%20percent%20reduction%20by%202025).

City of Los Altos. 6th Cycle Housing Element 2023-2031. Adopted January 2023, revised August 2023. <https://www.losaltosca.gov/DocumentCenter/View/286/6th-Cycle-Los-Altos-Housing-Element-2023-to-2031-PDF>.

---. "About Us." Accessed December 19, 2025 <https://www.losaltosca.gov/262/About-Us>.

---. *City of Los Altos Bicycle Transportation Plan*. April 10, 2012.

---. *City of Los Altos Pedestrian Master Plan*. August 2015.

---. "Fire." Accessed December 19, 2025. <https://www.losaltosca.gov/358/Fire>.

---. "Historic Resources Inventory." Accessed December 19, 2025. <https://www.losaltosca.gov/535/Historic-Inventory>.

---. *Initial Study/Mitigated Negative Declaration for the Los Altos General Plan Update*. November 2002.

---. "Local Creeks." Accessed December 19, 2025. <https://www.losaltosca.gov/461/Local-Creeks>.

---. *Los Altos General Plan Initial Study/Mitigated Negative Declaration*. November 2002.

---. "Map of Parks." Accessed December 19, 2025. <https://www.losaltosca.gov/documentcenter/view/1950>.

---. "School Districts." Accessed December 19, 2025. <https://www.losaltosca.gov/462/School-Districts>.

---. "Stormwater Master Plan – Appendix A: Drainage Basins." Accessed December 19, 2025. <https://www.losaltosca.gov/441/Stormwater-Master-Plan>.

---. "Public Works – Sanitary Sewer." Accessed December 19, 2025. <https://www.losaltosca.gov/432/Sanitary-Sewer>.

Cornerstone Earth Group. *Geotechnical Investigation Halsey House*. February 2024.

County of Santa Clara. "Soils of Santa Clara County," Accessed December 19, 2025. <https://hub.arcgis.com/datasets/sccplanning::soils-of-santa-clara-county/explore>.

---. "Williamson Act Properties Map," Accessed December 19, 2025. <https://experience.arcgis.com/experience/034e46f2f4bc44d1ada505dd92940ff7>.

CSG Consultants, Inc. *Halsey House Bridge Crossing Structural Assessment Memorandum*. December 2025.

Department of Toxic Substances Control. "EnviroStor database." Accessed December 19, 2025. <https://www.envirostor.dtsc.ca.gov/public>.

Page & Turnbull. *Halsey House Historic Resource Evaluation*. July 2021.

---. *Halsey House Relocation Feasibility Study*. July 2024.

Schaaf & Wheeler. *Halsey House CEQA Hydrology Memorandum*. March 2024. Page 3.

Silicon Valley Clean Energy. "Frequently Asked Questions." Accessed December 19, 2025. <https://www.svcleanenergy.org/faqs>.

State of California Department of Finance. “E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2021-2025.” May 2025. Accessed December 19, 2025. <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/>

State Water Resources Control Board. “GeoTracker.” Accessed December 19, 2025. <https://geotracker.waterboards.ca.gov>.

United States Department of Energy. “Energy Independence & Security Act of 2007.” Accessed December 19, 2025. <http://www.afdc.energy.gov/laws/eisa>.

United States Energy Information Administration. “California State Energy Profile.” Accessed December 19, 2025. <https://www.eia.gov/state/print.php?sid=CA>.

---. Energy Information Administration. “Petroleum & Other Liquids, California Field Production of Crude Oil.” September 27, 2023. Accessed December 19, 2025. <https://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=pet&s=mcrfpca1&f=a>

United States Environmental Protection Agency. “The 2022 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975.” December 2022. Accessed December 19, 2025. <https://www.epa.gov/system/files/documents/2022-12/420r22029.pdf>.

United States Department of Transportation. “USDOT Announces New Vehicle Fuel Economy Standards for Model Year 2024-2026.” April 1, 2022. Accessed December 19, 2025. <https://www.nhtsa.gov/press-releases/usdot-announces-new-vehicle-fuel-economy-standards-model-year-2024-2026>.

United States Environmental Protection Agency. “EPA Actions to Protect the Public from Exposure to Asbestos.” Accessed December 19, 2025. <https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos>

---. “Superfund: CERCLA Overview.” Accessed December 19, 2025. <https://www.epa.gov/superfund/superfund-cercla-overview>.

---. “Summary of the Resource Conservation and Recovery Act.” Accessed December 19, 2025. <https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act>.

Valley Transportation Authority. “40 Local Schematic Map.” Effective August 14, 2023. Accessed December 19, 2025. <https://www.vta.org/go/routes/40>.

---. “52 Local Schematic Map.” Effective August 14, 2023. Accessed December 19, 2025. <https://www.vta.org/go/routes/52>.

---. “System Map.” October 30, 2023. Accessed December 19, 2025. <https://www.vta.org/sites/default/files/2023-10/System-Map-103023.pdf>.

Valley Water. *2021 Groundwater Management Plan, Santa Clara and Llagas Subbasins*. November 2021.

---. "Map of District Creeks." Accessed December 19, 2025.

<https://valleywater.maps.arcgis.com/apps/instant/nearby/index.html?appid=3f6d541471544eea8bf27a3259ec0384&sliderDistance=1>.

Section 10.0 Lead Agency and Consultants

10.1 Lead Agency

City of Los Altos

Stephanie Williams, Development Services Director
Harun Musaefendic, Associate Civil Engineer

10.2 Consultants

David J. Powers & Associates, Inc.

Environmental Consultants and Planners

Shannon George, Principal and Vice President
Michael Lisenbee, Senior Project Manager
Mimi McNamara, Project Manager
Maria Kisyova, Project Manager
Nick Towstopiat, Project Manager
Ryan Osako, Graphic Artist

Cornerstone Earth Group, Inc.

Geotechnical Engineers

Stephen Ohlsen, Senior Project Engineer
Jesse Serpa, Senior Staff Engineer

Page & Turnbull

Historic Resource Consultants

Ruth Todd, Principal
Sarah Brummett, Senior Associate, Director of the Preservation Technology Studio,
Designer/Senior Preservation Specialist

Schaaf & Wheeler

Hydrology Civil Engineers

Robin Lee, Senior Project Manager
Sarah Weinberg, Assistant Civil Engineer

Section 11.0 Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	Asbestos-Containing Material
Air District	Bay Area Air District
ALUC	Airport Land Use Commission
APN	Assessor's Parcel Number
asml	above mean sea level
ATCM	Asbestos Airborne Toxic Control Measure
Bay Area	San Francisco Bay Area
bgs	below ground surface
BTP	Bicycle Transportation Plan
BMP	best management practice
Btu	British thermal unit
CAAQS	California Ambient Air Quality Standard
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Department of Industrial Relations, Division of Occupational Safety and Health
CalARP	California Accidental Release Prevention
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Standards Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH ₄	methane
CIWMP	County Integrated Waste Management Plan

CLUP	Comprehensive Land Use Plan
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalents
CRHR	California Register of Historical Resources
CSMP	Complete Streets Master Plan
CUPA	Certified Unified Program Agency
dBA	A-weighted decibel
DNL	Day/Night Average Sound Level
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EO	Executive Order
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
EV	electric vehicle
FAA	Federal Aviation Administration
FAR	floor area ratio
FHSZ	Fire Hazard Severity Zone
FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gases
GHGRS	Greenhouse Gas Reduction Strategy
GWh	gigawatt hour
GWP	Global Warming Potential
HABS	Historic American Building Survey
HRI	Historic Resources Inventory
HSWA	Hazardous and Solid Waste Amendments
L _{eq}	Energy-Equivalent Sound/Noise Descriptor
L _{max}	Maximum A-weighted noise level during a measurement period
LAMC	Los Altos Municipal Code
LAS District	Los Altos Suburban District

LOS	Level of Service
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
MMTCO ₂ e	Million Metric Tons of Carbon Dioxide Equivalent
MND	Mitigated Negative Declaration
mpg	miles per gallon
MSL	mean sea level
MTC	Metropolitan Transportation Commission
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standard
NAHC	Native American Heritage Commission
NCP	National Contingency Plan
NESHAP	National Emission Standards for Hazardous Air Pollutants
NISL	Newby Island Sanitary Landfill
NO ₂	nitrogen dioxide
NOA	Naturally Occurring Asbestos
NOD	Notice of Determination
NO _x	Nitrogen Oxides
NRHP	National Register of Historic Places
NTMP	neighborhood traffic management program
O ₃	ozone
OITC	Outdoor-Indoor Transmission Class
PARWQCP	Palo Alto Regional Water Pollution Control Plant
PCB	polychlorinated biphenyls
PCF	perfluorocarbon
PDA	Priority Development Area
PG&E	Pacific Gas and Electric Company
PM	particulate matter
PM ₁₀	Particulate matter with a diameter of 10 microns or less
PM _{2.5}	Particulate matter with a diameter of 2.5 microns or less
PMP	Pedestrian Master Plan
PPV	Peak Particle Velocity

RAP	Removal Action Plan
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Needs Allocation
ROG	Reactive Organic Gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	State Bill
SCS	Sustainable Communities Strategy
SF ₆	Sulfur Hexafluoride
SHMA	Seismic Hazards Mapping Act
SMARA	Surface Mining and Reclamation Act
SMP	Site Management Plan
SO _x	Sulfur Oxides
SR	State Route
SRA	State Responsibility Area
STC	Sound Transmission Class
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
Title 24	Title 24, Part 6 of the California Code of Regulations
TSCA	Toxic Substances Control Act
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled
VTA	Santa Clara Valley Transportation Authority
Williamson Act	California Land Conservation Act
WSA	Water Supply Assessment
ZNE	Zero Net Carbon Emission

**NOTICE OF PREPARATION OF
A DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE HALSEY HOUSE PROJECT**

Los Altos, California
February 2025

PROJECT APPLICANT: City of Los Altos

APN: 175-30-021

As the Lead Agency, the City of Los Altos will prepare an Environmental Impact Report for the above-referenced project and would like your views regarding the scope and content of the environmental information to be addressed in the EIR.

The project description, location, and a brief summary of the environmental effects that could result from the proposed project are attached.

According to State law, the deadline for your response is 30 days after receipt of this notice; however, we would appreciate an earlier response, if possible. Please identify a contact person, and send your response to:

City of Los Altos
Public Works Department
Attention: Harun Musaefendic
One North San Antonio Road
Los Altos, CA 94022
HMusaefendic@losaltosca.gov



Aida Fairman, Public Works Director

2/6/2025

Date

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE HALSEY HOUSE PROJECT

February 2025

A. INTRODUCTION

The purpose of an Environmental Impact Report (EIR) is to inform decision-makers and the general public of the environmental effects of a proposed project that an agency may implement or approve. The EIR process is intended to provide information sufficient to evaluate a project and its potential for significant impacts on the environment, to examine methods of reducing adverse impacts, and to consider alternatives to the project.

An EIR is prepared when it is determined by the discretionary authority that changes proposed in an approved project will require revisions to the previous EIR because of possible new impacts or an increase in severity of previously identified impacts. As the Lead Agency, the City of Los Altos will prepare an EIR to address the environmental effects of the Halsey House Project.

The EIR will be prepared and processed in accordance with the California Environmental Quality Act (CEQA) of 1970, as amended, and the requirements of the City of Los Altos. In accordance with the requirements of CEQA, the EIR will include the following:

- A summary of the project;
- A project description, including project objectives;
- A description of the existing environmental setting, probable environmental impacts, and mitigation measures; and
- Environmental consequences, including (a) any significant environmental effects which cannot be avoided if the project is implemented; (b) any significant irreversible and irretrievable commitments of resources; (c) the growth inducing impacts of the proposed project; and (d) cumulative impacts.

The EIR also will discuss a reasonable range of alternatives to the project that could reasonably attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant environmental effects of the project (CEQA Guidelines Section 15126.6[a]).

Project Location

The project site is located at 482 University Avenue in Los Altos (Assessor Parcel Number [APN] 175-30-021). The site is situated within the six-acre Redwood Grove Nature Preserve, which is surrounded by single-family residences.

Refer to Figures 1 and Figure 2 for regional and vicinity maps of the project site. An aerial photograph with surrounding land uses is shown on Figure 3. The project disturbance area is shown in Figure 4.

Project Description

The Halsey House was built in 1923 and used as a private residence until the property was purchased by the City of Los Altos in 1974 to serve as a park. The building was then converted to a nature center for educational and recreational programming. In 2008, the building was closed to the public. Since 2008, the Halsey House has remained vacant and unused. The Halsey House is a local Historic Landmark and is eligible for the California Register of Historic Resources (CRHR). As a result, it is considered a historic resource under CEQA.

The project proposes to demolish the Halsey House building. Demolition activities would occur within an approximately 15,000 square foot (or 0.3 acre) area of disturbance surrounding the building and would last roughly three months. Demolition equipment, such as an excavator, a bulldozer, and a track loader, would be utilized throughout the demolition period. Equipment and workers would access the site via the Redwood Grove Nature Preserve entrance on University Avenue. Equipment staging would occur within the proposed area of disturbance. After demolition of the building, the site would be cleared and replanted with native plant landscaping that matches the existing vegetation. All building materials would be hauled to an appropriate off-site disposal location.

Required Project Approvals

- Historical Alteration Permit

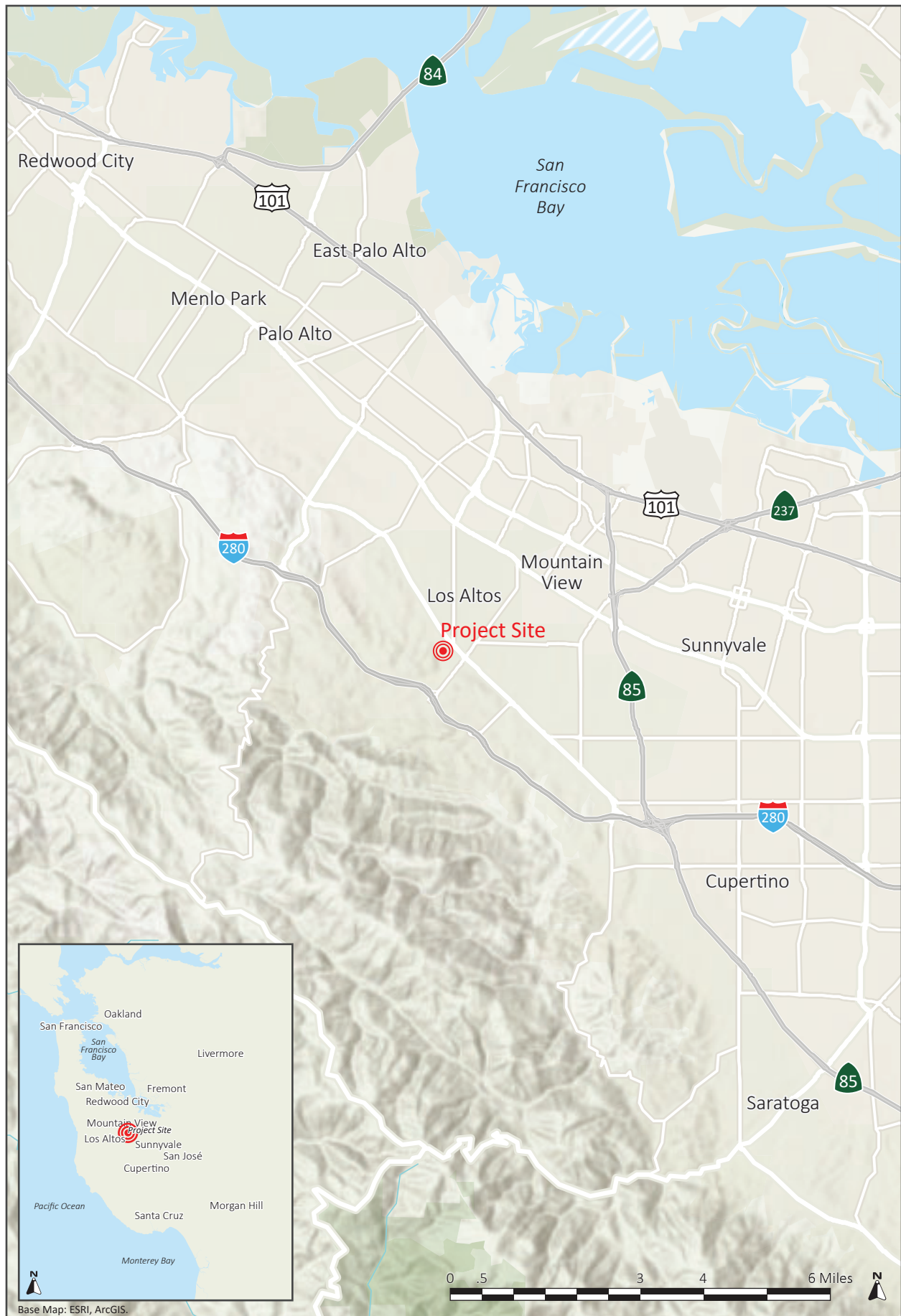
Potential Significant Environmental Impacts of the Project

The EIR will identify the significant environmental effects anticipated to result from development of the project as proposed. Mitigation measures will be identified for significant impacts, as warranted. The EIR will include a discussion of all impact areas required by the CEQA Guidelines, with a particular focus on the following specific environmental categories most relevant to the proposed project:

- **Biological Resources** – The project site is located in the Redwood Grove Nature Preserve, which includes mature redwoods and Adobe Creek. The area has the potential to support special-status species (bats and the great blue heron) and sensitive habitats (wetlands). The EIR will identify the existing biological conditions, including special-status species with the potential to occur on the project site and any potentially sensitive/regulated habitats that may be present. In addition, the EIR will identify and discuss the project's biological impacts during demolition.

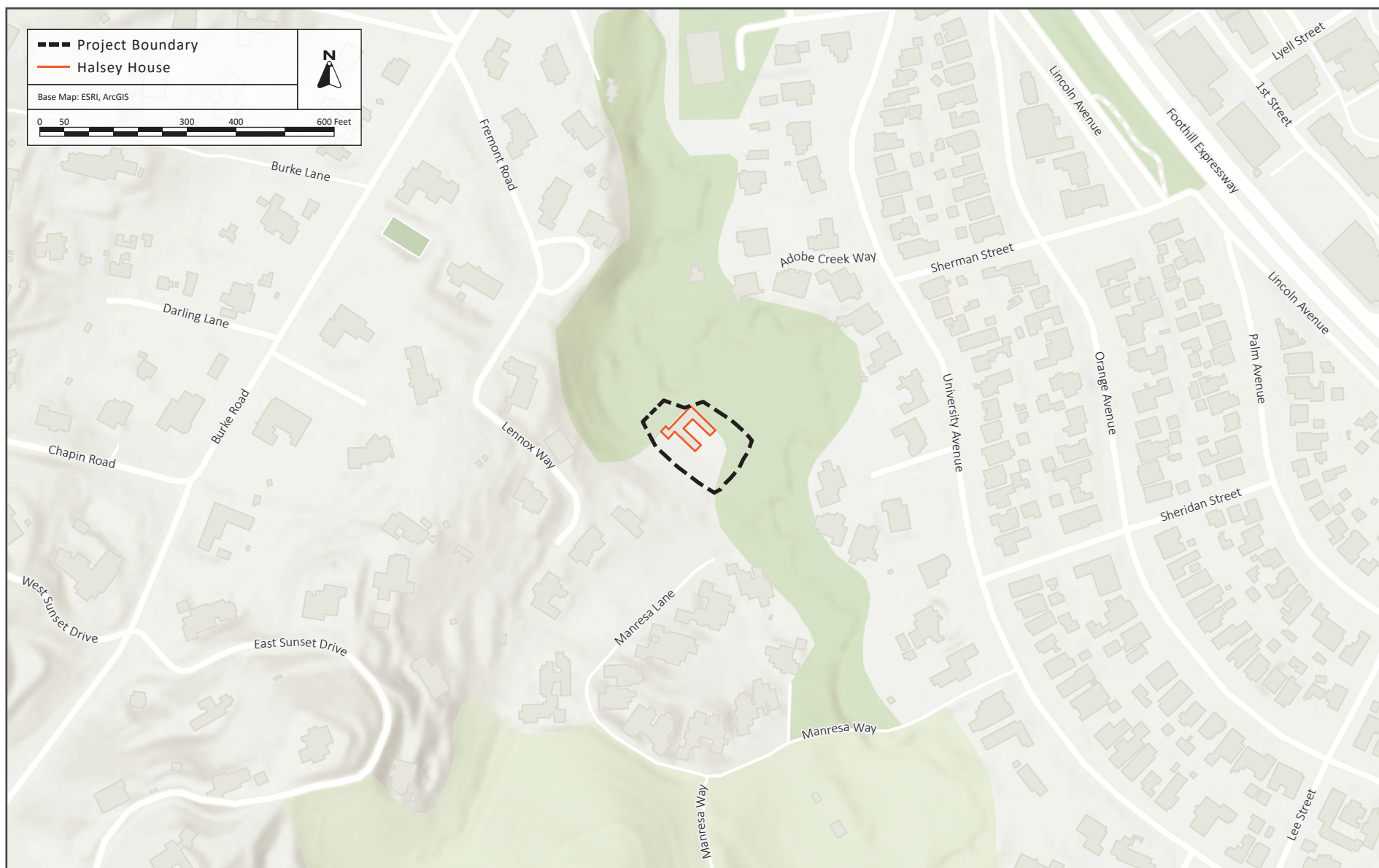
- **Cultural Resources** – The project, as proposed, would demolish the Halsey House, which is a local Historic Landmark and is eligible for the CRHR. This would be a significant impact under CEQA that could not be mitigated to a less than significant level. The EIR will disclose the significant and unavoidable impact, identify all feasible mitigation (such as recordation and salvage), and identify a reasonable range of alternatives to the proposed project.
- **Hydrology and Water Quality** – The project site is currently mapped in an area designated as a Zone AE Special Flood Hazard Area (SFHA) by the Federal Emergency Management Agency (FEMA). Additionally, the Halsey House structure is partially within a mapped floodway associated with Adobe Creek. Floodways are FEMA designated areas where no placement of blockages shall occur unless an analysis is conducted that shows the structures present no impact. The EIR will analyze the surrounding floodplain and determine whether or not the existing structure impedes flood flows. The EIR will also evaluate the impacts of demolishing the structure
- **Cumulative Impacts** – Pursuant to CEQA Guideline Section 15130, the EIR will discuss the cumulative impacts of the project in combination with other past, present or reasonably foreseeable projects.
- **Alternatives to the Project** – Pursuant to CEQA Guidelines Section 15126.6, the EIR will evaluate a reasonable range of alternatives to the project, based on the results of the environmental analysis. A No Project Alternative will be evaluated along with its impacts. The alternatives discussion will focus on those alternatives that could feasibly accomplish most of the basic objectives of the proposed project and could avoid or substantially lessen one or more of the significant environmental effects identified in the EIR (CEQA Guidelines Section 15126.6). The environmentally superior alternative(s) will be identified based on the number and degree of associated environmental impacts.

In addition, the EIR will address the project's impacts on aesthetics, agricultural/forestry resources, air quality, energy, greenhouse gas emissions, hazards and hazardous materials, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation, tribal cultural resources, utilities/service systems, and wildfire. The EIR will also include all other sections required under the CEQA Guidelines including significant and unavoidable impacts, significant irreversible environmental changes, and growth-inducing impacts.



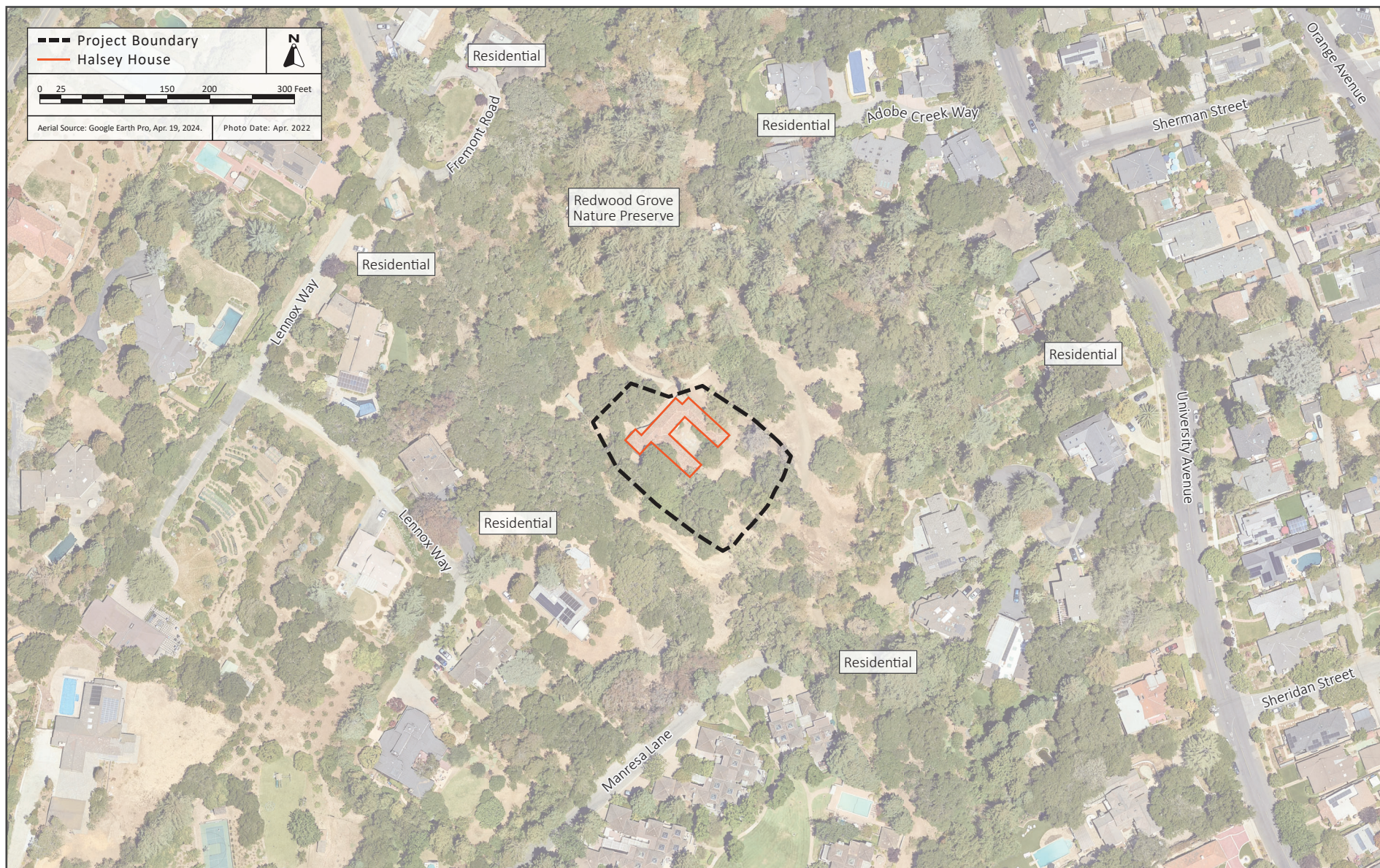
REGIONAL MAP

FIGURE 1



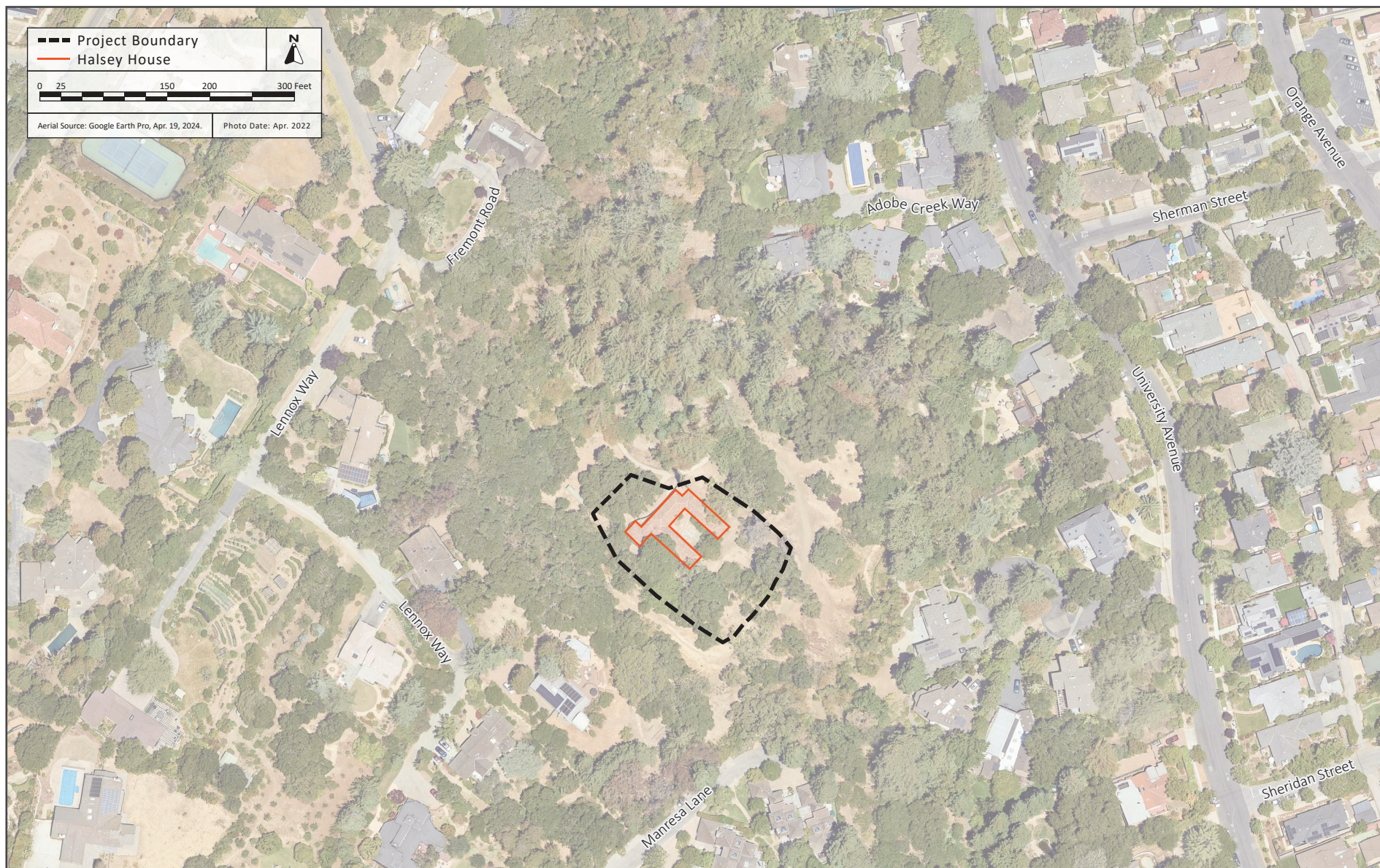
VICINITY MAP

FIGURE 2



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

FIGURE 3



SITE PLAN

FIGURE 4

Mr. Gabriel Engeland
City manager, City of Los Altos
1 North San Antonio Rd.
Los Altos, CA 94022

March 14, 2025

Dear Mr. Engeland:

Friends of Historic Redwood Grove was formed in 2014 by a group of Los Altos residents with the goal of ensuring the preservation of Redwood Grove along with its historic elements. As you may be aware, we were instrumental in funding a Historic Resource Evaluation (HRE) of Halsey House and have continued to advocate for the preservation and restoration of this important City landmark.

It has come to our attention that the City of Los Altos is working to develop an Environmental impact Report at the request of the Los Altos City Council to evaluate a range of alternatives for this building. The EIR File, number EVN25467 was filed with the County of Santa Clara on February 12, 2025. This email is in response to that action.

The City of Los Altos is required to conduct a PUBLIC scoping meeting prior to initiating an EIR if publicly requested or considered of state or regional designation (including historical buildings)

Two draft EIR filings by the City of Los Altos contain statements acknowledging this requirement:

1. CONSISTENT with Section 21083.9 of the CEQA statute, the City will conduct a scoping meeting, solicit input and comments from the general public and public agencies as to the content and scope of the Draft EIR.
2. Section 21083.9 of the California Environmental Quality Act (CEQA) statute mandates that an agency must hold scoping meetings for a proposed project if a written requests made, particularly for projects that may significantly impact highways or other facilities under the Department of Transportation's jurisdiction, or projects considered to be of statewide, regional areawide significance.

Halsey House meets the above criteria and Friends of Historic Redwood Grove is requesting a public scoping meeting in which the content and scope of the Draft EIR will be discussed.

Best Regards,

Marie Backs,
President, Friends of Historic Redwood Grove

From: [Harun Musaefendic](#)
To: [Michael Lisenbee](#)
Cc: [Aida Fairman](#)
Subject: FW: Halsey House Notice of CEQA Prep
Date: Wednesday, March 26, 2025 4:11:47 PM

Hey Michael,

See comments from Jim Wing below, I'm not sure if I have sent them before.

Let me know if you have any questions.

Thank you,

Harun Musaefendic, PE
Associate Civil Engineer

From: Jim Wing <jameswing@msn.com>
Sent: Sunday, March 9, 2025 12:06 PM
To: Harun Musaefendic <HMusaefendic@losaltosca.gov>
Cc: Aida Fairman <AFairman@losaltosca.gov>; Gabriel Engeland <gengeland@losaltosca.gov>
Subject: Halsey House Notice of CEQA Prep

Harun Musaefendic,

Thank you for posting notice of CEQA Preparation on Los Altos Web site! I recommend you reconsider technical feasibility for Project Description – page 2-Equipment Access from Redwood Grove University Entrance that requires crossing “8 Ton Bridge” and equipment access through narrow road space between two major Redwood Trees. As you may already know “8 Ton Bridge” main structural beams have deteriorated and show heavy signs of “stress dusting” when Los Altos Maintenance trucks cross. This was noted by prior Public Works Director Jim Sandoval before he retired and CEQA Construction Consultant last March. At my March 2024 on-site meeting with CEQA Construction Consultant, he was going to recommend equipment access via Manresa.

What is your estimated public release date for complete CEQA report? I am interested in creekbank soil core sample data from septic tank / drain field and lead contamination from water pipes.

Since you are also working on Adobe Creek Sewer Line replacement project, I would like to make you aware of major cost / environmental impact reduction by eliminating two creek crossings that only serve abandoned sewer line that may have never been hooked up to Halsey House.

Thank you for your consideration.



NATIVE AMERICAN HERITAGE COMMISSION

February 11, 2025

Harun Musaeftendic
City of Los Altos
1 N. San Antonio Road
Los Altos CA 94022

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Laurena Bolden
Serrano

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Bennae Calac
Pauma-Yuima Band of
Luiseño Indians

ACTING EXECUTIVE
SECRETARY
Steven Quinn

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Re: 2025020308 Halsey House Project, Santa Clara County

Dear Mr. Musaeftendic:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:

A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
 - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

- a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
- b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- a.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- c.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:

Mathew.Lin@NAHC.ca.gov.

Sincerely,

Mathew Lin

Mathew Lin
Cultural Resources Analyst

cc: State Clearinghouse

From: [Harun Musaefendic](#)
To: [Michael Lisenbee](#)
Cc: [Aida Fairman](#)
Subject: FW: Valley Water Comments on Notice of Preparation
Date: Thursday, March 20, 2025 4:11:44 PM

Hey Mike,

Received the following comments from Shree at Valley Water. I'll save them in our project folder but want to make sure you are aware of these comments as well.

Please let me know if you have any questions.

Thank you,

Harun Musaefendic, PE
Associate Civil Engineer

From: Shree Dharasker <sdharasker@valleywater.org>
Sent: Wednesday, March 19, 2025 10:12 AM
To: Harun Musaefendic <HMusaefendic@losaltosca.gov>
Cc: Josh Weinik <Jweinik@valleywater.org>
Subject: Valley Water Comments on Notice of Preparation

Dear Mr. Musaefendic:

The Santa Clara Valley Water District (Valley Water) has reviewed the February 6, 2025 Notice of Preparation for a draft Environmental Impact Report (EIR) for the Halsey House project in Los Altos, and has the following comments:

1. Please clarify if the "Native plant landscaping" described in the Project Description, aims to meet aesthetic needs or if an ecological restoration is planned
2. Biological resource consideration scope needs to include nearby Valley Water native plant mitigation site on Abode Creek at the Jesuit Retreat. This project should not impact Valley Water's mitigation site.
3. There are more sensitive habitats in addition to wetlands. Flagging for sensitive habitats such as redwood forest and riparian woodlands should be considered

The above comments should be addressed in the EIR. Valley Water has no right of way or ground water wells at this location. No encroachment permit will therefore be required. The site is in FEMA Flood Zone X (area determined to be outside the 500-year flood and protected by levee from 100- year flood),

Please contact me if there are any questions. Valley Water would like to review future environmental documents on this project,

Shree Dharasker
Associate Engineer Civil
Community Projects Review Unit
(408)630-3037

Halsey House Demolition Project Detailed Report

Table of Contents

Attachment 3 - Appendix B

- 1. Basic Project Information
 - 1.1. Basic Project Information
 - 1.2. Land Use Types
 - 1.3. User-Selected Emission Reduction Measures by Emissions Sector
- 2. Emissions Summary
 - 2.1. Construction Emissions Compared Against Thresholds
 - 2.2. Construction Emissions by Year, Unmitigated
- 3. Construction Emissions Details
 - 3.1. Demolition (2025) - Unmitigated
- 4. Operations Emissions Details
 - 4.10. Soil Carbon Accumulation By Vegetation Type
 - 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated
 - 4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated
 - 4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Halsey House Demolition Project
Construction Start Date	1/1/2025
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	32.8
Location	37.37293862875913, -122.11975058114137
County	Santa Clara
City	Los Altos
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1720
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.21

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Single Family Housing	1.00	Dwelling Unit	0.32	1,950	11,713	—	3.00	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.73	0.61	5.31	7.16	0.01	0.18	0.91	1.09	0.17	0.11	0.28	—	1,168	1,168	0.05	0.02	0.02	1,177
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.13	0.11	0.93	1.25	< 0.005	0.03	0.15	0.18	0.03	0.02	0.05	—	205	205	0.01	< 0.005	0.05	207
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.02	0.02	0.17	0.23	< 0.005	0.01	0.03	0.03	0.01	< 0.005	0.01	—	33.9	33.9	< 0.005	< 0.005	0.01	34.2

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.73	0.61	5.31	7.16	0.01	0.18	0.91	1.09	0.17	0.11	0.28	—	1,168	1,168	0.05	0.02	0.02	1,177

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.13	0.11	0.93	1.25	< 0.005	0.03	0.15	0.18	0.03	0.02	0.05	—	205	205	0.01	< 0.005	0.05	207
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.02	0.02	0.17	0.23	< 0.005	0.01	0.03	0.03	0.01	< 0.005	0.01	—	33.9	33.9	< 0.005	< 0.005	0.01	34.2

3. Construction Emissions Details

3.1. Demolition (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.68	0.56	5.16	6.67	0.01	0.18	—	0.18	0.17	—	0.17	—	994	994	0.04	0.01	—	997
Demolition	—	—	—	—	—	—	0.05	0.05	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	3.43	3.43	< 0.005	< 0.005	< 0.005	3.62
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	0.91	1.17	< 0.005	0.03	—	0.03	0.03	—	0.03	—	174	174	0.01	< 0.005	—	175
Demolition	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.12	0.12	< 0.005	0.01	0.01	—	0.60	0.60	< 0.005	< 0.005	< 0.005	0.63

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.17	0.21	< 0.005	0.01	—	0.01	0.01	—	0.01	—	28.9	28.9	< 0.005	< 0.005	—	29.0
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	—	0.10	0.10	< 0.005	< 0.005	< 0.005	0.10
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.04	0.44	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	99.2	99.2	< 0.005	< 0.005	0.01	101
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	27.0	27.0	< 0.005	< 0.005	< 0.005	28.2
Hauling	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	44.8	44.8	< 0.005	0.01	< 0.005	47.0
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	17.6	17.6	< 0.005	< 0.005	0.03	17.8
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.73	4.73	< 0.005	< 0.005	0.01	4.95
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.85	7.85	< 0.005	< 0.005	0.01	8.24
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.91	2.91	< 0.005	< 0.005	0.01	2.95
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.78	0.78	< 0.005	< 0.005	< 0.005	0.82
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.30	1.30	< 0.005	< 0.005	< 0.005	1.36

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2025	3/31/2025	5.00	64.0	Demolition of the Halsey House

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	2.00	6.00	84.0	0.37
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	1.00	367	0.40
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	1.00	8.00	36.0	0.38

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	12.5	11.7	LDA,LDT1,LDT2
Demolition	Vendor	1.00	8.40	HHDT,MHDT
Demolition	Hauling	0.63	20.0	HHDT
Demolition	Onsite truck	1.00	0.50	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
------------	--	--	--	--	-----------------------------

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	3,400	—

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Single Family Housing	0.01	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	204	0.03	< 0.005

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
--------------------------	----------------------	---------------	-------------

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
--------------------	---------------	-------------

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
-----------	--------	------------------------------	------------------------------

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	12.8	annual days of extreme heat
Extreme Precipitation	7.75	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	11.1	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events.

Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	2	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	2	1	1	3
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	14.9
AQ-PM	12.5
AQ-DPM	39.1
Drinking Water	51.4
Lead Risk Housing	27.9

Pesticides	40.9
Toxic Releases	40.9
Traffic	80.5
Effect Indicators	—
CleanUp Sites	64.7
Groundwater	83.5
Haz Waste Facilities/Generators	59.8
Impaired Water Bodies	23.9
Solid Waste	0.00
Sensitive Population	—
Asthma	0.44
Cardio-vascular	1.21
Low Birth Weights	13.9
Socioeconomic Factor Indicators	—
Education	8.99
Housing	9.81
Linguistic	29.5
Poverty	7.83
Unemployment	7.77

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	98.54998075
Employed	35.60887976
Median HI	99.88451174

Education	—
Bachelor's or higher	99.97433594
High school enrollment	100
Preschool enrollment	95.7141024
Transportation	—
Auto Access	90.86359553
Active commuting	67.58629539
Social	—
2-parent households	95.67560631
Voting	94.75170024
Neighborhood	—
Alcohol availability	91.55652509
Park access	22.12241755
Retail density	27.98665469
Supermarket access	21.22417554
Tree canopy	96.86898499
Housing	—
Homeownership	92.89105608
Housing habitability	97.51058642
Low-inc homeowner severe housing cost burden	81.32939818
Low-inc renter severe housing cost burden	92.05697421
Uncrowded housing	96.93314513
Health Outcomes	—
Insured adults	99.34556653
Arthritis	0.0
Asthma ER Admissions	99.5
High Blood Pressure	0.0

Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	96.9
Cognitively Disabled	78.9
Physically Disabled	89.8
Heart Attack ER Admissions	98.9
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	87.0
Elderly	7.7
English Speaking	86.8
Foreign-born	55.8
Outdoor Workers	81.0

Climate Change Adaptive Capacity	—
Impervious Surface Cover	91.2
Traffic Density	73.2
Traffic Access	49.4
Other Indices	—
Hardship	0.7
Other Decision Support	—
2016 Voting	93.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	3.00
Healthy Places Index Score for Project Location (b)	100
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Project would include only the demolition of the existing Halsey House. Demolition activities would last approximately three months.
Construction: Off-Road Equipment	Keeping default tractor/loader/backhoe, rubber tired dozer, and concrete/industrial saw engine tier and hours/day. Added excavator for 8 hours a day.



H. T. HARVEY & ASSOCIATES

Ecological Consultants



**Halsey House Demolition Project
Biological Resources Report**

Project #4814-01

Prepared for:

Mimi McNamara
David J. Powers & Associates
1871 The Alameda, Suite 200
San José, CA 95126



Prepared by:

H. T. Harvey & Associates



August 2, 2024

Table of Contents

Section 1.	Introduction.....	1
1.1	Project Location	1
1.2	Project Description	1
1.1.1	Background	1
1.1.2	Demolition Details.....	1
Section 2.	Methods.....	5
2.1	Background Review	5
2.2	Site Visit	5
Section 3.	Regulatory Setting.....	6
3.1	Federal Regulations.....	6
3.1.1	Clean Water Act.....	6
3.1.2	Rivers and Harbors Act.....	6
3.1.3	Federal Endangered Species Act	7
3.1.4	Federal Migratory Bird Treaty Act	8
3.2	State Regulations.....	8
3.2.1	Porter-Cologne Water Quality Control Act.....	8
3.2.2	California Endangered Species Act	9
3.2.3	Native Plant Protection Act	9
3.2.4	California Environmental Quality Act.....	9
3.2.5	California Fish and Game Code	11
3.2.6	State Water Resources Control Board Stormwater Regulation	12
3.3	Local Regulations	13
3.3.1	Los Altos Tree Protection Ordinance.....	13
3.3.2	Los Altos Watercourse Protection Regulations.....	14
Section 4.	Environmental Setting	15
4.1	General Project Area Description	15
4.2	Biotic Habitats	15
4.2.1	Developed	15
4.2.2	Coast Live Oak Woodland	18
4.3	Adjacent Habitat Areas.....	19
4.4	Wildlife Movement.....	20
Section 5.	Special-Status Species and Sensitive Habitats	21
5.1	Special-Status Plant Species	24
5.2	Special-Status Animal Species	26
5.3	Sensitive Natural Communities, Vegetation Alliances, and Habitats.....	37
5.3.1	Sensitive Natural Communities.....	37
5.3.2	Sensitive Vegetation Alliances.....	38
5.3.3	CDFW Riparian Habitat	38
5.3.4	Sensitive Habitats (Waters of the U.S./State).....	38
5.3.5	Nonnative and Invasive Species	38
Section 6.	Impacts and Mitigation Measures	39
6.1	Impacts on Special-Status Species	40
6.1.1	Impacts on Regionally Common Habitats and Associated Common Plant and Wildlife Species (Less than Significant)	40
6.1.2	Impacts on Water Quality and Special-Status Fish (Less than Significant)	40

6.1.3 Impacts on Nonbreeding Special-Status Invertebrates, Birds, and Mammals (Less than Significant)	41
6.1.4 Impacts on the White-Tailed Kite, Vaux's Swift, and Yellow Warbler (Less than Significant)	42
6.1.5 Impacts on the San Francisco Dusky-Footed Woodrat (Less than Significant with Mitigation)	42
6.1.6 Impacts on California Giant Salamander (Less than Significant)	44
6.1.7 Impacts on Common and Special-Status Roosting Bats (Less than Significant with Mitigation)	44
6.2 Impacts on Sensitive Communities	45
6.2.1 Impacts on Riparian Habitat or Other Sensitive Natural Communities (Less than Significant)	45
6.3 Impacts on Wetlands	46
6.4 Impacts on Wildlife Movement	46
6.4.1 Impacts on Wildlife Movement (Less than Significant)	46
6.5 Impacts due to Conflicts with Local Policies:	47
6.5.1 Impacts Due to the Removal of Ordinance-Sized Trees (Less than Significant)	47
6.5.2 Impacts Due to Encroachment into the Stream/Riparian Corridor (Less than Significant)	47
6.6 Impacts due to Conflicts with an Adopted Habitat Conservation Plan	48
6.7 Cumulative Impacts	49
Section 7. Compliance with Additional Laws and Regulations for Nesting Birds	50
Section 8. References	51

Figures

Figure 1. Vicinity Map	3
Figure 2. Project Site	4
Figure 3. Biotic Habitats	16
Figure 4. CNDDB-Mapped Records of Special-Status Plants	22
Figure 5. CNDDB-Mapped Records of Special-Status Animals	23

Tables

Table 1. Special-Status Plant Species, Their Status, and Potential for Occurrence on the Project Site	25
Table 2. Special-Status Animal Species, Their Status, and Potential for Occurrence on the Project Site	28

Appendices

Appendix A. Plants Observed	A-1
Appendix B. Special-Status Plants Considered but Rejected for Occurrence	B-1

List of Preparers

Steve Rottenborn, Ph.D., Principal/Senior Wildlife Ecologist

Kelly Hardwicke, Ph.D., Principal/Senior Plant and Wetlands Ecologist

Robin Carle, M.S., Project Manager/Senior Wildlife Ecologist

Vanessa Morales, B.S., Plant and Wetlands Ecologist

Zachary Hampson, B.A., Wildlife Ecologist

Emily Malkauskas, B.S., Wildlife Ecologist

Section 1. Introduction

This report describes the biological resources present in the area of the proposed Halsey House Demolition project, the potential impacts of the proposed project on biological resources, and measures necessary to reduce project impacts to less-than-significant levels under the California Environmental Quality Act (CEQA). This assessment is based on the project maps and description provided to H. T. Harvey & Associates by David J. Powers & Associates through July 2024.

1.1 Project Location

The 0.6-acre project site is located within the Redwood Grove Nature Preserve in Los Altos, California (Figures 1 and 2). The Preserve is surrounded by residential development, with University Avenue located to the east, Manresa Lane to the south, Lennox Way and Fremont Road to the west, and Shoup Park to the north. The project site is located on the *Cupertino, California* 7.5-minute United States Geological Survey (USGS) quadrangle.

1.2 Project Description

1.1.1 Background

The Halsey House was built in 1923 and used as a private residence until the property was purchased by the City of Los Altos in 1974 to serve as a park. The building was then converted to a nature center for educational and recreational programming. In 2008, the building was closed to the public. Since 2008, the Halsey House has remained vacant and unused. The Halsey House is a local Historic Landmark and is eligible for the California Register of Historic Resources. As a result, it is considered a historic resource under CEQA.

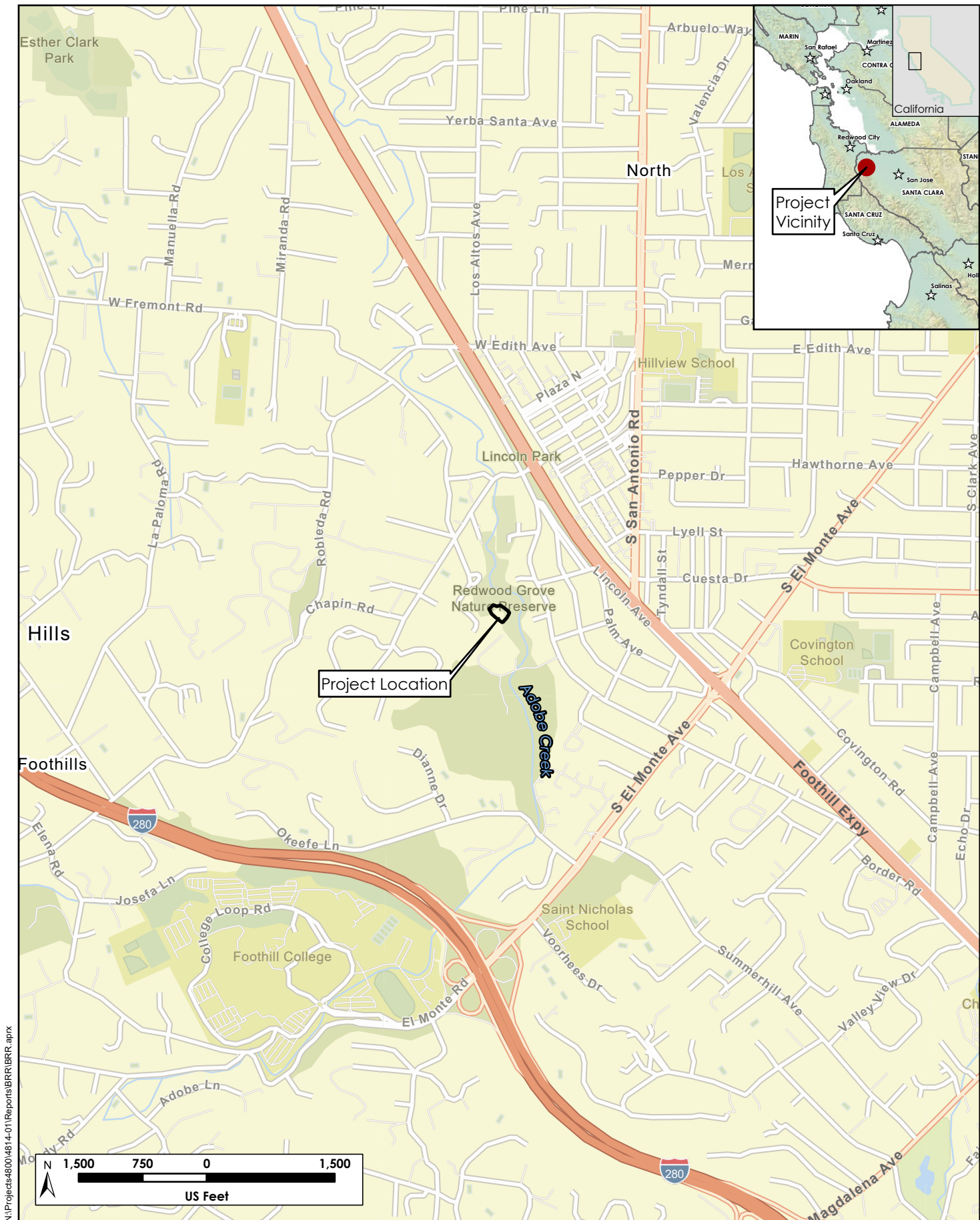
1.1.2 Demolition Details

The project proposes to demolish the Halsey House building. Demolition activities would occur within an approximately 0.6-acre area surrounding the building and would last roughly three months. Equipment and workers would access the site via the Redwood Grove Nature Preserve entrance on University Avenue. Equipment staging would occur within the proposed area of disturbance.

Demolition equipment, such as an excavator and a compact track loader, would be utilized throughout the demolition period. Due to the weight capacity and width of the pedestrian bridge (approximately 8 tons and 10 feet, respectively), the equipment used for demolition would be small and lightweight. For example, the compact track loader would weigh 7 tons and the excavator would weigh 6 tons.

Service utility trucks weighing about 4 tons would be used for hauling. The service trucks would be able to hold a maximum of 3 tons. When hauling materials off-site the service utility trucks would weigh 7 tons total.

During demolition, construction equipment and manual labor would be used to tear down the Halsey House structure. Some of the demolition would be completed manually with hand tools due to the weight and width constraints of the pedestrian bridge. After demolition of the building, the site would be cleared and building materials would be hauled to an appropriate off-site disposal location. Some tree trimming and/or removal may be necessary to allow for demolition of the building.



N:\Projects\4800\4814-01\Reports\BRR\BRR.aprx



H. T. HARVEY & ASSOCIATES
Ecological Consultants

Figure 1. Vicinity Map
Halsey House Demolition Project Biological Resources Report (4814-01)
August 2024



N:\Projects\4800\4814-01\Reports\BRR\BRR.aprx



H. T. HARVEY & ASSOCIATES
Ecological Consultants

Figure 2. Project Site
Halsey House Demolition Project Biological Resources Report (4814-01)
August 2024

Section 2. Methods

2.1 Background Review

Prior to conducting field work, H. T. Harvey & Associates ecologists reviewed the project description and site plan provided by David J. Powers & Associates through July 2024; aerial images (Google Inc. 2024); a USGS topographic map; a National Wetlands Inventory map (2024); National Resources Conservation Service (NRCS) soil survey maps (2024); the California Department of Fish and Wildlife's (CDFW's) California Natural Diversity Database (CNDDB) (2024); and other relevant reports, scientific literature, and technical databases. For the purposes of this report, the *project vicinity* is defined as the area within a 5-mile radius surrounding the project site.

In addition, for plants, we reviewed all species on current California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) 1A, 1B, 2A, 2B, 3, and 4 lists (CNPS 2024) occurring in the project region, which is defined as the *Cupertino, California* USGS 7.5-minute quadrangle and surrounding eight quadrangles (*Palo Alto, Mountain View, Milpitas, San Jose West, Mindero Hill, Big Basin, Castle Rock Ridge, and Los Gatos*). In addition, we queried the CNDDB (2024) for natural communities of special concern that occur on the project site, and we perused records of birds reported in nearby areas, such as at Redwood Grove Nature Preserve and Shoup Park, on eBird (Cornell Lab of Ornithology 2024) and on the Peninsula-Birding List Serve (2024).

2.2 Site Visit

H. T. Harvey & Associates plant and wetland ecologist Vanessa Morales, B.S., and wildlife ecologist Zachary Hampson, B.A., conducted a reconnaissance-level survey of the project site on May 7, 2024. The purpose of the surveys was to provide an impact assessment specific to the proposed construction of the project, as described above. Specifically, surveys were conducted to (1) assess existing biotic habitats and plant and animal communities on the project site, (2) assess the project site for its potential to support special-status species and their habitats, and (3) identify potential jurisdictional and sensitive habitats, such as waters of the U.S./state and riparian habitat. V. Morales conducted a focused presence/absence survey for bent-flowered fiddleneck (*Amsinkia lunaris*), arcuate bush mallow (*Malacothamnus arcuatus* var. *arcuatus*), Dudley's lousewort (*Pedicularis dudleya*), and California bottlebrush (*Ehymus californicus*), four special-status plants that were thought to have some potential for occurrence and that would have been detectable during the May 7 site visit, on the project site. Z. Hampson conducted a focused survey for roosting bats and signs of bat presence (e.g., guano and urine staining) in the existing Halsey House structure as well as in trees on the site, as well as a focused survey for nests of the San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*). In addition, Z. Hampson and H. T. Harvey & Associates wildlife ecologist Emily Malkauskas, B.S., returned to the site on May 16, 2024, to conduct a dusk emergence survey for roosting bats.

Section 3. Regulatory Setting

Biological resources on the project site are regulated by a number of federal, state, and local laws and ordinances, as described below.

3.1 Federal Regulations

3.1.1 Clean Water Act

The Clean Water Act (CWA) functions to maintain and restore the physical, chemical, and biological integrity of waters of the U.S., which include, but are not limited to, tributaries to traditionally navigable waters currently or historically used for interstate or foreign commerce, and adjacent wetlands. Historically, in non-tidal waters, U.S. Army Corps of Engineers (USACE) jurisdiction extends to the ordinary high water (OHW) mark, which is defined in Title 33, Code of Federal Regulations, Part 328.3. If there are wetlands adjacent to channelized features, the limits of USACE jurisdiction extend beyond the OHW mark to the outer edges of the wetlands. In tidal waters, USACE jurisdiction extends to the landward extent of vegetation associated with salt or brackish water or the high tide line. The high tide line is defined in 33 Code of Federal Regulations Part 328.3 as “the line of intersection of the land with the water’s surface at the maximum height reached by a rising tide.” The May 25, 2023 U.S. Supreme Court decision in *Sackett v. Environmental Protection Agency* limited the definition of waters of the U.S. by including only wetlands that have a continuous surface connection with traditional navigable waters. On August 29, 2023, the U.S. Environmental Protection Agency and USACE issued a final implementing rule to amend the definition of waters of the U.S. to conform with the *Sackett* decision.

Construction activities within jurisdictional waters are regulated by the USACE. The placement of fill into such waters must comply with permit requirements of the USACE. No USACE permit will be effective in the absence of Section 401 Water Quality Certification. The State Water Resources Control Board (SWRCB) is the state agency (together with the Regional Water Quality Control Boards [RWQCBs]) charged with implementing water quality certification in California.

Project Applicability: The project site does not support wetland or aquatic habitats. Adobe Creek, located approximately 16 feet off-site to the northeast, is considered jurisdictional waters of the U.S. under the CWA, but no project activities are proposed within the bed and banks of the creek. As a result, a permit from the USACE would not be required for the project.

3.1.2 Rivers and Harbors Act

Section 10 of the Rivers and Harbors Act of 1899 prohibits the creation of any obstruction to the navigable capacity of waters of the U.S., including discharge of fill and the building of any wharfs, piers, jetties, and other structures without Congressional approval or authorization by the Chief of Engineers and Secretary of the Army (33 U.S.C. 403).

Navigable waters of the U.S., which are defined in 33 CFR, Part 329.4, include all waters subject to the ebb and flow of the tide, and/or those which are presently or have historically been used to transport commerce. The shoreward jurisdictional limit of tidal waters is further defined in 33 CFR, Part 329.12 as “the line on the shore reached by the plane of the mean (average) high water.” It is important to understand that the USACE does not regulate wetlands under Section 10, only the aquatic or open waters component of bay habitat, and that there is overlap between Section 10 jurisdiction and Section 404 jurisdiction. According to 33 CFR, Part 329.9, a waterbody that was once navigable in its natural or improved state retains its character as “navigable in law” even though it is not presently used for commerce as a result of changed conditions and/or the presence of obstructions. Historical Section 10 waters may occur behind levees in areas that are not currently exposed to tidal or muted-tidal influence, and meet the following criteria: (1) the area is presently at or below the mean high water line; (2) the area was historically at or below mean high water in its “unobstructed, natural state”; and (3) there is no evidence that the area was ever above mean high water.

As mentioned above, Section 404 of the CWA authorizes the USACE to issue permits to regulate the discharge of dredged or fill material into waters of the U.S. If a project also proposes to discharge dredged or fill material and/or introduce other potential obstructions in navigable waters of the U.S., a Letter of Permission authorizing these impacts must be obtained from the USACE under Section 10 of the Rivers and Harbors Act.

Project Applicability: No current or historical Section 10 Waters are present on or close to the project site, including in Adobe Creek located off-site to the northeast. Therefore, a Letter of Permission from the USACE is not required.

3.1.3 Federal Endangered Species Act

The Federal Endangered Species Act (FESA) protects federally listed wildlife species from harm or *take*, which is broadly defined as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in any such conduct.” *Take* can also include habitat modification or degradation that directly results in death or injury of a listed wildlife species. An activity can be defined as *take* even if it is unintentional or accidental. Listed plant species are provided less protection than listed wildlife species. Listed plant species are legally protected from take under the FESA only if they occur on federal lands.

The U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service have jurisdiction over federally listed, threatened, and endangered species under FESA. The USFWS also maintains lists of proposed and candidate species. Species on these lists are not legally protected under FESA, but may become listed in the near future and are often included in their review of a project.

Project Applicability: The May 2024 site visit determined that no federally listed plant species are present on the project site. The monarch butterfly (*Danaus plexippus*), a candidate for listing under FESA, may occur on the project site as an occasional nonbreeding forager or dispersant, but it is not expected to breed on the project

site or to be impacted substantively by the project. No additional federally listed or candidate plant or animal species occur or potentially occur on the project site.

3.1.4 Federal Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA), 16 U.S.C. Section 703, prohibits killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. The MBTA protects whole birds, parts of birds, and bird eggs and nests, and it prohibits the possession of all nests of protected bird species whether they are active or inactive. An *active* nest is defined as having eggs or young, as described by the USFWS in its June 14, 2018 memorandum “Destruction and Relocation of Migratory Bird Nest Contents”. Nest starts (nests that are under construction and do not yet contain eggs) and inactive nests are not protected from destruction.

Project Applicability: All native bird species that occur on the project site are protected under the MBTA.

3.2 State Regulations

3.2.1 Porter-Cologne Water Quality Control Act

The SWRCB works in coordination with the nine RWQCBs to preserve, protect, enhance, and restore water quality. Each RWQCB makes decisions related to water quality for its region, and may approve, with or without conditions, or deny projects that could affect waters of the state. Their authority comes from the CWA and the Porter-Cologne Water Quality Control Act (Porter-Cologne). Porter-Cologne broadly defines waters of the state as “any surface water or groundwater, including saline waters, within the boundaries of the state.” Because Porter-Cologne applies to any water, whereas the CWA applies only to certain waters, California’s jurisdictional reach overlaps and may exceed the boundaries of waters of the U.S. For example, Water Quality Order No. 2004-0004-DWQ states that “shallow” waters of the state include headwaters, wetlands, and riparian areas. Moreover, the San Francisco Bay Region RWQCB’s Assistant Executive Director has stated that, in practice, the RWQCBs claim jurisdiction over riparian areas. Where riparian habitat is not present, such as may be the case at headwaters, jurisdiction is taken to the top of bank.

On April 2, 2019, the SWRCB adopted the *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State*. In these new guidelines, riparian habitats are not specifically described as waters of the state but instead as important buffer habitats to streams that do conform to the State Wetland Definition. The *Procedures* describe riparian habitat buffers as important resources that may both be included in required mitigation packages for permits for impacts to waters of the state, as well as areas requiring permit authorization from the RWQCBs to impact.

Pursuant to the CWA, projects that are regulated by the USACE must also obtain a Section 401 Water Quality Certification permit from the RWQCB. This certification ensures that a proposed project will uphold state water quality standards. Because California’s jurisdiction to regulate its water resources is much broader than

that of the federal government, proposed impacts on waters of the state require Water Quality Certification even if the area occurs outside of USACE jurisdiction. Moreover, the RWQCB may impose mitigation requirements even if the USACE does not. Under the Porter-Cologne, the SWRCB and the nine regional boards also have the responsibility of granting CWA National Pollutant Discharge Elimination System (NPDES) permits and Waste Discharge Requirements for certain point-source and non-point discharges to waters. These regulations limit impacts on aquatic and riparian habitats from a variety of urban sources.

Project Applicability: No waters of the state or riparian habitats regulated by the RWQCB are present on the project site. Adobe Creek located off-site to the northeast is considered waters of the state, but no impacts to this creek will result from project activities. Therefore, a Section 401 permit or Waste Discharge Requirement from the RWQCB would not be required.

3.2.2 California Endangered Species Act

The California Endangered Species Act (CESA) (California Fish and Game Code, Chapter 1.5, Sections 2050-2116) prohibits the take of any plant or animal listed or proposed for listing as rare (plants only), threatened, or endangered. In accordance with CESA, the CDFW has jurisdiction over state-listed species (Fish and Game Code 2070). The CDFW regulates activities that may result in *take* of individuals (i.e., “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”). Habitat degradation or modification is not expressly included in the definition of *take* under the California Fish and Game Code. The CDFW, however, has interpreted *take* to include the “killing of a member of a species which is the proximate result of habitat modification.”

Project Applicability: The May 2024 site visit determined that no state-listed plant species occur on the project site. The mountain lion (*Puma concolor*), a candidate for listing under CESA, may occur on the site occasionally as a nonbreeder, but no impacts to individuals will result from the project.

3.2.3 Native Plant Protection Act

The Native Plant Protection Act (NPPA), enacted in 1977, allows plants to be designated as rare or endangered by the California Fish and Game Commission (Fish and Game Code Sections 1900–1913). The NPPA includes prohibitions on the take of such plants, with exceptions for certain activities. A total of 64 species, subspecies, and varieties of plants are considered “rare” by the NPPA.

Project Applicability: The May 2024 site visit determined that no NPPA-designated rare plant species occur on the project site.

3.2.4 California Environmental Quality Act

CEQA is a state law that requires state and local agencies to document and consider the environmental implications of their actions and to refrain from approving projects with significant environmental effects if there are feasible alternatives or mitigation measures that can substantially lessen or avoid those effects. CEQA

requires the full disclosure of the environmental effects of agency actions, such as approval of a general plan update or the projects covered by that plan, on resources such as air quality, water quality, cultural resources, and biological resources. The State Resources Agency promulgated guidelines for implementing CEQA known as the State CEQA Guidelines.

Section 15380(b) of the State CEQA Guidelines provides that a species not listed on the federal or state lists of protected species may be considered rare if the species can be shown to meet certain specified criteria. These criteria have been modeled after the definitions in the FESA and the CESA and the section of the California Fish and Game Code dealing with rare or endangered plants and animals. This section was included in the guidelines primarily to deal with situations in which a public agency is reviewing a project that may have a significant effect on a species that has not yet been listed by either the USFWS or CDFW or species that are locally or regionally rare.

The CDFW has produced three lists (amphibians and reptiles, birds, and mammals) of “species of special concern” that serve as “watch lists”. Species on these lists are of limited distribution or the extent of their habitats has been reduced substantially, such that threat to their populations may be imminent. Thus, their populations should be monitored. They may receive special attention during environmental review as potential rare species, but do not have specific statutory protection. All potentially rare or sensitive species, or habitats capable of supporting rare species, are considered for environmental review per the CEQA Section 15380(b). The CNPS, a non-governmental conservation organization, has developed CRPRs for plant species of concern in California in the CNPS Inventory of Rare and Endangered Plants (CNPS 2024). The CRPRs include lichens, vascular, and non-vascular plants, and are defined as follows:

- CRPR 1A Plants considered extinct.
- CRPR 1B Plants rare, threatened, or endangered in California and elsewhere.
- CRPR 2A Plants considered extinct in California but more common elsewhere.
- CRPR 2B Plants rare, threatened, or endangered in California but more common elsewhere.
- CRPR 3 Plants about which more information is needed - review list.
- CRPR 4 Plants of limited distribution-watch list.

The CRPRs are further described by the following threat code extensions:

- .1—seriously endangered in California;
- .2—fairly endangered in California;
- .3—not very endangered in California.

Although the CNPS is not a regulatory agency and plants on these lists have no formal regulatory protection, plants appearing as CRPR 1B or 2 are, in general, considered to meet CEQA’s Section 15380 criteria, and

adverse effects to these species may be considered significant. Impacts on plants that are listed by the CNPS on CRPR 3 or 4 are also considered during CEQA review, although because these species are typically not as rare as those of CRPR 1B or 2, impacts on them are less frequently considered significant.

Compliance with CEQA Guidelines Section 15065(a) requires consideration of natural communities of special concern, in addition to plant and wildlife species. Vegetation types of “special concern” are tracked in Rarefind (CNDDDB 2024). Further, the CDFW ranks sensitive vegetation alliances based on their global (G) and state (S) rankings analogous to those provided in the CNDDDB. Global rankings (G1–G5) of natural communities reflect the overall condition (rarity and endangerment) of a habitat throughout its range, whereas S rankings are a reflection of the condition of a habitat within California. If an alliance is marked as a G1–G3, all of the associations within it would also be of high priority. The CDFW provides the Vegetation Classification and Mapping Program’s (VegCAMP’s) currently accepted list of vegetation alliances and associations (CDFW 2024).

Project Applicability: All potential impacts on biological resources will be considered during CEQA review of the project in the context of this biological resources report. Project impacts are discussed in Section 6 below.

3.2.5 California Fish and Game Code

Ephemeral and intermittent streams, rivers, creeks, dry washes, sloughs, blue line streams on USGS maps, and watercourses with subsurface flows fall under CDFW jurisdiction. Canals, aqueducts, irrigation ditches, and other means of water conveyance may also be considered streams if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife. A *stream* is defined in Title 14, California Code of Regulations Section 1.72, as “a body of water that follows at least periodically or intermittently through a bed or channel having banks and that supports fish and other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation.” Using this definition, CDFW extends its jurisdiction to encompass riparian habitats that function as a part of a watercourse. California Fish and Game Code Section 2786 defines *riparian habitat* as “lands which contain habitat which grows close to and which depends upon soil moisture from a nearby freshwater source.” The lateral extent of a stream and associated riparian habitat that would fall under the jurisdiction of CDFW can be measured in several ways, depending on the particular situation and the type of fish or wildlife at risk. At minimum, CDFW would claim jurisdiction over a stream’s bed and bank. Where riparian habitat is present, the outer edge of riparian vegetation is generally used as the line of demarcation between riparian and upland habitats.

Pursuant to California Fish and Game Code Section 1603, CDFW regulates any project proposed by any person that will “substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by the department, or use any material from the streambeds.” California Fish and Game Code Section 1602 requires an entity to notify CDFW of any proposed activity that may modify a river, stream, or lake. If CDFW determines that proposed activities may substantially adversely affect fish and wildlife resources, a Lake and Streambed Alteration Agreement (LSAA) must be prepared. The LSAA sets

reasonable conditions necessary to protect fish and wildlife, and must comply with CEQA. The applicant may then proceed with the activity in accordance with the final LSAA.

Certain sections of the California Fish and Game Code describe regulations pertaining to protection of certain wildlife species. For example, Code Section 2000 prohibits take of any bird, mammal, fish, reptile, or amphibian except as provided by other sections of the code.

The California Fish and Game Code Sections 3503, 3513, and 3800 (and other sections and subsections) protect native birds, including their nests and eggs, from all forms of take. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered *take* by the CDFW. Raptors (e.g., eagles, hawks, and owls) and their nests are specifically protected in California under Code Section 3503.5. Section 3503.5 states that it is “unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.”

Bats and other non-game mammals are protected by California Fish and Game Code Section 4150, which states that all non-game mammals or parts thereof may not be taken or possessed except as provided otherwise in the code or in accordance with regulations adopted by the commission. Activities resulting in mortality of non-game mammals (e.g., destruction of an occupied nonbreeding bat roost, resulting in the death of bats), or disturbance that causes the loss of a maternity colony of bats (resulting in the death of young), may be considered *take* by the CDFW.

Project Applicability: No riparian habitat regulated by the CDFW occurs on the project site. Adobe Creek and associated riparian habitat located off-site to the northeast is regulated by CDFW, but no impacts to riparian habitat along this creek will result from activities under the project. Therefore, a CDFW LSAA would not be required for the project.

Most native bird, mammal, and other wildlife species that occur on the project site and in the immediate vicinity are protected under the California Fish and Game Code. Project impacts on these species are discussed in Section 6.

3.2.6 State Water Resources Control Board Stormwater Regulation

Construction Phase. Construction projects in California causing land disturbances that are equal to 1 acre or greater must comply with state requirements to control the discharge of stormwater pollutants under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit; Water Board Order No. 2009-0009-DWQ, as amended and administratively extended). Prior to the start of construction/demolition, a Notice of Intent must be filed with the SWRCB describing the project. A Storm Water Pollution Prevention Plan must be developed and maintained during the project and it must include the use of best management practices (BMPs) to protect water quality until the site is stabilized.

Standard permit conditions under the Construction General Permit requires that the applicant utilize various measures including: on-site sediment control BMPs, damp street sweeping, temporary cover of disturbed land surfaces to control erosion during construction, and utilization of stabilized construction entrances and/or wash racks, among other factors. Additionally, the Construction General Permit does not extend coverage to projects if stormwater discharge-related activities are likely to jeopardize the continued existence, or result in take of any federally listed endangered or threatened species.

Post-Construction Phase. In many Bay Area counties, including Santa Clara County, projects must also comply with the California RWQCB, San Francisco Bay Region, Municipal Regional Stormwater NPDES Permit (Water Board Order No. R2-2015-0049, as amended). This permit requires that all projects implement BMPs and incorporate Low Impact Development practices into the design that prevent stormwater runoff pollution, promote infiltration, and hold/slow down the volume of water coming from a site. In order to meet these permit and policy requirements, projects must incorporate the use of green roofs, impervious surfaces, tree planters, grassy swales, bioretention and/or detention basins, among other factors.

Project Applicability. The project will not disturb an acre or more of ground, so the NPDES General Permit would not apply to this project. It is our understanding that the Municipal Regional Stormwater NPDES Permit would apply; however, and the project will comply with the requirements of this permit. Therefore, construction-phase activities would not result in detrimental water quality effects on biological or regulated resources.

3.3 Local Regulations

3.3.1 Los Altos Tree Protection Ordinance

According to the City's Municipal Code Chapter 11.08, it is unlawful to damage or kill any protected tree, or to remove any protected tree from private or public property without obtaining a permit. A protected tree is defined as trees that are 48 inches in circumference at 48 inches above grade, designated by the historical commission as a heritage tree (or that is under consideration for designation as a heritage tree), or any tree that was required by the City to be saved or planted in conjunction with a development review application. City requirements to protect trees designated for preservation during construction include installing protective fencing; maintaining the existing grade out to the dripline of the tree; installing drain wells where impervious surfaces will be placed over a tree's root system; repairing trees that are damaged by construction, and avoiding attachment of signs, wires, or other objects to the tree. Conditions approval for tree removal may include planting replacement trees.

Project Applicability: The project will comply with the City's requirements for any trees that need to be removed.

3.3.2 Los Altos Watercourse Protection Regulations

The City's Municipal Code Chapter 6.32 requires creeks to be maintained reasonably free of trash, debris, excessive vegetation, and other obstacles that would pollute, contaminate, or significantly retard the flow of water. Any discharge into creeks, modification of the natural flow of water, development of permanent structures, earthwork, fence construction, removal of materials from, or placement of materials within a creek requires a permit.

In addition, all parcels along Adobe Creek from Shoup Park south to O'Keefe Lane are subject to a setback equivalent to the greatest of the following distances:

- 40 feet (for parcels 3 acres in size or smaller) or 80 feet (for parcels larger than 3 acres) from the top of the nearest bank,
- The distance of any easement owned or controlled by the Santa Clara Valley Water District, or
- The 100-year floodplain.

No construction activities including structures, grading, paving, fences, water storage facilities, and subsoil disturbance; dumping; use of herbicides or pesticides; or removal of vegetation may occur except with permission from the planning department. Pathways, access roads, utilities, bridges, and fire and flood control measures are allowed. Exceptions are available for special circumstances (e.g., size, shape, and topography) where the proposed activity will not be detrimental to the health, safety, or welfare of persons living or working in the vicinity and is consistent with the purposes of the setbacks as provided.

Project Applicability: No streams are present on the project site. Due to the presence of Adobe Creek approximately 16 feet to the northeast, and because the project site is located in between Shoup Park to the north and O'Keefe Lane to the south, a setback overlaps the project site. The size of the parcel on which the project site is located is 4.3 acres; therefore, the setback defined by the City for this location is 80 feet from the top of bank. The project would need to comply with the City's watercourse protection regulations, which include guidance for allowable uses within the stream corridor. It is our understanding that the City will grant an exception to the 80-foot setback for the project, as the proposed removal of Halsey House will result in returning the area to its natural grade and vegetation, a net benefit to the Adobe Creek corridor.

Section 4. Environmental Setting

4.1 General Project Area Description

The project site is located in the City of Los Altos in Santa Clara County, California (Figure 1). The climate in the project vicinity is coastal Mediterranean, with most rain falling in the winter and spring. Mild cool temperatures are common in the winter, and hot to mild temperatures are common in the summer. Climate conditions in the vicinity include a 30-year average of 18.68 inches of annual precipitation with a monthly average temperature range from 48.5°F to 71.4°F (PRISM Climate Group 2024). Elevations on the project site range from 203–223 feet above mean sea level (Google Inc. 2024). The NRCS has mapped one soil unit on the project site: Urban land-Flaskan complex 2 to 9% slopes (NRCS 2024). Urban land-Flaskan complex is a well-drained soil found on alluvial fans, and is composed of sandy loam, sandy clay loam, gravelly sandy clay loam, and very gravelly sandy loam (NRCS 2024).

4.2 Biotic Habitats

The reconnaissance-level survey identified two biotic habitats on the project site: developed and coast live oak woodland (Figure 3). These biotic habitats are described in detail below. Plant species observed during the reconnaissance-level survey are listed in Appendix A.

4.2.1 Developed

Vegetation. Approximately 0.3 acre of the project site is developed and supports the unoccupied Halsey House building, associated seating areas, an ornamental garden, and an equipment shed (Photo 1). Trees growing in the developed area on the site include native coast live oak (*Quercus agrifolia*) and California bay (*Umbellularia californica*) along with nonnative pepper tree (*Schinus molle*) and persimmon (*Diospyros virginiana*). Understory plants in this area include Douglas iris (*Iris douglasiana*), marah (*Marah fabacea*), privet (*Ligustrum* sp.), annual blue grass (*Poa annua*), foxtail barley (*Hordeum murinum*), and English ivy (*Hedera helix*). Native California poppy (*Eschscholzia californica*), hummingbird sage (*Salvia spathacea*), purple sage (*Salvia leucophylla*), black sage (*Salvia mellifera*), California gooseberry (*Ribes californicum*), coffeeberry (*Frangula californica*), and strawberry (*Fragaria* sp.) are present in the ornamental garden. In addition, nonnative French broom (*Genista monspessulana*) is present adjacent to the Halsey House building.



Photo 1. Developed habitat on the project site.



N:\Projects\4800\4814-01\Reports\BRR\BRR.aprx



H. T. HARVEY & ASSOCIATES
Ecological Consultants

Figure 3. Biotic Habitats
Halsey House Demolition Project Biological Resources Report (4814-01)
August 2024

Wildlife. Developed areas of the project site serve as wildlife habitat only in a very limited capacity, and most wildlife species that occur in these areas are tolerant of frequent human disturbances. Common wildlife species that are associated with developed areas and can occur in developed portions of the project site include the nonnative European starling (*Sturnus vulgaris*), house mouse (*Mus musculus*), and black rat (*Rattus rattus*), as well as the native western fence lizard (*Sceloporus occidentalis*), raccoon (*Procyon lotor*), and a variety of birds including the Anna’s hummingbird (*Calypte anna*), dark-eyed junco (*Junco hyemalis*), American crow (*Corvus brachyrhynchos*), and northern mockingbird (*Mimus polyglottos*). The buildings on the project site may be attractive to certain bird species in the area that nest on buildings such as the black phoebe (*Sayornis nigricans*), Bewick’s wren (*Thryomanes bewickii*), mourning dove (*Zenaida macroura*), and house finch (*Haemorrhous mexicanus*).

The Halsey House building provides suitable roosting habitat for bats, and an individual Townsend’s big-eared bat (*Corynorhinus townsendii*) was observed roosting in the building during the May 7, 2024 site visit. During the May 16, 2024 dusk emergence survey, two California myotis (*Myotis californicus*) and one Townsend’s big-eared bat were recorded flying overhead with acoustic detectors. In addition, an acoustic detector was left inside the Halsey House building for five nights, during which time 20 Townsend’s big-eared bat calls (which may have been produced by one or several individuals) were recorded (Table 1). Based on the relatively small number of calls detected each night (i.e., 1–7 calls per night), as well as their timing, we determined in consultation with H. T. Harvey & Associates senior bat biologist David Johnston, Ph.D., that the Townsend’s big-eared bat(s) using the building represent a non-maternity roost of a small number of individuals. This was determined based on the detection of calls only in the late evening and early morning, when the bats exited and returned to the roost, as opposed to numerous call detections throughout the night (which is typical when adults are feeding young). This roost likely consists of one or a few individual male bats, which is typical of this species.

Table 1. Summary of Townsend’s Big-Eared Bat Calls Detected Inside Halsey House from May 16–21, 2024

Date	Time				Total Calls Recorded
	midnight	6am	noon	6pm	
16-May				4	4
17-May	2	1		4	7
18-May				1	1
19-May				3	3
20-May	1			3	4
21-May		1			1

4.2.2 Coast Live Oak Woodland

Vegetation. Coast live oak woodland makes up 0.3 acre of the project site. This habitat is dominated by coast live oaks, which are interspersed with several other tree species including native California bay, California buckeye (*Aesculus californica*), and valley oak (*Quercus lobata*) as well as nonnative tree of heaven (*Ailanthus altissima*). Shrubs that occur in the midstory of this habitat include native toyon (*Heteromeles arbutifolia*) and poison oak (*Toxicodendron diversilobum*). The understory is mainly composed of leaf duff and large patches of nonnative Italian thistle (*Carduus pycnocephalus*) and ripgut brome (*Bromus diandrus*) with smaller numbers of native California blackberry (*Rubus ursinus*), foxtail barley, rose clover (*Trifolium hirtum*), California buttercup (*Ranunculus californica*), common bedstraw (*Galium aparine*), and miners lettuce (*Claytonia perfoliata*) as well as nonnative curly dock (*Rumex crispus*).



Photo 2. Coast live oak woodland habitat on the project site.

Wildlife. Woodlands dominated by oaks typically support diverse animal communities in California. Coast live oaks provide abundant food resources, including acorns and invertebrates, as well as substantial shelter for animals in the form of cavities, crevices in bark, and complex branching growth. The oak woodland habitat on the project site is part of a larger woodland (including oaks, redwoods [*Sequoia sempervirens*], and other trees) at the Redwood Grove Nature Preserve, and is connected to open space areas supporting woodlands and grasslands to the south between the site and Interstate 280 by Adobe Creek. However, the oak woodland habitat on the site is limited in extent, and the Redwood Grove Nature Preserve and other open spaces along Adobe Creek to the south are isolated from more extensive oak woodland habitats in the region (e.g., large parks in the foothills several miles to the southwest) by residential development and roadways. As a result, the oak woodland habitat on the site provides fewer resources and foraging opportunities for wildlife species compared to more extensive oak woodlands in the region. Nevertheless, due to the high quality of this habitat on the site, the close proximity of riparian habitat associated with Adobe Creek (located approximately 16 feet to the north), and the presence of numerous remnant oaks in the urban forest of the surrounding residential development, a number of wildlife species associated with oak woodlands and tolerant of moderate levels of human disturbance are expected to utilize the coast live oak woodland habitat on the site for breeding and foraging.

Birds such as the chestnut-backed chickadee (*Poecile rufescens*), Anna's hummingbird, bushtit (*Psaltirparus minimus*), Bewick's wren, oak titmouse (*Baeolophus inornatus*), and California scrub-jay (*Aphelocoma californica*) may nest and forage in oaks on the project site. Other birds expected to use this habitat are the wintering hermit thrush (*Catharus guttatus*), ruby-crowned kinglet (*Regulus calendula*), Townsend's warbler (*Setophaga townsendi*), and white-crowned sparrow (*Zonotrichia leucophrys*). Raptors such as the Cooper's hawk (*Accipiter cooperii*) may forage for prey in oak woodlands on the site in small numbers. It is possible that up to one pair of raptors could nest

in the patches of oak woodland habitat on the site, but no active or inactive raptor nests were detected during the site visit, suggesting that raptors have not nested on the site in recent years.

Common amphibians such as the Pacific tree frog (*Pseudacris regilla*) and California slender salamander (*Batrachoseps attenuatus*) may take refuge in leaf duff and forage within oak woodland habitat on the project site. Mammals, including the native bobcat (*Lynx rufus*), coyote (*Canis latrans*), raccoon, and black-tailed deer (*Odocoileus hemionus*) as well as the nonnative eastern gray squirrel (*Sciurus carolinensis*) and Virginia opossum (*Didelphis virginiana*) will forage in the oak woodland habitat on the project site. Additionally, several nests of the native San Francisco dusky footed woodrat, a California species of special concern, are present in this habitat, as are several burrows of Botta's pocket gophers (*Thomomys bottae*). The deer mouse (*Peromyscus maniculatus*) is also a common resident of oak woodlands. Diurnal raptors, such as the red-tailed hawk (*Buteo jamaicensis*), will forage for small mammals on the project site during the day, and nocturnal raptors, such as the great horned owl (*Bubo virginianus*) will forage for nocturnal rodents at night.

The mature oak trees on the site provide potential roosting habitat for bats in cavities; however, no bats were visually observed or recorded acoustically emerging from these or any other trees on the site during the May 16, 2024 dusk emergence survey, indicating that bats are not roosting in these trees currently, and no maternity roosts are present in these trees.

4.3 Adjacent Habitat Areas

Adobe Creek is an intermittent stream located approximately 16 feet northeast of the project site (Figure 2). This creek supported flowing water at the time of the May 2024 site visit. Riparian woodland habitat along Adobe Creek is dominated by coast live oaks, California buckeyes, coast redwoods, and California bays rooted above and below the tops of banks. The understory of this habitat consists of leaf duff and sparse nonnative annual grasses, with occasional native species such as poison oak. Most of the ground is covered in leaf duff or erosion control materials. The creek is incised with steep banks with grades between 10–20%.

Riparian habitats in California generally support exceptionally rich animal communities and contribute disproportionately to landscape-level species diversity. The presence of seasonal water and abundant invertebrates provide foraging opportunities for many species, and the diverse habitat structure provides cover and nesting opportunities. Leaf litter provides cover for California slender salamanders and Pacific tree frogs, among others. Several reptiles may also occur here, including the western fence lizard, western skink (*Eumeces skiltonianus*), and southern alligator lizard (*Elgaria multicarinata*). Mammals such as the ornate shrew (*Sorex ornatus*), California vole (*Microtus californica*), Audubon's cottontail (*Sylvilagus audubonii*), and San Francisco dusky-footed woodrat provide a prey base for mesopredators that forage here, such as the bobcat and coyote.

In addition to amphibians, reptiles, and mammals, the reach of Adobe Creek adjacent to the project site provides suitable foraging and breeding habitat for many of the bird species listed above, as well as the western flycatcher (*Empidonax difficilis*), Wilson's warbler (*Cardellina pusilla*), warbling vireo (*Vireo gilvus*), and others. Raptors such as red-shouldered hawks (*Buteo lineatus*) and Cooper's hawks nest within riparian corridors and

forage there, as well as in adjacent habitats. Riparian habitats are also used heavily by migrant passerines and wintering birds.

4.4 Wildlife Movement

Wildlife movement within and in the vicinity of the project site takes many forms, and is different for the various suites of species associated with these lands. Bird and bat species move readily over the landscape in the project vicinity, foraging over and within both natural lands and landscaped areas. Mammals of different species move within their home ranges, but also disperse between patches of habitat. Generally, reptiles and amphibians similarly settle within home ranges, sometimes moving to central breeding areas, upland refugia, or hibernacula in a predictable manner, but also dispersing to new areas. Some species, especially among the birds and bats, are migratory, moving into or through the project vicinity during specific seasons. Aside from bats, there are no other mammal species in the vicinity of the site that are truly migratory. However, the young of many mammal species disperse from their natal home ranges, sometimes moving over relatively long distances in search of new areas in which to establish.

Movement corridors are segments of habitat that provide linkage for wildlife through the mosaic of suitable and unsuitable habitat types found within a landscape while also providing cover. On a broader level, corridors also function as paths along which wide-ranging animals can travel, populations can move in response to environmental changes and natural disasters, and genetic interchange can occur. In California, environmental corridors often consist of riparian areas along streams, rivers, or other natural features.

Due to the presence of development surrounding the project site, there are currently no well-defined or important movement corridors for mammals, amphibians, or reptiles on or through the project site. Wildlife species may move through the area using cover and refugia as they find them available. Adobe Creek, which eventually drains to the open waters of the San Francisco Bay, and its associated riparian corridor serves as a movement corridor for several common and special-status species of birds fish, mammals, reptiles, and amphibians through the Los Altos area. In addition, a number of birds, mammals, reptiles, and amphibians utilize the riparian corridor of Adobe Creek for movement purposes, as it provides sufficient vegetative cover preferred by these species when navigating across the landscape. Specifically, migratory passerines, rabbits, striped skunks, raccoons, Pacific treefrogs, and alligator lizards, amongst other species, are expected to move along this corridor adjacent to the project site.

Section 5. Special-Status Species and Sensitive Habitats

CEQA requires assessment of the effects of a project on species that are protected by state, federal, or local governments as “threatened, rare, or endangered”; such species are typically described as “special-status species”. For the purpose of the environmental review of the project, special-status species have been defined as described below. Impacts on these species are regulated by some of the federal, state, and local laws and ordinances described in Section 3 above.

For purposes of this analysis, “special-status” plants are considered plant species that meet one or more of the following criteria:

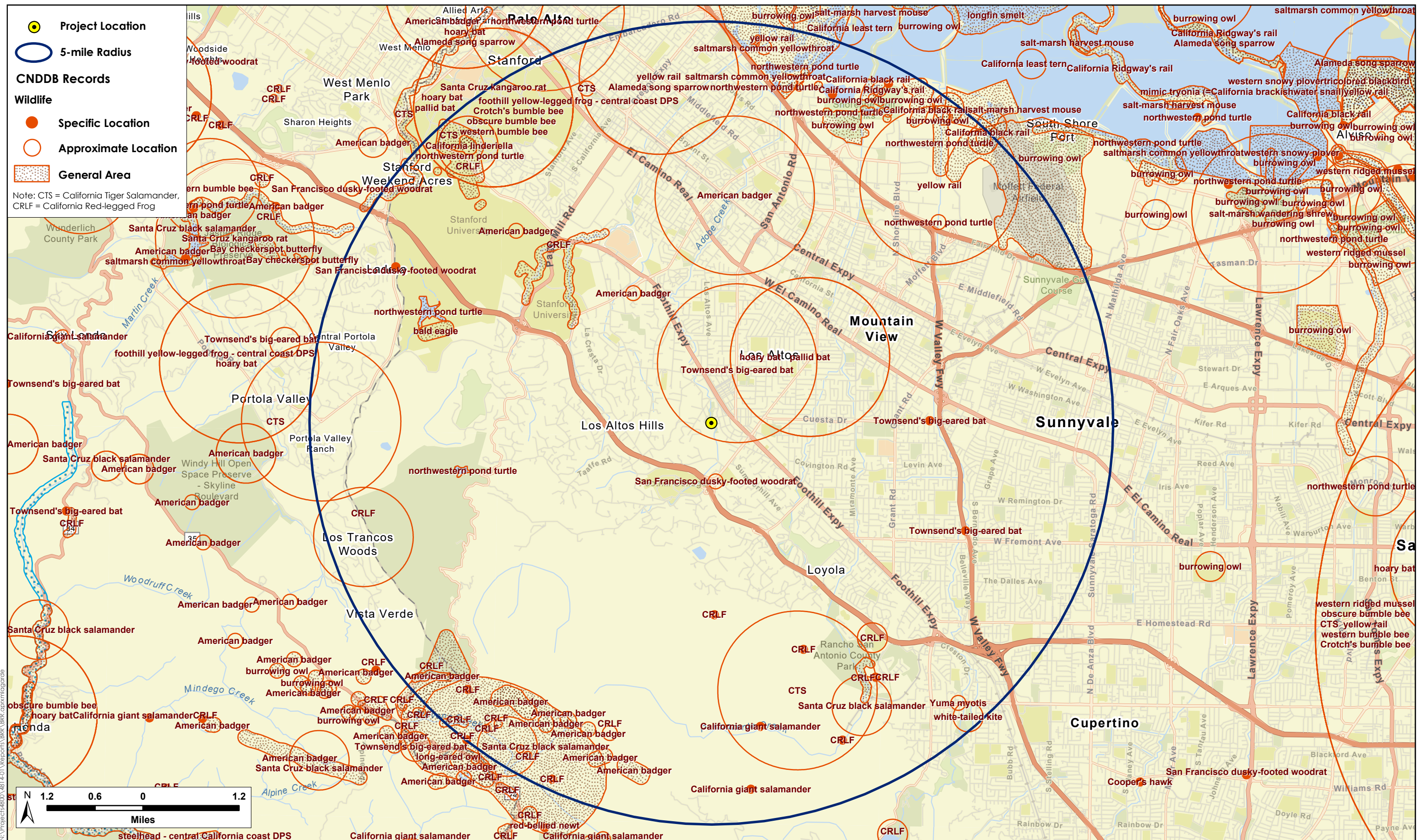
- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under CESA as threatened, endangered, rare, or a candidate species.
- Listed by the CNPS as CRPR 1A, 1B, 2, 3, or 4.

For purposes of this analysis, “special-status” animals are considered animal species that meet one or more of the following criteria:

- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under CESA as threatened, endangered, or a candidate threatened or endangered species.
- Designated by the CDFW as a California species of special concern.
- Listed in the California Fish and Game Code as fully protected species (fully protected birds are provided in Section 3511, mammals in Section 4700, reptiles and amphibians in Section 5050, and fish in Section 5515).

Information concerning threatened, endangered, and other special-status species that potentially occur on the project site was collected from several sources and reviewed by H. T. Harvey & Associates biologists as described in Section 2.1 above. Figure 4 depicts CNDDDB records of special-status plant species in the general vicinity of the project site and Figure 5 depicts CNDDDB records of special-status animal species. These generalized maps show areas where special-status species are known to occur or have occurred historically.





5.1 Special-Status Plant Species

The CNPS (2024) and CNDDB (2024) identify 89 special-status plant species as potentially occurring in at least one of the nine USGS 7.5-minute quadrangles containing or surrounding the project site (for CNPS) or within the project vicinity (for CNDDB) (Appendix B). Of the 89 potentially occurring special-status plant species, 85 were determined to be absent from the project site for at least one of the following reasons: (1) absence of suitable habitat types, (2) lack of specific microhabitat or edaphic requirements, (3) the elevation range of the species is outside of the range of the project site, and/or (4) the project site is outside the species' known geographic range and/or there are no nearby extant records (Appendix B).

Suitable habitat, edaphic requirements, and elevation range are present on the project site for four special-status plant species; these species are addressed in greater detail in Table 1 below. All of the special-status plant species for which suitable habitat is present on the site would have been detectable during a May survey, and hence were determined to be absent from the site during the May 7, 2024 site visit.

Table 1. Special-Status Plant Species, Their Status, and Potential for Occurrence on the Project Site

Name	*Status	Habitat and Blooming Period	Potential for Occurrence on the Project Site
Federal or State Endangered, Threatened, Candidate, or Rare Species			
Dudley's lousewort (<i>Pedicularis dudleyi</i>)	SR, CRPR 1B.2	Maritime chaparral, cismontane woodland, North Coast coniferous forest, and valley and foothill grassland, often in deep shady woods of older coast redwood forests (blooming period April to June)	Absent. Only low-quality suitable cismontane woodland habitat to support this species is present on the project site. Most occurrences are known from more shaded and mesic habitats with less vegetation in the understory. Known to occur at Portola Redwoods State Park approximately 12 miles to the south (CNDDDB 2024). No individuals were observed on the site during a focused survey conducted in May 2024. Determined to be absent.
CNPS-Listed Plant Species			
Bent-flowered fiddleneck (<i>Amsinckia lunaris</i>)	CRPR 1B.2	Coastal bluff scrub, cismontane woodland, valley and foothill grassland/oak woodland and chaparral (blooming period March to June).	Absent. Suitable grassland habitat to support this species is present on the project site. Bent-flowered fiddleneck is known to occur at Foothills Open Space Preserve approximately 3.9 miles to the southwest (CNDDDB 2024). However, no individuals were observed on the site during a focused survey conducted in May 2024. Determined to be absent.
California bottlebrush (<i>Elymus californicus</i>)	CRPR 1B.2	Cismontane woodland, broadleafed upland forest, North Coast coniferous forest, riparian woodland (blooming period May to August)	Absent. Suitable cismontane woodland habitat to support this species is present on the project site. California bottlebrush is known to occur in Sam McDonald County Park approximately 8.8 miles to the southwest (Calflora 2024). However, no individuals were observed on the site during a focused survey conducted in May 2024. Determined to be absent.
Arcuate bush-mallow (<i>Malacothamnus arcuatus</i>)	CRPR 1B.2	Chaparral and cismontane woodland, sometimes on gravelly alluvial soils, or in any shrub or tree woodland that has recently burned (detectable year-round)	Absent. Has been documented in a wide variety of woody habitats, including oak woodland, and is most prevalent after wildland fires (Morse 2022). Known to occur adjacent to Rancho San Antonio County Park and Open Space Preserve approximately 2.3 miles to the south (CNDDDB 2024). However, no individuals were observed on the site during a focused survey conducted in May 2024. Determined to be absent.

*Key to Status Abbreviations: State Rare (SR); California Rare Plant Rank (CRPR).

CRPR 1B = Rare, Threatened, or Endangered in California and elsewhere

.2 = Moderately threatened in California (20-80% of occurrences threatened)

5.2 Special-Status Animal Species

The legal status and likelihood of occurrence on the project site of special-status animal species known to occur, or potentially occurring, in the surrounding region are presented in Table 2. Most of the special-status species listed in Table 2 are not expected to occur on the project site because it lacks suitable habitat, is outside the known range of the species, and/or is isolated from the nearest known extant populations by development or otherwise unsuitable habitat.

The following special-status species that are present in specialized habitats on the San Francisco Peninsula, or that occurred on or near the Peninsula historically but are no longer present, are absent from the project site due to a lack of suitable habitat and/or isolation of the site from populations by urbanization: the western bumble bee (*Bombus occidentalis*), Crotch's bumble bee (*Bombus crotchii*), Bay checkerspot butterfly (*Euphydryas editha bayensis*), California tiger salamander (*Ambystoma californiense*), Santa Cruz black salamander (*Aneides niger*), California red-legged frog (*Rana draytonii*), foothill yellow-legged frog (*Rana boylei*), San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), northwestern pond turtle (*Actinemys marmorata*), northern harrier (*Circus hudsonius*), burrowing owl (*Athene cunicularia*), grasshopper sparrow (*Ammodramus savannarum*), tricolored blackbird (*Agelaius tricolor*), loggerhead shrike (*Lanius ludovicianus*), and American badger (*Taxidea taxus*). While bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*) may fly over the project site at times, none are expected to nest or forage on or close to the project site.

No aquatic habitats to support special-status fish species are present on the project site. Adobe Creek, located 16 feet to the north, potentially supports southern coastal roach (*Hesperoleucus venustus subditus*) and riffle sculpin (*Cottus gulosus*), which are California species of special concern. The Sacramento hitch (*Lavinia exilicauda exilicauda*), also a species of special concern, is not known to occur in the Adobe Creek watershed. Anadromous special-status fish species, including the Central California Coast steelhead (*Oncorhynchus mykiss*), Central California Coast coho salmon (*Oncorhynchus kisutch*), and Pacific lamprey (*Entosphenus tridentatus*), are absent from Adobe Creek due to the tide gates at the mouth of Adobe Creek and the box culverts at the road crossings of El Camino Real and Interstate 280 downstream of the site, which are impassible barriers (Leidy et al. 2005).

The mountain lion (*Puma concolor*), a candidate for listing under CESA; the monarch butterfly (*Danaus plexippus*), a candidate for listing under FESA; and the western red bat (*Lasiurus blossevillei*) and pallid bat (*Antrozous pallidus*), which are California species of special concern, may also forage on the project site. As discussed in Table 2, these species are not expected to den, roost, or breed on or immediately adjacent to the project site due to a lack of suitable habitat, and they will be affected very little, if at all, by the proposed project. In addition, the olive-sided flycatcher (*Contopus cooperi*) is considered a California species of special concern only when nesting; individuals may occasionally occur on or over the project site as nonbreeding transients, foragers, or migrants, but no suitable nesting habitat for this species occurs on the project site.

The California giant salamander (*Dicamptodon ensatus*), Vaux's swift (*Chaetura vauxi*), yellow warbler (*Setophaga petechia*), white-tailed kite (*Elanus leucurus*), San Francisco dusky-footed woodrat, and Townsend's big-eared bat are addressed in greater detail in this report because these species can potentially breed or occur on or immediately adjacent to the project site and/or may be significantly impacted by the proposed project in the absence of avoidance and minimization measures (see Section 6 *Impacts and Mitigation Measures* below).

Table 2. Special-Status Animal Species, Their Status, and Potential for Occurrence on the Project Site

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Federal or State Endangered, Threatened, or Candidate Species			
Bay checkerspot butterfly (<i>Euphydryas editha bayensis</i>)	FT	Native grasslands on serpentine soils. Larval host plants are <i>Plantago erecta</i> and/or <i>Castilleja</i> sp. The flight season extends from late February to early May.	Absent. No suitable habitat; determined to be absent.
Monarch butterfly (<i>Danaus plexippus</i>)	FC	Requires milkweeds (<i>Asclepias</i> spp.) for egg-laying and larval development, but adults obtain nectar from a wide variety of flowering plants in many habitats. Individuals congregate in winter roosts, primarily in Mexico and in widely scattered locations on the central and southern California coast.	May be Present as Nonbreeder. The monarch butterfly occurs throughout the region primarily as a migrant. No milkweeds were observed on the project site during the May 2024 survey, and therefore no breeding habitat is present on the site. Small numbers of individuals may forage on the project site, especially during spring and fall migration. However, the site does not provide high-quality foraging habitat for this species. While ostensibly suitable overwintering habitat for monarchs (i.e., eucalyptus [<i>Eucalyptus</i> sp.] trees) is present within areas of the Redwood Grove Nature Preserve adjacent to the site, no current or historical overwintering sites are known as far inland as the project site; the nearest known overwintering aggregation location is 18.6 miles to the northwest in Coyote Point Recreation Area in San Mateo (Xerces Society 2024).
Crotch's bumble bee (<i>Bombus crotchii</i>)	SC	Open grassland and scrub habitats.	Absent. Although this species was historically found throughout the southern two-thirds of California, population declines and range contractions (25% relative to its historical range) have made this species very scarce in the region (CDFW 2019). Since 2019, there have been documented occurrences of approximately 100 individuals from nearly 20 locations in Santa Clara County (Bumble Bee Watch 2024; iNaturalist 2024; S. Rottenborn, pers. obs.), indicating that the species is still extant, and fairly widespread (albeit in low numbers in most locations) in the county. However, no suitable grassland or scrub habitat to provide nesting and foraging habitat for this species is present on or adjacent to the site, and no high-quality floral resources to attract this species to the site are present. Therefore, this species is determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Western bumble bee (<i>Bombus occidentalis</i>)	SC	Occurs in a variety of grassland, scrub, and open woodland habitats.	Absent. Although the species was historically found throughout much of central and northern California, including the project vicinity, it has been extirpated from much of its former range, and there are no recent records from Los Altos or nearby areas (CDFW 2019, Bumble Bee Watch 2024, iNaturalist 2024). Therefore, this species is absent from the project site.
Central California coast steelhead (<i>Oncorhynchus mykiss</i>)	FT	Cool streams with suitable spawning habitat and conditions allowing migration between spawning and marine habitats.	Absent. Occurs in the open waters of the San Francisco Bay, and is known to have occurred historically in Adobe Creek. However, the tide gates at the mouth of Adobe Creek can preclude the passage of anadromous fish, and the box culverts at the road crossings of El Camino Real and Interstate 280 downstream of the site are impassible barriers (Leidy et al. 2005). Determined to be absent.
Central California Coast coho salmon (<i>Oncorhynchus kisutch</i>)	FT, ST	Open ocean, estuaries, and rivers	Absent. Central California Coast coho salmon may have occurred historically in the San Francisco Creek watershed, but they have not been observed in San Francisco Estuary streams since the early- to mid-1980's (Leidy 2007). In addition, the tide gates at the mouth of Adobe Creek can preclude the passage of anadromous fish, and the box culverts at the road crossings of El Camino Real and Interstate 280 downstream of the site are impassible barriers (Leidy et al. 2005). Thus, this species is absent from Adobe Creek adjacent to the project site.
California tiger salamander (<i>Ambystoma californiense</i>)	FT, ST	Vernal or temporary pools in annual grasslands or open woodlands. Adults live terrestrially in small mammal burrows.	Absent. The California tiger salamander's range on the San Francisco Peninsula historically occurred as far northwest as Woodside (CNDDDB 2024). The closest extant population is located in the vicinity of Lake Lagunita on the Stanford University Campus, approximately 3.9 miles to the northwest (CNDDDB 2024). Two additional historical occurrences are located 2.5 miles to the south (from 1893) and 3.9 miles to the west (from 1940), on the far side of Interstate 280 (CNDDDB 2024). All of these occurrences are located far beyond the known dispersal distance of the species from the project site, and are separated from the project site by extensive urbanization and busy roadways. Therefore, this species is determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
California red-legged frog (<i>Rana draytonii</i>)	FT, CSSC	Streams, freshwater pools, and ponds with emergent or overhanging vegetation.	Absent. No suitable aquatic breeding habitat for California red-legged frogs is present on the project site, and the nearby Adobe Creek is too fast-flowing and shallow, and lacks suitable pools and submergent vegetation, to provide suitable breeding habitat for this species. Known to occur along Purisima Creek 2.0 miles to the north and at Rancho San Antonio County Park 3.5 miles to the south (CNDDDB 2024). However, dense urbanization and busy roadways present in between these records and the project site represent barriers to dispersal that prevent individuals at these locations from reaching the project site. Thus, this species is determined to be absent.
Foothill yellow-legged frog (<i>Rana boylei</i>)	FT, SE	Streams, freshwater pools, and ponds with emergent or overhanging vegetation.	Absent. No suitable aquatic habitat is present on the project site, and the nearby Adobe Creek is too incised with limited cover to support habitat for this species. Historic records of this species are present in the Stanford and Portola Valley areas, but these records are considered to be extirpated (CNDDDB 2024). The closest population of this species is located more than 9 miles to the southwest in the Santa Cruz Mountains (CNDDDB 2024). Due to the intervening distance between current populations of this species and the project site, this species is determined to be absent.
San Francisco garter snake (<i>Thamnophis sirtalis tetrataenia</i>)	FE, SE, SP	Occurs in a variety of habitats, including riparian areas; requires burrows for hibernation and frogs as a prey base.	Absent. The San Francisco garter snake occurs on the San Francisco Peninsula from just north of the San Francisco–San Mateo County line south to approximately the San Mateo–Santa Cruz County line. An intergrade zone composed of hybrids between the San Francisco garter snake and red-sided garter snake (<i>Thamnophis sirtalis sirtalis</i>) occurs from Palo Alto north to the Pulgas region near Upper Crystal Springs Reservoir (Barry 1994). Thus, the project site is outside the range of the species, and determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Northwestern pond turtle (<i>Actinemys marmorata</i>)	FPT, CSSC	Permanent or nearly permanent water in a variety of habitats with abundant emergent or riparian vegetation. Females lay eggs in upland habitats, in clay or silty soils in unshaded (often south-facing) areas (Jennings and Hayes 1994).	Absent. Known to occur in the project vicinity west of Interstate 280 approximately 3.1 miles to the southwest at Boranda Lake and 3.5 miles to the west at Felt Lake (CNDDDB 2024). Ostensibly suitable aquatic dispersal and foraging habitat is present in Adobe Creek adjacent to the project site. However, Adobe Creek lacks connectivity to known occurrences of the species, and the lack of deep pools with aquatic escape cover make the habitat unsuitable for regular use by pond turtles. Further, because the closest occurrences of the species are separated from the project site by urban development and Interstate 280, individuals are not expected to successfully disperse across these developed areas to reach the project site. Determined to be absent.
Bald eagle (<i>Haliaeetus leucocephalus</i>)	SE, SP	Occurs mainly along seacoasts, rivers, and lakes; nests in tall trees or in cliffs, occasionally on electrical towers; feeds mostly on fish and waterfowl	Absent. No rivers or lakes are present on or near the project site to provide foraging habitat for this species, and individuals are not expected to nest on the site due to the lack of foraging habitat nearby. Determined to be absent.
Tricolored blackbird (<i>Agelaius tricolor</i>)	ST	Nests near fresh water in dense emergent vegetation.	Absent. The tricolored blackbird has bred in only a few scattered locations in the project vicinity, and is absent from, or occurs only as a nonbreeder in, the surrounding area (Sequoia Audubon Society 2001, Rottenborn 2007a). This species typically nests in extensive stands of tall emergent herbaceous vegetation in non-tidal freshwater marshes and ponds. No suitable nesting habitat is present on the project site or along Adobe Creek adjacent to the site, as no large patches of emergent vegetation, blackberry (<i>Rubus</i> sp.) stands, or other suitable vegetation are present. Further, this species (whose colonies are loud and conspicuous) has never been recorded nesting in the site vicinity (Sequoia Audubon Society 2001, Rottenborn 2007a, Cornell Lab of Ornithology 2024), and high levels of disturbance likely preclude nesting near the site. The site also does not provide suitable foraging habitat for this species.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Mountain lion (Southern California/Central Coast ESU) (<i>Puma concolor</i>)	SC	Has a large home range size and occurs in a variety of habitats. Natal dens are typically located in remote, rugged terrain far from human activity. May occasionally occur in areas near human development, especially during dispersal.	May be Present as Nonbreeder. In the project region, there are verified sightings reported on BAPP.org (2024) and numerous unpublished reports. This species occurs widely, though at low densities, throughout the Santa Cruz Mountains, and may disperse into lowland/valley floor areas. Mountain lions are not expected to regularly use the project site or establish a den on the site due to high levels of human activity and a lack of suitable denning habitat, but individuals may occur on the site as rare dispersants due to the site's location near the periphery of development in the Los Altos Hills area (i.e., only approximately 1 mile from open lands south of Interstate 280).
California Species of Special Concern			
Pacific lamprey (<i>Entosphenus tridentatus</i>)	CSSC	Occupies anadromous habitat in large streams entering the San Francisco and San Pablo Bays. Spawns in cool (shaded), clear, slow-moving rivers and streams supporting gravel, silt, and sand substrates (Moyle et al. 2015).	Absent. Historically, this species may have been present in streams throughout Santa Clara County. However, the tide gates at the mouth of Adobe Creek can preclude the passage of anadromous fish, and the box culverts at the road crossings of El Camino Real and Interstate 280 downstream of the site are impassible barriers (Leidy et al. 2005). Determined to be absent.
Southern coastal roach (<i>Hesperoleucus venustus subditus</i>)	CSSC	Occur in a wide array of habitats and are tolerant of intermittent surface water, a range of temperatures, and low dissolved oxygen. Spawn in shallow habitats with flow and coarse substrates.	Absent (May be Present in Adjacent Waters). No suitable aquatic habitat is present on the project site. However, this species is known to occur in Adobe Creek (Leidy 2007), and may be present in the adjacent reach of Adobe Creek during months when water is present.
Sacramento hitch (<i>Lavinia exilicauda exilicauda</i>)	CSSC	Warm, lowland, waters including clear streams, turbid sloughs, lakes, and reservoirs. Has a high tolerance for varying stream conditions and water temperature.	Absent. Not known to occur within the Adobe Creek watershed (Leidy 2007). Determined to be absent.
Riffle sculpin (<i>Cottus gulosus</i>)	CSSC	Permanent, cool, headwater streams with an abundance of riffles and rocky substrates.	Absent (May be Present in Adjacent Waters). Riffle sculpin are widespread and locally abundant in the region, and are native to the Adobe Creek watershed (Leidy 2007). No suitable aquatic habitat to support this species is present on the project site. However, individuals may be present in the adjacent reach of Adobe Creek when it contains water.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
California giant salamander (<i>Dicamptodon ensatus</i>)	CSSC	Adults found in wet forests under rocks and logs near streams. Uses cold, clear streams for breeding.	May be Present as Nonbreeder. California giant salamanders are known to occur in the project vicinity in the residential hills surrounding the project site as close as 0.6 mile to the northwest, and along Permanente Creek 3.8 miles to the southwest (CNDDDB 2024). Suitable aquatic habitat is present in Adobe Creek during period when it contains water, and vegetative debris in the riparian woodland along the creek provides upland refugial habitat. Aquatic breeding habitat and riparian nonbreeding habitat to support this species are absent from the project site. However, small numbers of individuals from nearby locations along Adobe Creek or in the surrounding residential hills may disperse across the site on occasion.
Santa Cruz black salamander (<i>Aneides niger</i>)	CSSC	Mixed deciduous and coniferous woodlands and coastal grasslands. Adults found under rocks, talus, and moist woody debris.	Absent. Occurs in the Santa Cruz Mountains and foothills southeast of Interstate 280 (CNDDDB 2024, iNaturalist 2024). However, no records are known from valley floor areas in the project vicinity northeast of Interstate 280 (CNDDDB 2024, iNaturalist 2024). Determined to be absent.
Northern harrier (<i>Circus cyaneus</i>)	CSSC (nesting)	Nests in marshes and moist fields, forages over open areas.	Absent. No suitable nesting or foraging habitat is present on the project site or in the surrounding vicinity, which is developed as a residential area. Determined to be absent.
Burrowing owl (<i>Athene cunicularia</i>)	CSSC	Nests and roosts in open grasslands and ruderal habitats with suitable burrows, usually those made by California ground squirrels (<i>Otospermophilus beecheyi</i>).	Absent. No burrows of California ground squirrels are present on the project site to provide suitable nesting and roosting habitat for this species, and no suitable grasslands are present to provide foraging habitat. Not known to occur on the site, and the nearest occurrences are located several miles away along the periphery of the San Francisco Bay to the north and at Pearson-Arastradero Preserve to the west (Cornell Lab of Ornithology 2024). Determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Vaux's swift (<i>Chaetura vauxi</i>)	CSSC (nesting)	Nest both in small colonies and as single pairs, occupying cavities in large snags, primarily in old-growth forests. They also occasionally use artificial cavities such as chimneys. Forage aerially.	May be Present. Known to nest in northwestern Santa Clara County (Rottenborn 2007b) and in eastern San Mateo County (Sequoia Audubon Society 2001) near the project location. The residential chimney in the Halsey House building on the site provides suitable nesting habitat for this species, and cavities large snags in surrounding areas at Redwood Grove Nature Preserve also provide suitable habitat. However, no Vaux's swifts were observed on the site during the May 2024 site visit, indicating this species is not nesting on or adjacent to the site currently. Nonbreeding individuals may forage aerially over the project site, especially during migration.
Olive-sided flycatcher (<i>Contopus cooperi</i>)	CSSC (nesting)	Breeds in mature, primarily coniferous, forests with open canopies, along forest edges in more densely vegetated areas, in recently burned forest habitats, and in selectively harvested landscapes.	May be Present as Nonbreeder. Known to nest throughout much of San Mateo County and in northwestern Santa Clara County, including in the project vicinity (Sequoia Audubon 2001, Bousman 2007a). However, no suitable coniferous forest nesting habitat is present on or adjacent to the project site. Occasional nonbreeding individuals may forage on the site, especially during migration.
Loggerhead shrike (<i>Lanius ludovicianus</i>)	CSSC (nesting)	Nests in tall shrubs and dense trees; forages in grasslands, marshes, and ruderal habitats.	Absent. Known to nest in eastern San Mateo County (Sequoia Audubon Society 2001) and in northwestern Santa Clara County (Bousman 2007b). However, no grasslands are present on the site to provide suitable nesting and foraging habitat. Determined to be absent.
Yellow warbler (<i>Setophaga petechia</i>)	CSSC (nesting)	Nests in riparian woodlands.	May be Present as Nonbreeder (May be Present in Adjacent Areas). No suitable riparian nesting habitat is present on the project site. Potentially suitable riparian nesting habitat is present along Adobe Creek adjacent to the site; however, this species is an uncommon breeder in the region, and is not known to nest near the site (Cornell Lab of Ornithology 2024). Thus, the likelihood that this species would nest along Adobe Creek adjacent to the site is relatively low. The yellow warbler is an abundant migrant throughout the project region during the spring and fall, when nonbreeding individuals may forage in woodland habitat on the site.
Grasshopper sparrow (<i>Ammodramus savannarum</i>)	CSSC (nesting)	Nests and forages in grasslands, meadows, fallow fields, and pastures.	Absent. Known to nest and occur in the project region primarily in grasslands, such as at the Pearson-Arastradero Preserve approximately 3.1 miles to the west (Cornell Lab of Ornithology 2024). No suitable nesting or foraging habitat for this species is present on the project site due to the lack the grassland habitat and the presence of trees. Determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Pallid bat (<i>Antrozous pallidus</i>)	CSSC	Forages over many habitats; roosts in caves, rock outcrops, buildings, and hollow trees.	May be Present as Nonbreeder. Historically, pallid bats were likely present in a number of locations throughout the project region, but their populations have declined in recent decades. However, no known recent (after 1960) records of maternity colonies of this species are present on or adjacent to the project site (CNDDDB 2024, iNaturalist 2024). Suitable roosting habitat for pallid bats is present in the Halsey House building, as well as in cavities in the large coast live oak tree on the project site. However, no pallid bats were detected during focused bat surveys in May 2024, and thus the species is not currently roosting on the site. Individuals from colonies in the region (especially in the Santa Cruz Mountains to the west) could occasionally forage on the project site.
Townsend's big-eared bat (<i>Corynorhinus townsendii</i>)	CSSC	Roosts in caves and mine tunnels, and occasionally in deep crevices in trees such as redwoods or in abandoned buildings, in a variety of habitats.	Present as Nonbreeder. An individual Townsend's big-eared bat was observed roosting in the Halsey House building during the May 2024 site visit, and calls of this species were detected within and outside of the building during the acoustic survey. Based on the relatively small number of calls detected, as well as their timing, we determined in consultation with H. T. Harvey & Associates senior bat biologist David Johnston, Ph.D., that the Townsend's big-eared bats using the building represent a non-maternity roost of a small number of individuals, likely consisting of one or few individual male bats, which is typical of this species.
Western red bat (<i>Lasiurus blossevillei</i>)	CSSC	Roosts in foliage in forest or woodlands, especially in or near riparian habitat.	Low Potential for Occurrence. Western red bats occur in the project vicinity in low numbers as migrants and winter residents, but this species does not breed in the region. Individual western red bats may roost in the foliage of trees virtually anywhere on the project site, but are expected to roost primarily in riparian areas, such as along Adobe Creek to the north. Occasional individuals may forage over the project site year-round.
San Francisco dusky-footed woodrat (<i>Neotoma fuscipes annectens</i>)	CSSC	Nests in a variety of habitats including riparian areas, oak woodlands, and scrub.	Present. Four active woodrat nests were detected on the ground in understory vegetation in coast live oak woodland habitat on the site during the focused survey in May 2024. Suitable habitat for this species is present throughout the coast live oak woodland habitat on the project site.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
American badger (<i>Taxidea taxus</i>)	CSSC	Burrows in grasslands and occasionally in infrequently disked agricultural areas.	Absent. Primarily occurs in extensive grasslands and scrub habitats. This species is known to occur in the project region in the Santa Cruz Mountains to the west (CNDDDB 2024, iNaturalist 2024). Occasional dispersants occur in the project vicinity, and an individual was detected 1.9 miles to the northwest near Foothill Expressway and Arastradero Road in 2019 (iNaturalist 2024). However, badgers are not expected to occur on the project site or establish a den there due to the lack of extensive grasslands present as well as the approximately 5-mile distance between the site and known populations in the Santa Cruz Mountains to the west. Determined to be absent.
State Fully Protected Species			
Golden eagle (<i>Aquila chrysaetos</i>)	SP	Breeds on cliffs or in large trees (rarely on electrical towers); forages in open areas.	Absent. The habitat on the site and within the surrounding Preserve is not sufficiently large to support a nesting pair of golden eagles, and the species would not forage on the site or in the Preserve due to the limited extent of habitat present and its isolation from more extensive habitats in the region, such as in the Santa Cruz Mountains, in the Stanford Dish area, and along the San Francisco Bay. Determined to be absent.
White-tailed kite (<i>Elanus leucurus</i>)	SP	Nests in tall shrubs and trees; forages in grasslands, marshes, and ruderal habitats.	May be Present. White-tailed kites are common residents in open areas in the project vicinity. Trees in the coast live oak woodland habitat on the project site provide suitable nesting habitat for this species. No white-tailed kites or nests of this species were observed on or adjacent to the site during the May 2024 site visit, and the species is not known to occur on the site (Cornell Lab of Ornithology 2024). However, occasional individuals will nest and forage in parks in urban areas, and up to one pair of white-tailed kites may nest in trees on or adjacent to the project site. Individuals of this species may forage on the site year-round.

Key to Abbreviations: Status: Federally Endangered (FE); Federally Threatened (FT); Federal Candidate for Listing (FC); Federally Proposed as Threatened (FPT); State Endangered (SE); State Threatened (ST); State Candidate for Listing (SC); State Fully Protected (SP); California Species of Special Concern (CSSC).

5.3 Sensitive Natural Communities, Vegetation Alliances, and Habitats

Natural communities have been considered part of the Natural Heritage Conservation triad, along with plants and animals of conservation significance, since the state inception of the Natural Heritage Program in 1979. The CDFW determines the level of rarity and imperilment of vegetation types, and tracks sensitive communities in its Rarefind database (CNDDDB 2024). Global rankings (G) of natural communities reflect the overall condition (rarity and endangerment) of a habitat throughout its range, whereas state (S) rankings are a reflection of the condition of a habitat within California. Natural communities are defined using NatureServe's standard heritage program methodology as follows (Faber-Langendoen et al. 2012):

G1/S1:	Critically imperiled
G2/S2:	Imperiled
G3/S3:	Vulnerable.
G4/S4:	Apparently secure
G5/S4:	Secure

In addition to tracking sensitive natural communities, the CDFW also ranks vegetation alliances, defined by repeating patterns of plants across a landscape that reflect climate, soil, water, disturbance, and other environmental factors (Sawyer et al. 2009). If an alliance is marked G1-G3, all of the vegetation associations within it will also be of high priority (CDFW 2024). The CDFW provides VegCAMP's currently accepted list of vegetation alliances and associations (CDFW 2024).

Impacts on CDFW sensitive natural communities, vegetation alliances/associations, or any such community identified in local or regional plans, policies, and regulations, must be considered and evaluated under CEQA (Title 14, Division 6, Chapter 3, Appendix G of the California Code of Regulations). Furthermore, aquatic, wetland and riparian habitats are also protected under applicable federal, state, or local regulations, and are generally subject to regulation, protection, or consideration by the USACE, RWQCB, CDFW, and/or the USFWS.

5.3.1 Sensitive Natural Communities

A query of sensitive natural communities in the CNDDDB (2024) identified four sensitive natural communities as occurring within the nine 7.5-minute USGS quadrangles containing or surrounding the project site: northern coastal salt marsh (Rank G3/S3.2), northern interior cypress forest (Rank G1/S1.2), serpentine bunchgrass (Rank G2/S2.2), and valley oak woodland (G3/S2.1). The coast live oak woodland on the project site does not meet the definition of valley oak woodland natural community type due to the lack of dominance of valley oaks within the overstory. No sensitive natural communities are present on the project site.

5.3.2 Sensitive Vegetation Alliances

None of the habitat types on the site represent or include sensitive vegetation alliances.

5.3.3 CDFW Riparian Habitat

Due to its rarity and disproportionately high habitat values and functions to wildlife, the CDFW considers riparian habitat to be sensitive. As described above in Section 3.2.4, the CDFW would likely claim jurisdiction over areas at, and below, the top of bank lines on either side of Adobe Creek adjacent to the project site, as well as its associated riparian habitat, located approximately 16 feet off-site to the north. However, riparian habitat associated with Adobe Creek does not extend onto the project site, and it would not be directly or indirectly impacted by project activities.

5.3.4 Sensitive Habitats (Waters of the U.S./State)

No wetlands or other waters of the U.S./state occur on the project site. Adobe Creek located approximately 16 feet off-site to the north would likely be considered jurisdictional waters of the U.S. up to the OHW mark, and the RWQCB may claim the banks of Adobe Creek, and riparian habitat rooted below top of bank, as waters of the state. However, these potentially jurisdictional areas are located entirely off-site.

5.3.5 Nonnative and Invasive Species

Several nonnative, invasive plant species occur on the project site. Of these, several have a “limited” rating by the Cal-IPC, indicating they are invasive but their ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Their reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited, but these species may be locally persistent and problematic. These “limited” species on the project site are pepper tree, variable burclover (*Medicago polymorpha*), curly dock, and soft chess (*Bromus hordeaceus*). Species with a “moderate” rating by the Cal-IPC have substantial and apparent—but generally not severe—ecological impacts on physical processes, plant and animal communities, and vegetation structure, and that their reproductive biology and other attributes are conducive to moderate-to-high rates of dispersal, though establishment would be generally dependent on ecological disturbance are: tall sock-destroyer (*Torilis arvensis*), greater periwinkle (*Vinca major*), Italian thistle, rose clover, tree of heaven, ripgut brome, and foxtail barley. Species with a “high” invasive rating by the Cal-IPC have the potential to cause severe ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate-to-high rates of dispersal and establishment, and most are widely distributed ecologically (Cal-IPC 2024). On the project site, species with a “high” rating are English ivy and French broom. Due to these species’ ubiquity in the region, project activities are not expected to result in the spread of nonnative and invasive plant species.

Section 6. Impacts and Mitigation Measures

CEQA and the State CEQA Guidelines provide guidance in evaluating impacts of projects on biological resources and determining which impacts will be significant. The Act defines “significant effect on the environment” as “a substantial adverse change in the physical conditions which exist in the area affected by the proposed project.”

Appendix G of State CEQA Guidelines provides a checklist of other potential impacts to consider when analyzing the significance of project effects. The impacts listed in Appendix G (Chapter IV) may or may not be significant, depending on the level of the impact. For biological resources, these impacts include whether the project would:

- A. “have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service”
- B. “have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service”
- C. “Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means”
- D. “interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites”
- E. “conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance”
- F. “conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan”

Potential impacts on biological resources as a result of the proposed project were systematically evaluated at the project level based on the project description provided to us by David J. Powers & Associates through July 2024. Based on this information, it is our understanding that all project impacts including grading, construction, and staging will occur within the limits of boundaries provided, and that all project impacts within this boundary will be permanent. For the purpose of this assessment, we have assumed that the proposed project would impact up to all 0.6 acre of the project site.

Potential impacts on existing biological resources were evaluated by comparing the quantity and quality of habitats present on the project site under baseline conditions to the anticipated conditions after implementation of the proposed project. Direct and indirect impacts on special-status species and sensitive natural communities were assessed based on the potential for the species, their habitat, or the natural community in question to be disturbed or enhanced following implementation of the proposed project.

6.1 Impacts on Special-Status Species: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS (Less than Significant with Mitigation)

6.1.1 Impacts on Regionally Common Habitats and Associated Common Plant and Wildlife Species (Less than Significant)

Proposed project activities would result in the permanent removal of up to 0.3 acre of developed areas and 0.3 acre of coast live oak woodland on the project site. These impacts would reduce the extent of vegetation within the impact area and result in a reduction in the abundance of some of the common plant and wildlife species that occur there. However, the developed and coast live oak woodland habitats on the project site occur in a location in Los Altos that has been subject to disturbance in the past, is regularly disturbed by human activities, and are surrounded by developed residential areas such that these habitats do not provide regionally rare or especially high-value habitat for native vegetation, wildlife, or special-status species. In addition, these habitats are abundant and widespread regionally, are not particularly sensitive, and are not especially valuable (from the perspective of providing important plant or wildlife habitat) or exemplary occurrences of these habitat types. Also, following demolition of the building and removal of building materials, the site will remain vegetated with ruderal herbaceous vegetation, which will still have some habitat value. Therefore, impacts on these habitats are considered less than significant under CEQA. Further, because the number of individuals of any common plant or animal species within these habitats, and the proportion of these species' regional populations that could be disturbed, is very small, the project's impacts would not substantially reduce regional populations of these species. Thus, these impacts do not meet the CEQA standard of having a *substantial* adverse effect, and would not be considered significant under CEQA.

6.1.2 Impacts on Water Quality and Special-Status Fish (Less than Significant)

No direct impacts to Adobe Creek, which flows southwest to northeast approximately 16 feet from the project site, are proposed. Indirect impacts on water quality in the creek could potentially occur as a result of project activities, which are located upslope of the creek. Project activities could potentially impact the southern coastal roach and riffle sculpin in Adobe Creek due to a temporary increase in erosion, sedimentation, and turbidity in aquatic habitats located downstream of the work area. Additionally, minor spills of petrochemicals, hydraulic fluids, and solvents may occur during vehicle and equipment refueling. Such leaks/spills could adversely affect water quality downslope and downstream of construction activities.

Indirect impacts on water quality from construction of the project would be avoided and minimized by implementing erosion and sediment control measures, as well as BMPs for work near aquatic environments. In addition, in many Bay Area counties, including Santa Clara County, projects must also comply with the California RWQCB, San Francisco Bay Region, Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit (Water Board Order No. R2-2015-0049). This permit requires that all projects implement BMPs and incorporate Low Impact Development practices into the design to prevent stormwater runoff pollution, promote infiltration, and hold/slow down the volume of water coming from a site after construction has been completed. In order to meet these permit and policy requirements, projects must incorporate the use of green roofs, impervious surfaces, tree planters, grassy swales, bioretention and/or detention basins, among other factors.

Compliance with these permit requirements will minimize the potential for impacts on water quality due to increases in erosion, sedimentation, and turbidity as well as releases of pollutants into Adobe Creek located downslope of the project site. Therefore, project activities are not expected to result in substantial adverse indirect effects on water quality or special-status fish, and such impacts would be less than significant.

6.1.3 Impacts on Nonbreeding Special-Status Invertebrates, Birds, and Mammals (Less than Significant)

Several special-status bird and mammal species may occur on the project site as nonbreeding migrants, transients, or foragers, but they are not known or expected to breed or occur in large numbers within or near the project impact area. These are the monarch butterfly, olive-sided flycatcher, mountain lion, and western red bat.

Few, if any, monarch butterflies are expected to be present on the project site given the small size of the site, the lack of milkweeds on the site, the lack of high-quality floral resources to support foraging individuals, and the lack of any evidence that an overwintering site is present. The olive-sided flycatcher (a California species of special concern) is not expected to occur on or close to the project site as a breeder due to the lack of suitable habitat, but individuals may occur occasionally as foragers during the nonbreeding season. Due to the site's location in a low-density residential area on the periphery of open space areas of the Santa Cruz Mountains, individual mountain lions (a state candidate species) may briefly traverse the site as non-breeding dispersants or foragers, but individuals are not expected to linger for any length of time due to high levels of human activity. The western red bat (a California species of special concern) may roost in small numbers in trees on the project site, but it does not breed in the project region.

Activities under the proposed project would have some potential to impact foraging habitats and/or disturb small numbers of individuals of these species. Construction activities might result in a temporary direct impact through the alteration of foraging patterns (e.g., avoidance of work sites because of increased noise and activity levels during maintenance activities) but would not result in the loss of individuals, as individuals of these species would move away from any construction areas or equipment before they could be injured or killed. Further, the project site does not provide important foraging habitat used regularly or by large numbers of

individuals of any of these species. As a result, impacts of the project will have little impact on these species' foraging habitat and no substantive impact on regional populations of these species. Therefore, this impact would be less than significant under CEQA.

6.1.4 Impacts on the White-Tailed Kite, Vaux's Swift, and Yellow Warbler (Less than Significant)

The white-tailed kite (a state fully protected species) may nest in oak woodland habitat or landscape trees on and adjacent to the project site, the Vaux's swift (a California species of special concern) may nest in the Halsey House chimney or in hollow snags in surrounding areas, and the yellow warbler (a California species of special concern) could potentially nest adjacent to the project site in riparian trees along Adobe Creek. These species are assessed together because the potential impacts of the project on these species would be similar.

Based on site observations, the areal extent of suitable habitats on and adjacent to the project site, and known nesting densities of this species, no more than one pair of white-tailed kites or yellow warblers, or two pairs of Vaux's swifts, could potentially nest on or immediately adjacent to the project site. The project would not result in the permanent loss of suitable nesting habitat for the yellow warbler, as no activities are proposed within the riparian habitat along Adobe Creek. The project would result in the permanent loss of suitable nesting and foraging habitat for the white-tailed kite and Vaux's swift, as well as suitable foraging habitat for the yellow warbler. In addition, activities that occur during the nesting season and cause a substantial increase in noise or human activity near active nests may result in the abandonment of active nests (i.e., nests with eggs or young). Heavy ground disturbance, noise, and vibrations caused by project activities could potentially disturb nesting and foraging individuals and cause them to move away from work areas.

Because the number of nesting pairs that could be disturbed is very small (i.e., one or two pairs), the impacts of project activities would represent a very small fraction of the regional populations of these species. Therefore, neither the potential loss of individual white-tailed kites, Vaux's swifts, or yellow warblers, nor the disturbance of nesting and foraging habitat, would rise to the CEQA standard of having a *substantial* adverse effect, and these impacts would thus not constitute a significant impact on these species or their habitat under CEQA. However, as discussed in Section 3 above, all native migratory birds, including yellow warblers and white-tailed kites, are protected under the MBTA and California Fish and Game Code. Recommended measures to comply with these laws are provided under Section 7 *Compliance with Additional Laws and Regulations*, below.

6.1.5 Impacts on the San Francisco Dusky-Footed Woodrat (Less than Significant with Mitigation)

Four nests of San Francisco dusky-footed woodrats are present in coast live oak woodland habitat on the project site. Woodrats from this community will also forage in oak woodland habitats on the project site. Construction of the project could result in the injury or mortality of individual woodrats and disturbance or destruction of nests and young, leading to increased predation risk on woodrats flushed from nests, as a result of vegetation clearing and operation of equipment.

Although woodrats are abundant in the project region, they are very important ecologically in that they provide an important prey source for raptors (particularly owls) and for predatory mammals, and their nests also provide habitat for a wide variety of small mammals, reptiles, and amphibians. Thus, in our opinion, impacts of the project on four woodrat nests would be considered significant under CEQA.

Implementation of Mitigation Measures BIO-1 through BIO-3 below would reduce this impact to a less-than-significant level under CEQA.

Mitigation Measure BIO-1. Pre-Activity Survey. A qualified biologist will conduct a pre-activity survey for San Francisco dusky-footed woodrat nests within 30 days of the start of work activities. If active woodrat nests are determined to be present in, or within 10 feet of, the impact areas, Measures 2 and 3 below will be implemented, as appropriate.

Mitigation Measure BIO-2. Avoidance Buffers. Active woodrat nests that are detected within the work areas will be avoided to the extent feasible. Ideally, a minimum 10-foot buffer will be maintained between project activities and woodrat nests to avoid disturbance. In some situations, a smaller buffer may be allowed if, in the opinion of a qualified biologist, nest relocation (Measure BIO-3 below) would represent a greater disturbance to the woodrats than the adjacent work activities.

Mitigation Measure BIO-3. Nest Relocation. If avoidance of active woodrat nests within and immediately adjacent to the work areas is not feasible, then nest materials will be relocated to suitable habitat as close to the project area as possible (ideally, within or immediately adjacent to the project site). Relocation efforts will avoid the peak nesting season (February–July) to the maximum extent feasible.

Prior to the start of work activities, a qualified biologist will disturb the woodrat nest to the degree that all woodrats leave the nest and seek refuge outside of the construction area. Disturbance of the woodrat nest will be initiated no earlier than one hour before dusk to prevent the exposure of woodrats to diurnal predators. Subsequently, the biologist will dismantle and relocate the nest material by hand. During the deconstruction process, the biologist will attempt to assess if there are juveniles in the nest. If immobile juveniles are observed, the deconstruction process will be discontinued until a time when the biologist believes the juveniles will be capable of independent survival (typically after 2 to 3 weeks). A no-disturbance buffer will be established around the nest until the juveniles are mobile. The nest may be dismantled once the biologist has determined that adverse impacts on the juveniles would not occur.

Implementation of these measures would minimize impacts of the project on the San Francisco dusky-footed woodrat, and no compensatory mitigation (beyond the relocation of nest materials described above) would be necessary.

6.1.6 Impacts on California Giant Salamander (Less than Significant)

There is a low potential for California giant salamander to occur on the project site when construction occurs, and thus, the project is unlikely to impact this species. However, the possibility that a small number of individuals could occur on the project site cannot be eliminated. Individuals, if present, could be directly impacted by construction activities associated with the project. Individuals may be crushed by foot traffic, vehicles, or equipment, or crushed, trapped, and/or suffocated in their refugia by the passage of heavy equipment. An increase in native and nonnative predators attracted to the project site due to trash left on the work site might temporarily result in increased mortality of individuals of these species. Because project activities will be limited to upland areas, and no impacts on the species' primary habitats (i.e., rocks and woody debris along Adobe Creek, or aquatic habitat in Adobe Creek) would occur, the number of individuals that could be impacted by the project is extremely small (i.e., one or two individuals of each species, at most). Because these impacts would represent such a small proportion of these species' regional populations, they would not rise to the CEQA standard of having a *substantial* adverse effect. For these reasons, project impacts on individual California giant salamanders would be less than significant under CEQA.

Project activities will be limited to upland areas, and no impacts on primary habitats for the California giant salamander (i.e., rocks and woody debris along the creek, or aquatic habitat in the channel) would occur. However, project activities could indirectly impact suitable habitat for these species along Adobe Creek due to a temporary increase in erosion, sedimentation, and turbidity downslope of the work area. Additionally, minor spills of petrochemicals, hydraulic fluids, and solvents may occur during vehicle and equipment refueling. Such leaks/spills could adversely affect water quality downstream of construction activities, potentially impairing the health of eggs or larvae along the creek. However, potential indirect impacts on habitat and individuals due to a reduction in water quality would be avoided and minimized as described in Section 6.1.2 above, and would be less than significant under CEQA.

6.1.7 Impacts on Common and Special-Status Roosting Bats (Less than Significant with Mitigation)

The large coast live oak trees on the project site provide suitable roosting habitat for common bat species, such as the Yuma myotis, California myotis, and big brown bat (*Eptesicus fuscus*), as well as the pallid bat, a California species of special concern. The Townsend's big-eared bat, a California species of special concern, is known to roost in the Halsey House building. These species are grouped together because project impacts on these species will be similar.

Although the trees on the site provide suitable roosting habitat, no evidence of a colony of roosting bats was detected in trees on the site during the May 2024 focused surveys, indicating that bats are not roosting in these trees currently, and no maternity colony is present. Due to the absence of bats during this survey, bats are not expected to be impacted during tree removal or modification.

One individual Townsend's big-eared bat was observed roosting within the Halsey House structure during the May 7 focused survey, and small numbers of calls of this species were recorded within the structure during five nights of acoustic monitoring, indicating that a nonbreeding roost of one or a few individual male bats is present. When the Halsey House building is demolished, individual Townsend's big-eared bats can be physically injured or killed, can be subjected to physiological stress from disturbance during torpor, or can face increased predation because of exposure during daylight. However, no nursing young would be affected. Impacts due to the loss of individual nonbreeding Townsend's big-eared bats would be significant under CEQA, as this could have a substantial effect on the species' small regional population. However, impacts due to the removal of the Halsey House building would be less than significant, as such roosting habitat for small numbers of nonbreeding individuals is widely available in the region. The following measure to avoid and minimize impacts on roosting Townsend's big-eared bats will reduce project impacts on this species to less-than-significant levels under CEQA.

Mitigation Measure BIO-4. Bat Exclusion from Halsey House. Prior to the start of any project-related activities on the exterior or interior of the Halsey House building, a qualified bat biologist will guide and supervise the installation of appropriate exclusion devices to allow any roosting Townsend's big-eared bats (and other bat species, if present) to vacate the roost and prevent bats from reoccupying these features before construction activities are initiated. Bird exclusion netting shall not be used because bats may become entangled in it, potentially leading to mortality. Exclusion materials will be inspected once per month between their installation and initiation of building demolition, to ensure that the materials are in good working order. If exclusion materials become compromised, the applicant shall perform maintenance on these devices, as directed by the qualified bat biologist.

6.2 Impacts on Sensitive Communities: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS (Less than Significant)

6.2.1 Impacts on Riparian Habitat or Other Sensitive Natural Communities (Less than Significant)

The CDFW defines sensitive natural communities and vegetation alliances using NatureServe's standard heritage program methodology (CDFW 2024), as described above in Section 5.3. Aquatic, wetland, and riparian habitats are also protected under applicable federal, state, or local regulations, and are generally subject to regulation, protection, or consideration by the USACE, RWQCB, CDFW, and/or the USFWS (see Section 6.3 below). Project impacts on sensitive natural communities, vegetation alliances/associations, or any such community identified in local or regional plans, policies, and regulations, were considered and evaluated.

Adobe Creek flows from southwest to northeast adjacent to, but not through, the project site. The entirety of ground-disturbing project impacts will occur outside of the riparian corridor; thus, the proposed project will have no direct permanent or temporary impacts on riparian habitat. There is potential for indirect effects to

occur within riparian areas downslope of the project site if runoff from the project increases in intensity or frequency due to the proposed project. However, required construction-period BMPs and post-construction stormwater requirements will apply to the proposed project as discussed above in Section 6.1.2, and these requirements would avoid and reduce these impacts to a less-than-significant level.

No other sensitive natural communities are located on the project site or would be affected by the proposed project.

6.3 Impacts on Wetlands: Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (Less than Significant)

No wetlands or other waters of the U.S./state are present on the project site. Adobe Creek, located 16 feet downslope of the project site to the northwest, supports other waters of the U.S./state but does not support wetlands. The project will avoid all direct impacts on state or federally protected aquatic habitats within this creek.

Because Adobe Creek is located downslope of the project site, there is some potential for the project to result in indirect impacts on other waters of the U.S./state within this creek. However, the project will comply with required construction period BMPs and post-construction storm water requirements will apply to the project as discussed above in Section 6.1.2, and these requirements would minimize increases of peak discharge of storm drain water and to reduce runoff of pollutants to protect water quality, including during construction. Thus, with compliance with permit requirements, potential project impacts on other waters would be less than significant under CEQA.

6.4 Impacts on Wildlife Movement: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites (Less than Significant)

6.4.1 Impacts on Wildlife Movement (Less than Significant)

For many species, the landscape is a mosaic of suitable and unsuitable habitat types. Environmental corridors are segments of land that provide a link between these different habitats while also providing cover. Development that fragments natural habitats (i.e., breaks them into smaller, disjunct pieces) can have a twofold impact on wildlife: first, as habitat patches become smaller they are unable to support as many individuals (patch size); and second, the area between habitat patches may be unsuitable for wildlife species to traverse (connectivity).

Adobe Creek and the associated riparian corridor provide an important movement pathway for both aquatic and terrestrial wildlife species, connecting natural areas in the project vicinity. Songbirds that migrate along the Pacific Flyway disperse and forage along Adobe Creek in low to moderate numbers. Common, urban-adapted species such as raccoons and striped skunks may use the vegetation along the creek to move north and south through the Los Altos area. Small mammals, such as mice and shrews, will also use this vegetation to move between habitats. Common species of reptiles and amphibians, such as Pacific treefrogs and alligator lizards, amongst other species, are also expected to move along this corridor adjacent to the project site. The proposed demolition of Halsey House will not result in any loss of aquatic, wetland, or riparian habitat along Adobe Creek or in any substantial reduction in the value of the Adobe Creek corridor for wildlife movement. The removal of the Halsey House building within the 80-foot setback adjacent to the creek is expected to provide at least a minor improvement in conditions within the setback, potentially allowing animals to move more readily along the adjacent section of the creek. Thus, aquatic and terrestrial species would continue to be able to move north to south along Adobe Creek following completion of the project, without any substantial reduction in such movement. Therefore, the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and this impact is determined to be less than significant.

6.5 Impacts due to Conflicts with Local Policies: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (Less than Significant with Mitigation)

6.5.1 Impacts Due to the Removal of Ordinance-Sized Trees (Less than Significant)

The project may remove existing trees on the site, including protected trees as defined by the City (see Section 3.3.1 above), and the applicant will submit a permit application for tree removal. In accordance with the City's Municipal Code, the City will comply with applicable permit conditions including installing protective fencing; maintaining the existing grade out to the dripline of the tree; installing drain wells where impervious surfaces will be placed over a tree's root system; repairing trees that are damaged by construction, and avoiding attachment of signs, wires, or other objects to the tree. Conditions of approval for tree removal may also include planting replacement trees. With the incorporation of these measures to ensure compliance with the Los Altos Hills Municipal Code, any potential impacts related to conflicts with local policies or ordinances protecting trees would be less than significant.

6.5.2 Impacts Due to Encroachment into the Stream/Riparian Corridor (Less than Significant)

To protect the ecological functions and values of a stream, buffers are often prescribed between new development and the stream (or its banks or associated riparian habitat). These buffers provide habitat for plants and animals associated with the stream, provide habitat connectivity (i.e., areas used for wildlife movement, including flight paths for birds), reduce indirect effects of adjacent development (e.g., noise, lighting, human activity, or invasive species) on the natural stream and riparian habitats, allow for the possible

future expansion of natural habitat, help to maintain site hydrology, and in some areas allow for runoff to be treated (e.g., by flowing through vegetated areas) before it enters the stream. In addition, vegetative communities within stream buffers may provide important refugia for animals associated with wetland and riparian habitats along the creek during flood events, when little to no such refugia may be present within the banks of the creek itself. In general, larger buffers protect more of the ecological functions and values of the stream than smaller buffers.

As discussed in Section 3.3.2 above, the City's Watercourse Protection Regulations state that a protected stream setback is present along Adobe Creek, and extends a horizontal distance of 80 feet measured from the top of bank. This setback overlaps the project site, as shown on Figure 3. In our opinion, based on the moderate quality of the riparian habitat along Adobe Creek and the wildlife community present at this location (discussed in Section 4.3 above), the City's specified 80-foot-wide setback measured from the top of bank is an appropriate buffer distance between new construction and Adobe Creek to maintain suitable riparian functions and values.

Under the proposed project, certain areas within the setback on the project site would be modified in some way. Currently, the setback area on the project site consists predominantly of developed areas, with 243 square feet of coast live oak woodland (Figure 3). The project would permanently remove the Halsey House building from the setback, and some trees within the setback may be removed or modified to accommodate the project. The demolition of Halsey House and the removal of 243 square feet of coast live oak woodland within the setback would require a setback exception from the City, because vegetation would be removed and grading would occur. However, it is our understanding that the City will grant an exception for all project activities within the 80-foot setback along Adobe Creek. Thus, project impacts due to conflicts with the City's Watercourse Protection Regulations are less than significant.

Further, the removal of the Halsey House building is expected to provide at least a minor improvement in habitat conditions within the setback. Removal of the building may provide animals in the riparian corridor with less of a sense that they are "hemmed in" by adjacent development, and the building footprint will become ruderal habitat that will provide some habitat value (e.g., as foraging habitat) for animals associated with the creek corridor. Although up to 243 square feet of coast live oak woodland habitat may be removed or trimmed, these impact areas will be reseeded or replanted, and the net effect of the project will be ecologically beneficial due to removal of the building. Therefore, the project's encroachment into the stream corridor (consisting of removal of Halsey House, converting 243 square feet of coast live oak woodland to developed areas, and reseeded or planting impacted areas) would not be considered a significant biological impact under CEQA.

6.6 Impacts due to Conflicts with an Adopted Habitat Conservation Plan: Conflict with the provisions of an adopted habitat conservation plan,

natural community conservation plan, or other approved local, regional, or state habitat conservation plan (No Impact)

The project site is not located within an area covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with any such plans.

6.7 Cumulative Impacts (Less than Significant)

Cumulative impacts arise due to the linking of impacts from past, current, and reasonably foreseeable future projects in the region. Future development activities in Los Altos will result in impacts on the same habitat types and species that will be affected by the proposed project. The proposed project, in combination with other projects in the area and other activities that impact the species that are affected under the project, could contribute to cumulative effects on special-status species. Other projects in the area include both development and maintenance projects that could adversely affect these species and restoration projects that will benefit these species.

The cumulative impact on biological resources resulting from the project in combination with other projects in the larger region would be dependent on the relative magnitude of adverse effects of these projects on biological resources compared to the relative benefit of impact avoidance and minimization efforts prescribed by planning documents, CEQA mitigation measures, and permit requirements for each project; and compensatory mitigation and proactive conservation measures associated with each project. In the absence of such avoidance, minimization, compensatory mitigation, and conservation measures, cumulatively significant impacts on biological resources would occur.

However, many projects in the region that impact resources similar to those impacted by the project will be subject to CEQA requirements. It is expected that such projects will mitigate their impacts on sensitive habitats and special-status species through the incorporation of mitigation measures and compliance with permit conditions.

Regardless of the magnitude and significance of cumulative impacts that result from other projects, the proposed project is not expected to have a substantial effect on biological resources, and would implement the mitigation measure described above to reduce impacts under CEQA to less than significant levels. Thus, provided that this project successfully incorporates the mitigation measure described in this biological resources report, the project will not have a cumulatively considerable contribution to cumulative effects on biological resources.

Section 7. Compliance with Additional Laws and Regulations for Nesting Birds

Several species of common native birds protected by the MBTA and California Fish and Game Code may nest in trees and shrubs on the site or immediately adjacent to the site. It is also possible that protected native birds could nest on the buildings on the site. The removal of vegetation or demolition of buildings supporting active nests may cause the direct loss of eggs or young, while construction-related activities located near an active nest may cause adults to abandon their eggs or young. This type of impact would not be significant under CEQA, in our opinion, because of the local and regional abundances of the species that could potentially nest on the site and the very low magnitude of the potential impact of development on these species (i.e., the project is expected to impact only a few pairs of these species, which is not a substantial impact on their regional populations). However, the following measures should be implemented to ensure that project activities do not violate the MBTA and California Fish and Game Code:

Measure 1. Avoidance of the Nesting Season. To the extent feasible, the initiation of commencement of demolition and construction activities should be scheduled to avoid the nesting season. If demolition and construction activities are initiated outside the nesting season, all potential demolition/construction impacts on nesting birds protected under the MBTA and California Fish and Game Code will be avoided. The nesting season for most birds in San Mateo County extends from February 1 through August 31.

Measure 2. Pre-Activity/Pre-Disturbance Surveys. If it is not possible to schedule the initiation of demolition and construction activities between September 1 and January 31, then pre-activity surveys for nesting birds should be conducted by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. We recommend that these surveys be conducted no more than seven days prior to the initiation of demolition or construction activities. During this survey, the ornithologist will inspect all trees and other potential nesting habitats (e.g., trees, shrubs, and buildings) in and immediately adjacent to the impact areas for nests.

Measure 3. Non-Disturbance Buffers. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist will determine the extent of a construction-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation.

Measure 4. Nesting Deterrence. If construction activities will not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are scheduled to be removed by the project may be removed prior to the start of the nesting season (e.g., prior to February 1). This will preclude the initiation of nests in this vegetation, and minimize the potential delay of the project due to the presence of active nests in these substrates.

Section 8. References

- Barry, S. 1994. The distribution, habitat, and evolution of the San Francisco garter snake, *Thamnophis sirtalis tetrataenia*. Unpublished Masters Dissertation, UC Davis, 143 pages.
- Bay Area Puma Project. 2024. Sightings Map. Accessed through July 2024 from <https://bapp.org/meet-puma/sightings>.
- Bousman, W.G. 2007a. Olive-Sided Flycatcher, *Contopus cooperi*. Pages 272-273 in W. G. Bousman, editor. Breeding Bird Atlas of Santa Clara County. Santa Clara Valley Audubon Society, Cupertino, California.
- Bousman, W. G. 2007b. Loggerhead shrike *Lanius ludovicianus*. Pages 288-289 in W. G. Bousman, editor. Breeding bird atlas of Santa Clara County. Santa Clara Valley Audubon Society, Cupertino, California.
- Bumble Bee Watch. 2024. Bumble Bee Sightings Map. Accessed through July 2024 from <https://www.bumblebeewatch.org/app/#/bees/map>.
- Calflora. 2024. Calflora: Information on California Plants for Education, Research and Conservation. The Calflora Database, Berkeley, California. Accessed through July 2024 from <https://www.calflora.org/>.
- [Cal-IPC] California Invasive Plant Council. 2024. California Invasive Plant Inventory Database. Accessed through July 2024 from <http://www.cal-ipc.org/paf/>.
- [CDFW] California Department of Fish and Wildlife. 2019. Report to the Fish and Game Commission. Evaluation of the petition from the Xerces Society, Defenders of Wildlife, and the Center for Food Safety to list four species of bumble bees as endangered under the California Endangered Species Act. April 4.
- [CDFW] California Department of Fish and Wildlife. 2024. Vegetation Classification and Mapping Program: Natural Communities List. Accessed through July 2024 from <https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities>.
- [CNDDB] California Natural Diversity Database. 2024. Rarefind 5.0. California Department of Fish and Wildlife. Accessed July 2024 from <http://www.dfg.ca.gov/biogeodata/cnddb/mapsanddata.asp>.
- [CNPS] California Native Plant Society. 2024. Inventory of Rare and Endangered Plants (online edition, v8-03 0.39). Accessed May 2024 from <http://www.cnps.org/inventory>.

Cornell Lab of Ornithology. 2024. eBird. Accessed through July 2024 from <http://www.ebird.org/>.

Faber-Langendoen, D., J. Nichols, L. Master, K. Snow, A. Tomaino, R. Bittman, G. Hammerson, B. Heidel, L. Ramsay, A. Teucher, and B. Young. 2012. NatureServe Conservation Status Assessments: Methodology for Assigning Ranks. NatureServe, Arlington, VA.

Google Inc. 2024. Google Earth Pro (version 7.3.2.5776) [Software]. Available from earth.google.com.

iNaturalist. 2024. Accessed through July 2024 from: <https://www.inaturalist.org/observations>.

Leidy, R. A. 2007. Ecology, assemblage structure, distribution, and status of fishes in streams tributary to the San Francisco Estuary, California. San Francisco Estuary Institute Contribution No. 530.

Leidy, R. A., G. Becker, and B. N. Harvey. 2005. Historical status of Coho salmon in streams of the urbanized San Francisco Estuary, California. California Fish and Game 91:219-254.

[NRCS] Natural Resource Conservation Service. 2024. Web Soil Survey. U.S. Department of Agriculture. Accessed July 2024 from: <http://websoilsurvey.nrcs.usda.gov>.

National Wetlands Inventory. 2024. Wetlands Mapper. U.S. Fish and Wildlife Service. Accessed July 2024 from <https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper>.

Peninsula-Birding List Serve. 2024. <https://groups.io/g/peninsula-birding>. Accessed through July 2024.

PRISM Climate Group. 2024. Online PRISM Data Explorer. Oregon State University, Corvallis, OR. Accessed July 2024 from: <http://www.prism.oregonstate.edu/>.

Rottenborn, S. C. 2007a. Tricolored blackbird *Agelaius tricolor*. Pages 426-427 in W. G. Bousman, editor. Breeding Bird Atlas of Santa Clara County. Santa Clara Valley Audubon Society, Cupertino, California.

Rottenborn, S.C. 2007b. Vaux's Swift, *Chaetura vauxi*. Pages 244-245 in W. G. Bousman, editor. Breeding Bird Atlas of Santa Clara County. Santa Clara Valley Audubon Society, Cupertino, California.

Sawyer, J. O., T. Keeler-Wolf and J. M. Evens. 2009. A Manual of California Vegetation [online]. Second Edition. California Native Plant Society.

Sequoia Audubon Society. 2001. San Mateo County Breeding Bird Atlas. May.

Xerces Society. 2024. Western Monarch Overwintering Site Viewer. Accessed July 2024 from <https://www.westernmonarchcount.org/map-of-overwintering-sites/>.

Appendix A. Plants Observed

Family	Scientific Name	Common Name	Cal-IPC Rank ¹
Lauraceae	<i>Umbellularia californica</i>	California bay	
Anacardiaceae	<i>Schinus molle</i> *	pepper tree	Limited
Anacardiaceae	<i>Toxicodendron diversilobum</i>	poison oak	
Apiaceae	<i>Torilis arvensis</i> *	tall sock-destroyer	Moderate
Apocynaceae	<i>Vinca major</i> *	greater periwinkle	Moderate
Araliaceae	<i>Hedera helix</i> *	English ivy	High
Asteraceae	<i>Artemisia californica</i>	California sagebrush	
Asteraceae	<i>Carduus pycnocephalus</i> ssp. <i>pycnocephalus</i> *	Italian thistle	Moderate
Cucurbitaceae	<i>Marah fabacean</i>	California man-root	
Fabaceae	<i>Genista monspessulana</i> *	French broom	High
Fabaceae	<i>Medicago polymorpha</i> *	variable burclover	Limited
Fabaceae	<i>Trifolium hirtum</i> *	Rose clover	Moderate
Fagaceae	<i>Quercus agrifolia</i>	coast live oak	
Fagaceae	<i>Quercus lobata</i>	valley oak	
Grossulariaceae	<i>Ribes californicum</i>	Hillside gooseberry	
Lamiaceae	<i>Monardella villosa</i> ssp. <i>villosa</i>	coyote-mint	
Lamiaceae	<i>Salvia leucophylla</i>	purple sage	
Lamiaceae	<i>Salvia mellifera</i>	black sage	
Lamiaceae	<i>Salvia spathacea</i>	California hummingbird sage	
Montiaceae	<i>Claytonia parviflora</i>	small-flowered claytonia	
Oleaceae	<i>Ligustrum sp.</i> *	privet	
Papaveraceae	<i>Eschscholzia californica</i>	California poppy	
Polygonaceae	<i>Rumex crispus</i> *	curly dock	Limited
Ranunculaceae	<i>Ranunculus californicus</i>	California buttercup	
Rhamnaceae	<i>Frangula californica</i>	California coffee berry	
Rosaceae	<i>Fragaria vesca</i>	wood strawberry	
Rosaceae	<i>Heteromeles arbutifolia</i>	toyon	
Rosaceae	<i>Rubus ursinus</i>	California blackberry	
Rubiaceae	<i>Galium aparine</i>	goose grass	
Sapindaceae	<i>Aesculus californica</i>	California buckeye	
Simaroubaceae	<i>Ailanthus altissima</i> *	tree of heaven	Moderate

Viburnaceae	<i>Sambucus mexicana</i>	blue elderberry	
Iridaceae	<i>Iris douglasiana</i>	Douglas iris	
Poaceae	<i>Bromus diandrus</i> *	ripgut brome	Moderate
Poaceae	<i>Bromus hordeaceus</i> *	soft chess	Limited
Poaceae	<i>Hordeum murinum</i> *	foxtail barley	Moderate
Poeceae	<i>Poa annua</i> *	annual blue grass	

¹Cal-IPC Ranks (Cal-IPC 2024):

- Watch List – These species are predicted to become invasive if no further actions are taken. Distribution may range from limited to widespread in specific regions.
- Limited – These species are invasive, but their ecological impacts are minor on a statewide level. They have low to moderate rates of colonization. Although their distribution is generally limited, these species may be locally persistent and problematic.
- Moderate – These species have substantial and apparent—but generally not severe—ecological impacts on the surrounding habitat. They have moderate to high rates of dispersal. Distribution may range from limited to widespread.
- High – These species have severe ecological impacts on the surrounding habitat. They have moderate to high rates of dispersal and establishment, and most are widely distributed.

*Nonnative or invasive species

Appendix B. Special-Status Plants Considered but Rejected for Occurrence

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records
San Mateo thorn-mint	<i>Acanthomintha duttonii</i>	X	X		
Franciscan onion	<i>Allium peninsulare</i> var. <i>franciscanum</i>		X		
California androsace	<i>Androsace elongata</i> ssp. <i>acuta</i>				X
slender silver moss	<i>Anomobryum julaceum</i>		X	X	
coast rockcress	<i>Arabis blepharophylla</i>		X		
Anderson's manzanita	<i>Arctostaphylos andersonii</i>	X			
Schreiber's manzanita	<i>Arctostaphylos glutinosa</i>		X	X	
Ohlone manzanita	<i>Arctostaphylos ohloneana</i>	X	X	X	
Kings Mountain manzanita	<i>Arctostaphylos regismontana</i>	X	X	X	
Bonny Doon manzanita	<i>Arctostaphylos silvicola</i>	X	X	X	
Humboldt County milk-vetch	<i>Astragalus agnicidus</i>			X	
alkali milk-vetch	<i>Astragalus tener</i> var. <i>tener</i>	X	X	X	
Brittlescale	<i>Atriplex depressa</i>	X	X		
lesser saltscale	<i>Atriplex minuscula</i>	X	X		
Brewer's calandrinia	<i>Calandrinia breweri</i>	X	X		
Santa Cruz Mountains pussypaws	<i>Calyptridium parryi</i> var. <i>hessae</i>		X	X	
Congdon's tarplant	<i>Centromadia parryi</i> ssp. <i>congdonii</i>	X			X
Point Reyes salty bird's-beak	<i>Chloropyron maritimum</i> ssp. <i>palustre</i>	X		X	X
Ben Lomond spineflower	<i>Chorizanthe pungens</i> var. <i>hartwegiana</i>	X	X		
robust spineflower	<i>Chorizanthe robusta</i> var. <i>robusta</i>	X	X		

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records
Mt. Hamilton thistle	<i>Cirsium fontinale</i> var. <i>fontinale</i>	X	X		
fountain thistle	<i>Cirsium fontinale</i> var. <i>campylon</i>	X	X		
lost thistle	<i>Cirsium praeteriens</i>		X	X	X
Brewer's clarkia	<i>Clarkia breweri</i>		X	X	
Santa Clara red ribbons	<i>Clarkia concinna</i> ssp. <i>automixa</i>	X			
Lewis clarkia	<i>Clarkia lewisii</i>	X			X
round-headed Chinese-houses	<i>Collinsia corymbosa</i>	X		X	X
San Francisco collinsia	<i>Collinsia multicolor</i>	X	X		
clustered lady's-slipper	<i>Cypripedium fasciculatum</i>	X	X	X	
western leatherwood	<i>Dirca occidentalis</i>	X			
Santa Clara Valley dudleya	<i>Dudleya abramsii</i> ssp. <i>setchellii</i>	X		X	
small spikerush	<i>Eleocharis parvula</i>	X	x		
San Mateo woolly sunflower	<i>Eriophyllum latilobum</i>	X	X		
Hoover's button-celery	<i>Eryngium aristulatum</i> var. <i>hooveri</i>	X	X	X	
Jepson's coyote-thistle	<i>Eryngium jepsonii</i>	X	X		
San Francisco wallflower	<i>Erysimum fanciscanum</i>		X		X
San Joaquin spearscale	<i>Extriplex joaquinana</i>	X	X		X
minute pocket moss	<i>Fissidens pauperculus</i>	X			
fragrant fritillary	<i>Fritillaria liliacea</i>		X		
phlox leaf serpentine bedstraw	<i>Galium andrewsii</i> ssp. <i>gatense</i>		X	X	
Toren's grimmia	<i>Grimmia torenii</i>	X	X		
vaginulate grimmia	<i>Grimmia vaginulata</i>	X	X		
San Francisco gumplant	<i>Grindelia hirsutula</i> var. <i>martitima</i>	X	x		
short-leaved evax	<i>Hesperervax sparsiflora</i> var. <i>brevifolia</i>	X			X
Santa Cruz cypress	<i>Hesperocyparis abramsiana</i> var. <i>abramsiana</i>	X	X	X	
Butano Ridge cypress	<i>Hesperocyparis abramsiana</i> var. <i>butanoensis</i>	X	X	X	
Marin western flax	<i>Hesperolinon congestum</i>	X	X		
Loma Prieta hoita	<i>Hoita strobilina</i>	X	X		X

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records
harlequin lotus	<i>Hosackia gracilis</i>		X		
coast iris	<i>Iris longipetala</i>	X			
Contra Costa goldfields	<i>Lasthenia conjugens</i>		X		X
legenere	<i>Legenere limosa</i>	X			X
serpentine leptosiphon	<i>Leptosiphon ambiguus</i>		X		
bristly leptosiphon	<i>Leptosiphon aureus</i>				X
large-flowered leptosiphon	<i>Leptosiphon grandiflorus</i>		X		
broad-lobed leptosiphon	<i>Leptosiphon latisectus</i>			X	X
woolly-headed lessingia	<i>Lessingia hololeuca</i>	X	X		
smooth lessingia	<i>Lessingia micradenia</i> var. <i>glabrata</i>		X	X	
spring lessingia	<i>Lessingia tenuis</i>			X	
Hall's bushmallow	<i>Malacothamnus hallii</i>	X			
Woodland woollythreads	<i>Monolopia gracilens</i>		X	X	
Prostrate vernal pool navarretia	<i>Navarretia prostrata</i>	X	X		
Kellman's bristle moss	<i>Orthotrichum kellmanii</i>	X	X		
Dudley's lousewort	<i>Pedicularis dudleyi</i>	X	X		
Santa Cruz Mountains beardtongue	<i>Penstemon rattanii</i> var. <i>kleei</i>	X		X	X
white-rayed pentachaeta	<i>Pentachaeta bellidiflora</i>		X		X
white-flowered rein orchid	<i>Piperia candida</i>	X	X		
Michael's rein orchid	<i>Piperia michaelii</i>	X			X
Choris' popcornflower	<i>Plagiobothrys chorisianus</i> var. <i>chorisianus</i>	X	X		
Hickman's popcornflower	<i>Plagiobothrys chorisianus</i> var. <i>hickmanii</i>	X			
hairless popcornflower	<i>Plagiobothrys glaber</i>	X			X
California alkali grass	<i>Puccinellia simplex</i>	X	X		
Lobb's aquatic buttercup	<i>Ranunculus lobbii</i>	X			
Sanford's arrowhead	<i>Sagittaria sanfordii</i>	X			
Hoffmann's sanicle	<i>Sanicula hoffmannii</i>	X	X		
rock sanicle	<i>Sanicula saxatilis</i>		X	X	

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records
chaparral ragwort	<i>Senecio aphanactis</i>	X	X		
Santa Cruz microseris	<i>Stebbinsoseris decipiens</i>		X		X
most beautiful jewelflower	<i>Streptanthus albidus</i> ssp. <i>peramoenus</i>	X	X		
northern slender pondweed	<i>Stuckenia filiformis</i> ssp. <i>alpina</i>	X		X	X
California seablite	<i>Suaeda californica</i>	X		X	X
two-fork clover	<i>Trifolium amoenum</i>	X			X
Santa Cruz clover	<i>Trifolium buckwestiorum</i>	X	X		
saline clover	<i>Trifolium hydrophilum</i>	X			X
Pacific Grove clover	<i>Trifolium polyodon</i>	X	X		
Methuselah's beard lichen	<i>Usnea longissima</i>	X	X		

HALSEY HOUSE HISTORIC RESOURCE EVALUATION

LOS ALTOS, CALIFORNIA
[21130]

PREPARED FOR THE CITY OF LOS ALTOS
August 30, 2021



Cover image: Theodore and Emma Halsey in the rear courtyard of Halsey House, circa 1924. Source: Los Altos History Museum Collections.

TABLE OF CONTENTS

I. INTRODUCTION.....	1
Methodology	1
Summary of Findings	2
II. EXISTING HISTORIC STATUS.....	4
National Register of Historic Places	4
California Register of Historical Resources	4
California Historical Resource Status Codes	4
City of Los Altos Historic Resource Inventory (HRI).....	5
III. ARCHITECTURAL DESCRIPTION	7
IV. HISTORIC CONTEXT	16
Brief History of Los Altos	16
V. SITE HISTORY	19
Site Development	19
Construction Chronology of the Halsey House.....	19
Development of the Redwood Grove Landscape and Site	27
Ownership and Occupancy History	30
Select Owner and Occupant Biographies.....	34
The Design of the Halsey House	36
VI. EVALUATION.....	39
California Register of Historical Resources	39
Criterion 1 (Events)	39
Criterion 2 (Persons).....	40
Criterion 3 (Design/Architecture).....	42
Criterion 4 (Information Potential).....	43
Integrity	43
Character-Defining Features	46
Los Altos Historic Landmark and Historic Resource Criteria	48
Halsey House as a Designated Historic Landmark.....	48
Halsey House as a Contributor to a Possible Historic District	49
VII. CONCLUSION	51
VIII. REFERENCES	52
IX. APPENDIX	55
Significance and Chronology Diagrams of the Halsey House	55

I. INTRODUCTION

This Historic Resource Evaluation (HRE) has been prepared at the request of the City of Los Altos for the building at 482 University Avenue (located within APN 175-30-021), historically called the Halsey House. The Halsey House, which is located in the approximately six-acre Redwood Grove, is owned by the City of Los Altos. The property is located along the city boundary of Los Altos and Los Altos Hills to the west. It is reached via an access road on the west side of University Avenue (**Figure 1**).

Built in 1923 for Theodore Vail Halsey and Emma Wright Halsey by an unknown architect, the Halsey House was used as a single-family residence until 1945. In 1945, the property was sold to the Besseys and was converted into two residential units soon after. In 1974, the property was purchased by the City of Los Altos to serve as a park. At that time, the building was converted to a nature center for educational and recreational programming. In 2008, the building was closed to the public, and since 2008, the Halsey House has been vacant.

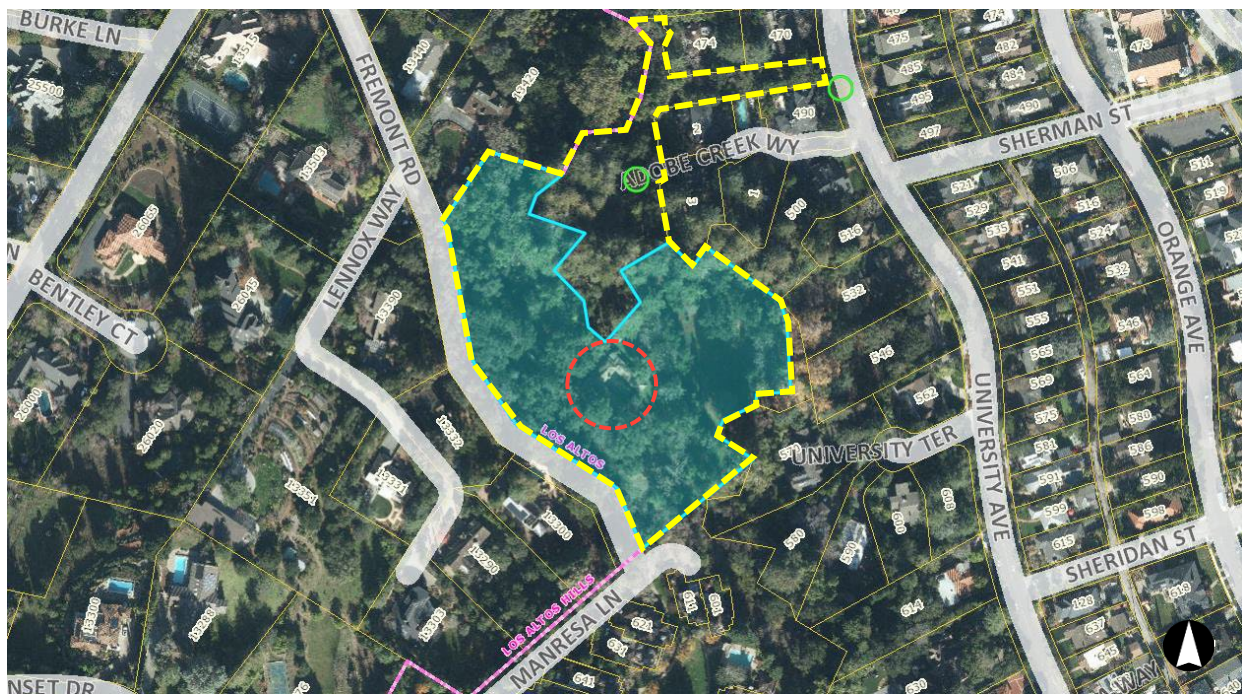


Figure 1: The location of the subject property (shaded blue), with the Halsey House identified by the dashed red circle. The larger area of Redwood Grove and the approximate boundary of the historic property of Halsey House is shown with a dashed yellow line. Source: Santa Clara County SCC Map.

Methodology

This report follows a standard outline for Historic Resource Evaluations (HREs) and provides a summary of the building's current historic status, an architectural description, a historic context for

the development of the Halsey House and Los Altos, and a narrative description of the subsequent changes to the Halsey House since its construction in 1923. This report includes an evaluation of the property's eligibility for listing in the California Register of Historical Resources and includes an updated evaluation of the property according to the Los Altos Historic Resource Inventory Criteria for Evaluation.

Page & Turnbull prepared this report using research provided by the City of Los Altos and the Los Altos History Museum, as well as various online sources including Ancestry.com, the California Digital Newspaper Collection, and Newspapers.com. Key primary sources consulted and cited in this report include Sanborn Map Company fire insurance maps, City of Los Altos records, historical newspapers, a 2001 oral history with Eugenia Halsey Buss in the collection of the Los Altos History Museum, and historic photographs provided by the Los Altos History Museum and Katherine Halsey Buss. Page & Turnbull also reviewed secondary source material including the *Halsey House Historic Structures Report* completed by Architectural Resources Group (ARG) in 2019, as well as additional reports on the building's material and structural condition, and studies on its reuse.

Page & Turnbull staff conducted a site visit to the Halsey House on June 22, 2021. All photographs within this report were taken at that time, unless otherwise noted.

Summary of Findings

This Historic Resource Evaluation finds that the Halsey House is eligible for the California Register under Criterion 1 (Events) at the state level of significance as an excellent example of the residential development patterns of Los Altos and for the establishment of the Redwood Grove, which is a unique property developed by Emma Halsey and her Japanese gardener, Mori, in the 1920s. Page & Turnbull did not find the property significant under Criterion 2 (Persons), Criterion 3 (Design/Architecture), or Criterion 4 (Information Potential).

Additionally, Page & Turnbull reviewed the Halsey House's existing historic status as a City of Los Altos Historic Landmark and found that the building continues to meet the necessary criteria for age and physical integrity, despite the ongoing issues of the building's condition. While Page & Turnbull found the property to be eligible for the California Register under different criteria than it was listed under as a local landmark, Page & Turnbull agrees that the property is a rare or unique example and remains eligible as a Historic Landmark of Los Altos.

The Halsey House was additionally identified as a possible contributor to the University/Orange Historic District during the 1990 architectural survey. This district has never been formally adopted. From an initial review of the University/Orange Historic District, Page & Turnbull believes that the

Halsey House does not fit the overall character of the eligible district due to its secluded location far removed from the street and its unique wooded and semi-rural setting.

II. EXISTING HISTORIC STATUS

The following section examines the national, state, and local historic status currently assigned to the Halsey House.

National Register of Historic Places

The National Register of Historic Places (National Register) is the nation's most comprehensive inventory of historic resources. The National Register is administered by the National Park Service and includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

The subject property is not currently listed on the National Register.

California Register of Historical Resources

The California Register of Historical Resources (California Register) is an inventory of significant architectural, archaeological, and historical resources in the State of California. Resources can be listed in the California Register through a number of methods. State Historical Landmarks and National Register-listed properties are automatically listed in the California Register. Properties can also be nominated to the California Register by local governments, private organizations, or citizens. The evaluative criteria used by the California Register for determining eligibility are closely based on those developed by the National Park Service for the National Register of Historic Places.

The subject property is not currently listed on the California Register.

California Historical Resource Status Codes

Properties listed or under review by the State of California Office of Historic Preservation are listed within the Built Environment Resource Directory (BERD) and are assigned a California Historical Resource Status Code (Status Code) of "1" to "7" to establish their historical significance in relation to the National Register of Historic Places (National Register) or California Register of Historical Resources (California Register).¹ Properties with a Status Code of "1" or "2" are either eligible for listing in the California Register or the National Register, or are already listed in one or both of the registers. Properties assigned Status Codes of "3" or "4" appear to be eligible for listing in either register, but normally require more research to support this rating. Properties assigned a Status Code of "5" have typically been determined to be locally significant or to have contextual

¹ California State Office of Historic Preservation, Built Environment Resource Directory (BERD), Santa Clara County, updated March 2020.

importance. Properties with a Status Code of “6” are not eligible for listing in either register. Finally, a Status Code of “7” means that the resource has not been evaluated for the National Register or the California Register, or needs reevaluation.

The subject property is listed in the BERD database for Santa Clara County with a status code of “7N1,” assigned during the 1990 survey that led to the establishment of the Los Altos Historic Resource Inventory in 1997.² A 7N1 status code means that the property “Needs to be reevaluated (former status code 4) - may become NR eligible with restoration or other specific conditions.”³ The most recent update to the BERD database was in March 2020.

City of Los Altos Historic Resource Inventory (HRI)

The City of Los Altos maintains a Historic Resource Inventory (HRI) that serves as an official list of Historic Resources, designated Historic Landmarks, and designated historic district contributors. For the City of Los Altos, a Historic Resource is defined as “a property or structure that has been determined to be over 50 years old, retains its physical integrity, has historical, architectural, cultural, and/or aesthetic value, and is listed on the HRI.”⁴ A City of Los Altos Historic Landmark is a Historic Resource that has a higher level of significance (i.e. an outstanding example of design or construction, the first, last or only example of its type, or the location of a highly significant event of local, statewide, or national significance).⁵ While the definition of Historic Resources is limited to buildings or structures, Historic Landmarks can also include improvements, natural features, and sites or areas of land, under single or common ownership.⁶

When the Los Altos HRI was first established in 1997, the HRI used the Kalman Scale, a “numerical evaluation system derived from *The Evaluation of Historic Buildings* by Harold Kalman,” to quantitatively analyze and rank the significance of potential historic resources.⁷ Los Altos used the Kalman scale through 2010.⁸

² While the BERD database does not supply the date of the survey, however, it appears to have been the 1990s Los Altos architectural survey due to the information included in the individual building records in the database. The Department of Parks and Recreation Primary Record form (DPR 523A form) and Department of Parks and Recreation Building, Structure, and Object forms (DPR 523B form) completed in 1997 for the HRI stated that the building is a good example of the Spanish Colonial Revival style, but did not provide a status code for the property.

³ For the status code assigned to the Halsey House refer to: California State Office of Historic Preservation, Built Environment Resource Directory (BERD), Santa Clara County, updated March 2020; for the meaning of a 7N1 status code, refer to: California State Office of Historic Preservation, “California Historical Resource Status Codes,” updated March 2020, 3.

⁴ CIRCA: Historic Property Development, *City of Los Altos Historic Resource Inventory*, (October 2012), I-4.

⁵ Ibid., I-14.

⁶ Ibid.

⁷ Adaptations of the method used by Kalman was a common evaluation approach widely used in the late 1970s, prior to the establishment and standardized use of the National Register and California Register criteria for the evaluation of potential historic resources. Ibid., I-2.

⁸ Ibid., I-5.

In 2012, the HRI was revised and the criteria for evaluation were aligned with the existing evaluation criteria for both the National Register and California Register. Today, a historic resource for the City of Los Altos is determined through establishing that it meets the age threshold of fifty years, retains its physical integrity, and meets one or more of the criteria for historic significance.⁹

The Halsey House and the larger property of Redwood Grove was listed as a City of Los Altos Historic Landmark in May 1981 and was listed as a Historic Landmark in the HRI when it was established in 1997. During a 1990 historic property survey of Los Altos' historic resources, the Halsey House was analyzed with the Kalman Scale and was given a rating of 95 out of 100 points.

Updated Department of Parks and Recreation Primary Record form (DPR 523A form) and Department of Parks and Recreation Building, Structure, and Object forms (DPR 523B form) were completed for the Halsey House in July 2011 as part of the effort to update the HRI. These DPR forms state that the Halsey House was significant for its association with the Halsey family as an important early Los Altos family and as a fine example of the Spanish Eclectic style.¹⁰ The building was also identified as a possible contributor to a proposed University/Orange Historic District. The Halsey House was given an updated Kalman Scale score of 73 and assigned the California Resources Historical Resources Status Codes of 5S1 and 5D2.¹¹ These status codes mean that the resource is "Individually listed or designated locally" and a "contributor to a multi-component resource that is eligible for local listing or designation," respectively.¹² While the 2011 DPR forms were completed for the building and not the larger property, despite their listing as a single Historic Landmark, the evaluation included mention of the Redwood Grove as "a notable natural landmark within the City of Los Altos."¹³

As noted in the section above (refer to **Existing Historic Status: California Historical Resource Status Codes**), the building currently has a status code of 7N1 in the BERD database that appears to date from the 1990 architectural survey. It appears that the 5S1 and 5D2 status codes from the 2011 HRI update were never submitted to the Northwest Information Center to be recorded in the BERD database.

⁹ Ibid., I-11 to I-14.

¹⁰ Circa: Historic Property Development. "Halsey House (Redwood Grove Park). State of California DPR 523A and 523B forms. Completed March 2009.

¹¹ Although an updated Kalman Scale score was listed on the 2011 DPR forms, the breakdown of the numbers assigned within each category was not included and staff at the City of Los Altos were unable to locate this revised Kalman Score analysis at this time.

¹² California State Office of Historic Preservation, "California Historical Resource Status Codes," updated March 2020, 2.

¹³ Circa: Historic Property Development. "Halsey House (Redwood Grove Park). State of California DPR 523A and 523B forms. Completed March 2009, 3.

III. ARCHITECTURAL DESCRIPTION

The Halsey House is currently vacant and has been boarded up and encircled by chain link fencing. The following description is based on a site visit that included access to the interior of the building to investigate existing windows and doors, a partial tour of the exterior of the building's perimeter wall within the chain-link fencing, as accessible, a view of the rear courtyard from over the south courtyard wall, and a walk of the perimeter of the building outside the chain-link fencing. Historic photographs from the Los Altos History Museum, various plans of the building provided by the City of Los Altos, information included in the 2019 Historic Structure Report by ARG, and photographs from 2003 and circa 2009 that were supplied by the City of Los Altos, were used to verify the building's design and the presence of features that are not currently visible from the exterior.



Figure 2: Bird's-eye view of the Halsey House. Source: Google Maps, 2021.

The Halsey House is a one-story stucco-clad building with a clay tile hipped roof (**Figure 2**). The building is generally U-shaped and is arranged around a rear courtyard with a courtyard wall that spans the south ends of the east and west wings. Extant original windows consist of a variety of multi-lite wood windows that include asymmetrically divided three-over-one double-hung sash, six-lite casement windows, small four-lite casement windows, some one-over-one double-hung windows, and two pairs of six-lite slider windows (one set of which is now missing). The asymmetrically divided three-over-one double-hung sash are the primary window type of the residence and will be referred to as "typical double-hung windows" throughout this report. Non-historic windows consist of a jalousie window and some fixed single-lite windows. Some of the

existing one-over-one double-hung sash are windows that replaced original three-over-one windows. The building also retains a number of original wood-frame doors that include paired ten-lite fully glazed French doors, which will be referred to as “typical French doors” within this report. These typical French doors are often paired with multi-lite sidelights in either a five-lite or ten-lite configuration.

Primary (North) Façade

The primary façade consists of an entrance porch at the east corner with north- and east-facing walls, the main length of the building along its north side, and the north- and east-facing walls of the 1928-addition located at the west corner of the north façade (**Figure 3**).¹⁴



Figure 3: Primary (north) façade of the Halsey House, largely hidden by chain-link fencing. Looking slightly southeast.

The entrance porch at the northeast corner of the building is reached via low concrete steps that are tinted a warm red color and rise to a concrete landing that is square in shape. Within the north-facing wall of the entrance porch are typical French doors with 10-lite sidelights (**Figure 4**). The east-facing wall contains the primary entrance to the residence that consists of a 15-lite fully glazed, single-leaf door with five-lite sidelights. This entrance door and surround retains its historic hardware including a doorknob, door lock, and doorbell. An original metal wall-mounted lamp is located to the south (left) of the entrance surround, and a small four-lite casement window is located at the south edge of the east-facing wall. A historic wood pergola is located over the

¹⁴ The Halsey House is oriented west of true north, but this report refers to the primary façade as facing north, the rear façade as facing south, etc. In actuality, the entrance porch is aligned to true north.

entrance porch and features decorative profiled ends (**Figure 5**). Non-historic corrugated plastic is located over the pergola to serve as a roof.



Figure 4: Entrance porch at northeast corner of building. Looking southwest.



Figure 5: Wood pergola and plastic roof over entrance porch at north façade. Looking southwest.



Figure 6: Interior view of French doors that open to north patio along north façade. Looking slightly northwest.

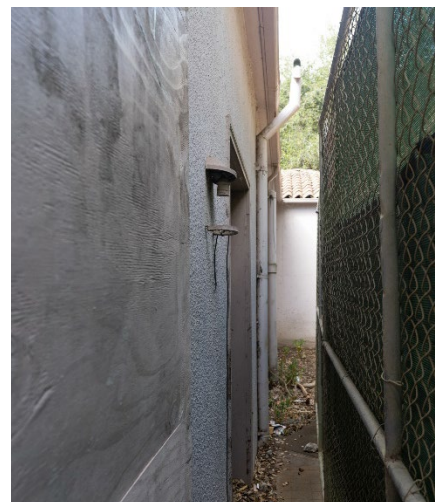


Figure 7: Extant original wall-mounted lamp between French doors at north façade. Looking slightly southwest.

The main length of the north façade features three evenly spaced typical French doors without sidelights that open onto the concrete north patio (**Figure 6**). Two original wall-mounted lamps (missing their glass covers) are located to either side of the center pair of French doors (**Figure 7**). Two sets of three windows are located along the west (right) portion of the façade. The east (left) set of three windows consists of replacement windows with fixed glass flanking a center jalousie window, while the west (right) window arrangement consists of three historic six-lite windows that were installed during the erection of the 1928 addition (**Figure 8**).

The east facing wall of the 1928 addition has a secondary entrance with a non-historic single-leaf wood replacement door reached by three tinted concrete steps that match the north patio (**Figure 9**). The north-facing wall of the addition features three typical double-hung windows.



Figure 8: Interior view of jalousie and fixed windows along primary façade. Looking northeast.



Figure 9: Secondary entrance to 1928 addition at west end of primary façade. Looking northwest.

East Façade

The east façade features several window types and one set of doors. From left to right (south to north), openings consist of paired six-lite slider windows, typical French doors, one typical double-hung window, two smaller replacement one-over-one double-hung windows (note, Figure 10 shows the original three-over-one windows at this location in 2003), two typical double-hung windows, and a group of four typical double-hung windows (**Figure 10**).



Figure 10: East façade of Halsey House in 2003. Source: City of Los Altos.

West Façade

The west façade contains the west- and south-facing walls of the 1928 northwest addition and the west-facing wall of the original portion of the residence (**Figure 11 and Figure 12**). Along the west-facing wall of the addition, the building features a brick exterior chimney that is centered on the wall and two paired typical double-hung windows to the north (left) of the chimney. The south-facing wall of the addition consists of a single typical double-hung window at its west (left) side, a wood infilled window opening with a wood frame, and a rectilinear horizontal fixed window.



Figure 11: South-facing wall of 1928 addition. Looking north. Source: *Halsey House HSR* by ARG, taken in May 2019.



Figure 12: West façade of original section of residence. Looking slightly southeast. Source: *Halsey House HSR* by ARG, taken in May 2019.

The length of the original section of the building features a number of openings, including one door. From left to right (north to south), these openings consist of a group of three typical double-hung windows, one typical double-hung window, a single-leaf partially glazed wood panel door, a group of three typical double-hung windows, one small four-lite casement window, one typical double-hung window, and two typical double-hung windows.

Rear (South) Façade

The south façade of the Halsey House features the south-facing walls of the east and west wings of the building and the rear wall of the courtyard that spans these two wings (**Figure 13**). The south facade of the west wing contains a group of three typical double-hung windows centered along this wall (**Figure 14**). The south wall of the courtyard consists of a tall stucco-clad wall that features one round-arched opening with a wood plank door that is located near the east wing. Along the exterior of this courtyard gate are three semi-circular stone steps that descend to the height of the rear

courtyard, which is slightly below the grade of the property to the rear (**Figure 15**). The south façade of the east wing features an asymmetrically placed opening that originally featured paired six-lite sliding windows that have since been removed due to damage.



Figure 13: South façade with rear courtyard wall. Looking slightly northwest. Source: HSR by ARG, taken in May 2019.



Figure 14: Interior view of three grouped typical double-hung windows along south façade of west wing. Looking southeast.



Figure 15: Semi-circular steps to gate in south façade of courtyard wall. Looking down and slightly northwest.

Rear Courtyard

The rear courtyard is surrounded by the residence on three sides (north, east, and west) and is enclosed along its south side by a stucco-clad wall with a round-arched gate (refer to description of the **Rear (South) Façade**, above).



Figure 16: View of rear courtyard, looking north. Red dashed outline shows original patio. Yellow dashed outline shows area of concrete infill.



Figure 17: View of original stone paving, fountain, and seating. Looking down and west from top of courtyard wall.

The courtyard features a tinted cement patio at its north end that matches the design of the north patio. The center portion of the courtyard has been infilled with concrete with small planting areas along both the east and west sides (**Figure 16**). The south portion of the courtyard retains its original stone and concrete paving with low steps and lined planting beds. A small fountain is attached to the south courtyard wall and is flanked by two curved buttresses that are designed to double as benches (**Figure 17**).



Figure 18: West side of courtyard (east-facing wall), looking northwest.



Figure 19: North and east sides of rear courtyard (south- and west-facing wall). Looking north over rear courtyard wall.

Along the west side of the courtyard, the east-facing wall of the Halsey House features, from south to north (left to right): one typical double-hung window, one ten-lite single-leaf fully glazed door that opens onto a small concrete landing with three steps and a metal railing, two small four-lite casement windows, three separate typical double-hung windows, and a pair of typical French doors that open to a small non-historic concrete landing with three steps (**Figure 18**).

Along the north side of the courtyard, the south-facing wall of the Halsey House features a centered exterior chimney that is clad in stucco to match the finish of the residence (**Figure 19**). Two typical French doors with five-lite sidelights are located to either side of the chimney.

Along the east side of the courtyard, the west-facing wall of the Halsey House features, from north to south (left to right): two sets of typical French doors, paired typical double-hung windows, paired one-over-one double-hung windows, one slightly shorter three-over-one double-hung window, and one one-over-one double-hung window (**Figure 19**).

Site

The Halsey House is located to the south of Adobe Creek and is reached via an access road along the south side of University Avenue (**Figure 20**). The surrounding property of Redwood Grove Park is marked by mature trees primarily consisting of redwoods and oaks.



Figure 20: Access road at south side of University Avenue. Looking east into the Redwood Grove.



Figure 21: Caretaker's cottage within Redwood Grove Park. Looking northeast.

The only other building on the property is the caretaker's cottage that is located to the northeast of the Halsey House near the access road from University Avenue (**Figure 21**). A wood flagpole, which appears historic but was installed at an unknown date, is located to the east of the Halsey House (**Figure 22**). Contemporary benches, picnic tables, trash cans, signage, and non-historic concrete paving have been installed since the property became a city park (**Figure 23**). A non-historic wood bridge was installed recently over Adobe Creek.



Figure 22: Wood flagpole to the east of Halsey House. Looking south.



Figure 23: Looking south within Redwood Grove Park. Caretaker's cottage at right; non-historic paving and signage visible.

IV. HISTORIC CONTEXT

Brief History of Los Altos

Prior to European settlement of the Santa Clara Valley, the area of modern Los Altos was inhabited by the Ohlone peoples. As many as 40 permanent villages rimmed the San Francisco Bay, and remnants of an Ohlone village and burial ground have been found in Los Altos through archeological investigation.¹⁵

European settlement of the Santa Clara Valley began with the establishment of the Franciscan Mission of Santa Clara de Asís in 1777. Spanish colonizers and Franciscan friars established Mission Santa Clara and 20 other California missions to convert local indigenous peoples to Catholicism, expand the Spanish colonial sphere of influence, and establish a colonial society through the mission system. While the system claimed to be based on the voluntary conversion of neophytes, large numbers of Native Americans were forcibly relocated to support the missions, devastating cultural continuity for many communities, and decimating indigenous populations through exposure to disease.¹⁶ Following the Secularization Act of 1833, the missions and the Franciscan order were stripped of their extensive land holdings throughout the state, and the land was awarded by the Mexican government to a number of individuals as rewards for their political or military service, or as personal favors. Two of these land grants, Rancho La Purisima Concepcion and Rancho San Antonio, later became part of the Fremont Township within Santa Clara County in 1851 and include the area of modern Los Altos.¹⁷

The following brief history of Los Altos' early ranching, orchard, and residential development is excerpted from the Historic Context within the *City of Los Altos Historic Resource Inventory* as revised in April 2011:

In the early rancho days, much of the Santa Clara Valley was used for cattle grazing. This activity later gave way to wheat and grain fields in the 1860s and 1870s. Mountain View was the principal settlement in the area and grew primarily as a result of the old Mountain View Station, a stage stop located along the San Francisco-San Jose Stage Road. This route today is known as El Camino Real.

¹⁵ The brief development history of Los Altos has largely been summarized from the following source: Circa: Historic Property Development, *City of Los Altos Historic Resources Inventory Report*, completed for the City of Los Altos, April 2011.

¹⁶ Robert Archibald, "Indian Labor at the California Missions," *The Journal of San Diego History*, Spring 1978, v. 24, no. 2, accessed July 2021, <https://sandiegohistory.org/journal/1978/april/labor/>; Charles Wollenberg, *Golden Gate Metropolis: Perspectives on Bay Area History* (Berkeley, California: Institute of Governmental Studies, University of California, Berkeley, 1985), 44-48.

¹⁷ Shirley Eastman, "History of the Los Altos Area" in *Memories of Los Altos*, ed. Joe Salameda (Los Altos: Los Altos Historical Society, 1982).

When the Southern Pacific railroad came through in 1864, the line was located about a mile from Mountain View Station, bypassing what was known as Old Mountain View (near present day Calderon). The "New Mountain View" was officially laid out in 1865 at the present downtown area along Castro Street. Settlement in and around Los Altos area grew as a result of the railroad and Mountain View was the center for all business activity for these early residents. [...]

Many believe that the real beginning of Los Altos start[ed] with the Altos Land Company and acquisition of Sarah Winchester's 100 acres in 1906. This land became what is known today as the downtown triangle.

The earliest account, date[d] August 2, 1906, was found in the *Palo Alto Times* in an article describing the purchase of the 100 acres mentioned above by the Interurban Electrical Railway for a right-of-way. It mentioned the creation of a new town-site to be called "Banks and Braes." Just when the name was changed to Los Altos is unknown, but we do know that the Altos Land Company and the University Land Company were formed in 1907. An October 2, 1913 issue of the *Mayfield News*, however, describes the townsite as being sold again and placed solely into the hands of Paul Shoup and George Herbert, a San Jose fruit packer. The deal is described as one of the most important real estate transactions in Santa Clara County.

With the establishment of the town in 1907 came the beginnings of subdivisions (although a few earlier subdivisions were recorded prior to 1907). [...]

The original town contains the University Avenue neighborhood. This early and very elite neighborhood contains a variety of architectural house types which are unified mainly by the street layout and alleyways. The lot sizes and scales of these homes vary in size greatly; yet there is a continuity of form in the streetscape in most cases. Dates in this area range from 1908 to the 1930s and buildings in many cases are probably architect-designed judging from the styles found, and the social status of people who occupied these buildings. Many of the homes in the district began as summer homes for prominent San Francisco businessmen and their families while others remained year-round living quarters for businessmen who commuted on the train.

[...] By 1911, according to Eastman's history of the town, Los Altos had only fifty homes; by 1913, only thirty-two telephones had been connected. The majority of

properties in the residential context are homes built in the 1920s and 30s, reflecting the growth of the area.¹⁸

Although the residential areas of Los Altos continued to grow, particularly as the automobile provided more independent travel options between the towns and rural areas of the Peninsula and the surrounding cities of the Bay Area, the area of Los Altos remained home to a flourishing orchard industry until the post-World War II period. After the war, due to the extreme demand for housing, land became more valuable for development than farming and many of the orchards were closed, sold, and subdivided for residential development. As described by the City of Los Altos in a brief history:

The town's name gradually spread informally to identify a much larger unincorporated area served by the Los Altos School District formed in 1910, including what is today Los Altos Hills and portions of other neighboring towns.

This larger community's population exploded after World War II, and on December 1, 1952, an expanded Los Altos became the eleventh city in Santa Clara County. As a result of decreased interest in train travel due to the wide adoption of the automobile, the Southern Pacific Railroad, an essential part of the town's founding, ceased operation here in 1964, and its right-of-way became Foothill Expressway.¹⁹

¹⁸ Circa: Historic Property Development, *City of Los Altos Historic Resources Inventory Report*, completed for the City of Los Altos, April 2011, II-4 to II-8.

¹⁹ "History of Los Altos," *City of Los Altos*, Accessed July 2021, <https://www.losaltosca.gov/community/page/history-los-altos>

V. SITE HISTORY

Site Development

Prior to the construction of the Halsey House in 1923, the approximately six acres of land of the future Redwood Grove was the site of a two-bedroom summer cottage owned by William H. and Myra E. Wright, the parents of Emma Wright Halsey. The location, according to Halsey family lore, was found by Emma for her parents, who were looking for a summer get-away along the Peninsula. The Wrights purchased the property in 1912 and constructed a summer cottage, to be used seasonally as “a place in the sunshine” to escape the summer fog of San Francisco.

When Emma Wright married Theodore Vail Halsey in 1915, their marriage took place on the grounds of the Wrights’ summer retreat, and the property was given to the newlyweds as a wedding present.²⁰ The Halseys initially continued to use the Los Altos property seasonally while living in San Francisco, but in 1923 they decided to live in Los Altos permanently and had the existing summer cottage demolished and the Halsey House constructed.

Construction Chronology of the Halsey House

The Halsey House was constructed in 1923 by an unidentified architect or builder. The 1926 fire insurance map by the Sanborn Map Company is the first map to show the original footprint of the residence. As constructed, the residence was U-shaped with the east wing slightly shorter in length than the west wing; the extant northwest addition that was constructed in 1928 for Myra Wright was not yet present (**Figure 24**). Early Halsey family photographs show the north façade of the residence prior to the construction of the addition and confirm that the north façade originally included the three pairs of French doors and three eight-lite casement windows (now replaced with a jalousie window and two fixed windows) (**Figure 25**).

²⁰ “Eugenia Halsey Buss Interview, August 23, 2001,” transcribed interview of Eugenia Halsey Buss (and Robert Buss) by Don McDonald, Los Altos History Museum, Oral History Program.

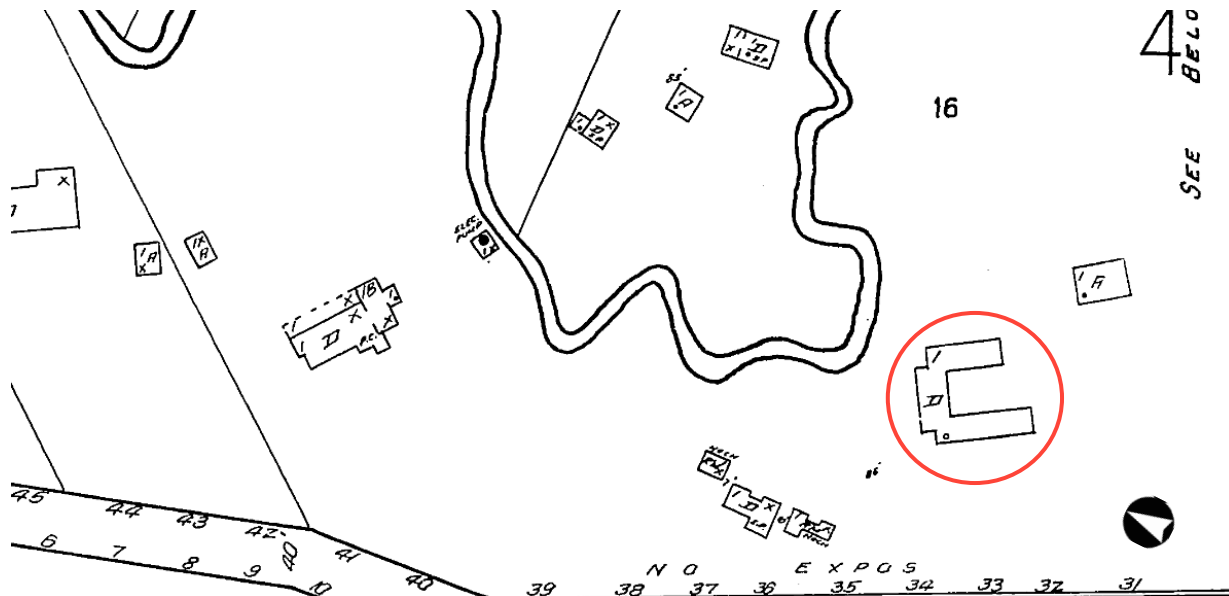


Figure 24: Sanborn Map Company fire insurance map from 1926 showing the subject building's original footprint, circled in red. Source: San Francisco Public Library. Edited by Page & Turnbull.

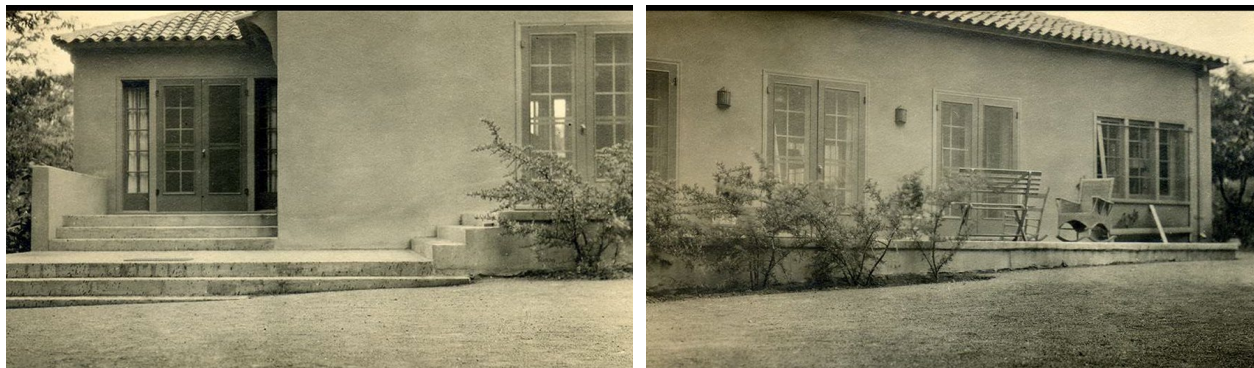


Figure 25: Two photographs of the Halsey House prior to 1928, showing the original full length of the primary (north) façade which ended just west of the three grouped eight-lite casement windows. Source: Los Altos History Museum Collections, courtesy of Katherine Halsey Buss.

In 1928, the northwest addition was constructed to provide a separate apartment with a separate entrance for Emma's mother, Myra Wright.

At some time in the 1930s, an addition was made to the east wing, extending it to be equal in length to the west wing. Early photographs of the rear courtyard show the shorter east wing and the original location of the courtyard gate in the east wall of the courtyard, prior to its relocation to the south wall of the courtyard (**Figure 26 and Figure 27**). The extension of the east wing added an additional bedroom and bathroom to the residence that were used to house a live-in servant,

variously a maid or a cook.²¹ While none of the available photographs of the Halsey House during the Halseys' residency show this addition as completed, it is mentioned within the oral history with Eugenia Buss and in other communications with Halsey descendants.



Figure 26: Historic photograph of the courtyard in the late 1920s or early 1930s, showing the original configuration of the east wing and the courtyard wall. The red dashed line indicates the original end of the east wing prior to the construction of an addition at an unknown date likely in the 1930s. Today the round-arched courtyard door is located in the south wall, just left of the bench in this photograph. Source: Los Altos History Museum Collections. Edited by Page & Turnbull.

One other alteration known to have been completed during the ownership of the Halsey family is the construction of the wood pergola structure over the entrance porch at the east end of the primary façade. While the entrance porch originally featured a small shed roof over the primary entrance (visible in the left photograph at Figure 25), a photograph from the late 1930s or early 1940s shows the addition of a wood post at the northeast corner of the entrance porch that

²¹ Email communication between Katherine Buss and staff of ARG, May 30, 2019. Based on her memories of Halsey family history, Katherine Buss recalls that the family had a live-in cook.

indicates that the pergola was present at this time (**Figure 28**).²² The plastic corrugated roofing was added later and is not historic.



Figure 27: Emma Halsey, in the 1920s, at the open courtyard gate in its original location along the east courtyard wall. Looking east into the larger property. Source: Los Altos History Museum Collections.



Figure 28: Portrait of unidentified women, taken near the creek in front of Halsey House in the late 1930s or early 1940s. The entrance porch of Halsey House is just visible in the background at the far right. Source: Los Altos History Museum Collections. Courtesy of Katherine Halsey Buss.

Photographs of the Halsey House's courtyard in the 1920s through the 1940s illustrate the extensive planting of the courtyard completed by Emma Halsey with assistance from her two gardeners, Mori and Yoshio Hongo (**Figure 29**, **Figure 30**, and **Figure 31**). The courtyard retains its original tinted concrete patio at its north end and some of the original stone paving and lining of planting beds at its south end. The benches and a portion of the original fountain are extant along the south courtyard wall. The central circular planting bed and a freestanding fountain that was added during the Halseys' residency have been removed, and a concrete patio was installed in the center of the courtyard prior to 1983.²³

²² Date of the photograph is assumed to be the late 1930s to early 1940s based on the clothing of the women in the photograph.

²³ Photographs of planting within the courtyard and painting of the building's courtyard-facing facades in 1983 were provided by Marie Backs to the author.



Figure 29: Theodore and Emma Halsey within rear courtyard of Halsey House in the 1920s. Source: Los Altos History Museum Collections.



Figure 30: Photograph of the Halsey family and guests on the rear patio of the courtyard, in 1924. Looking north. Note the original balconette at the far left that is no longer extant. Source: Los Altos History Museum Collections.



Figure 31: Rear courtyard of Halsey House in the late 1930s or early 1940s, showing growth of the garden. Looking slightly northeast. Source: Los Altos History Museum Collections. Courtesy of Katherine Halsey Buss.

Alterations that have occurred since Emma Halsey sold the property in 1945 include alterations to the interior and exterior of the Halsey House, as well as changes to the larger property. At some time during the Busseys' ownership, the Halsey House was subdivided into two units and rented out. In 1970, when the property was purchased by Meredith Pearson, each wing of the Halsey House was a separate unit with its own kitchen, and the original living room along the north side of the building was a shared living area for both units.²⁴ A number of interior alterations had been made prior to 1970, including the installation of a second kitchen and the erection of non-historic partitions in the original living room, entrance hall, and the dining room.

Exterior alterations have been established through observation and a review of historic photographs. These alterations have not changed the existing footprint of the building and are largely limited to the replacement of doors and windows. These alterations include:

- Primary (north) façade:
 - Two fixed windows flanking a metal frame jalousie window were installed to replace three original eight-lite casement windows

²⁴ Phone conversation between Meredith (Pearson) Phillips and the author on July 22, 2021.

- Replacement wood frame single-leaf door were installed at the entrance to the 1928 addition
- East façade:
 - Two one-over-one double hung windows were installed to replace original three-over-one windows after 2003 (refer to Figure 10)
- West façade:
 - Single-leaf door was installed at original window location
 - Brick chimney at the west-facing wall of the northwest addition appears to have been reconstructed with contemporary brick
 - Along the south-facing wall of the northwest addition, one original window opening was infilled (frame and sill remain along exterior)
 - Along the south-facing wall of the northwest addition, the easternmost window was replaced with a fixed window
- Courtyard façades:
 - East-facing façade:
 - Original wrought-iron balconette outside French doors was removed and replaced with concrete steps and landing (refer to Figure 30, original balconette visible at far left of photograph)
- Within the courtyard:
 - A non-historic concrete patio was installed prior to 1983²⁵
 - The bowl of the fountain at the south courtyard wall was removed prior to 1983²⁶

Several non-original partitions are known to have been constructed within the Halsey House prior to 1970. When the City of Los Altos acquired the property in 1974, some non-historic partitions were removed, and others were installed. A comparison between floor plans of the Halsey House by city staff in 1978 show some of these interior changes (**Figure 32 and Figure 33**). The installation of the acoustic tile and drop ceilings in the original living room appear to have been undertaken after 1974.

²⁵ Photographs of planting within the courtyard and painting of the building's courtyard-facing facades in 1983 were provided by Marie Backs to the author.

²⁶ Ibid.

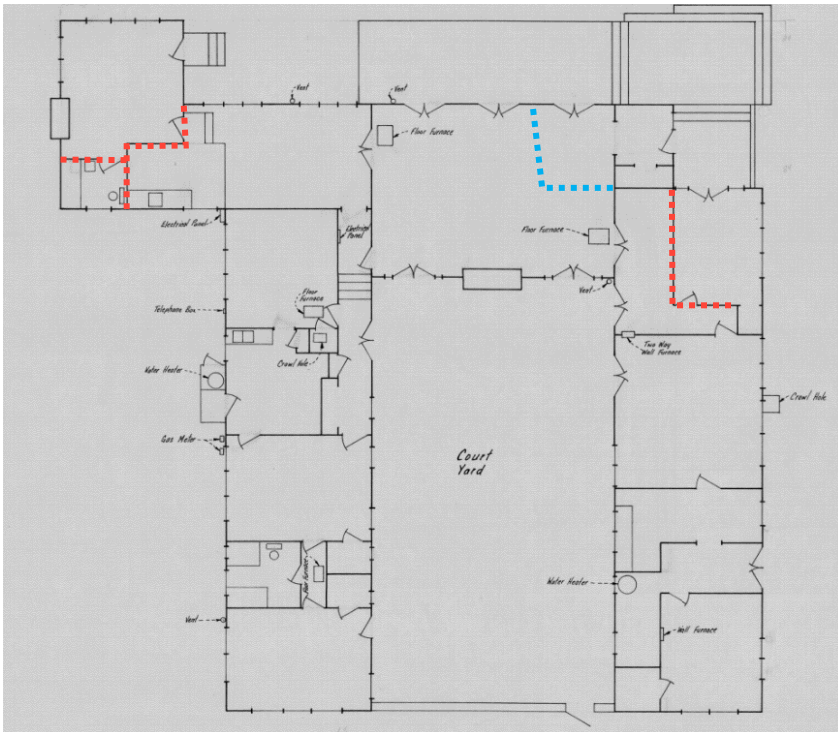


Figure 32: Floor plan of Halsey House circa 1974 through 1978, showing partitions in place at that time. Drawing dated April 1978. Blue dashed line shows additional non-historic partition wall that is known to have been removed between 1974 and 1978 by the City of Los Altos. Red dashed lines show walls that were removed circa 1978 (refer to Figure 33). Source: City of Los Altos.

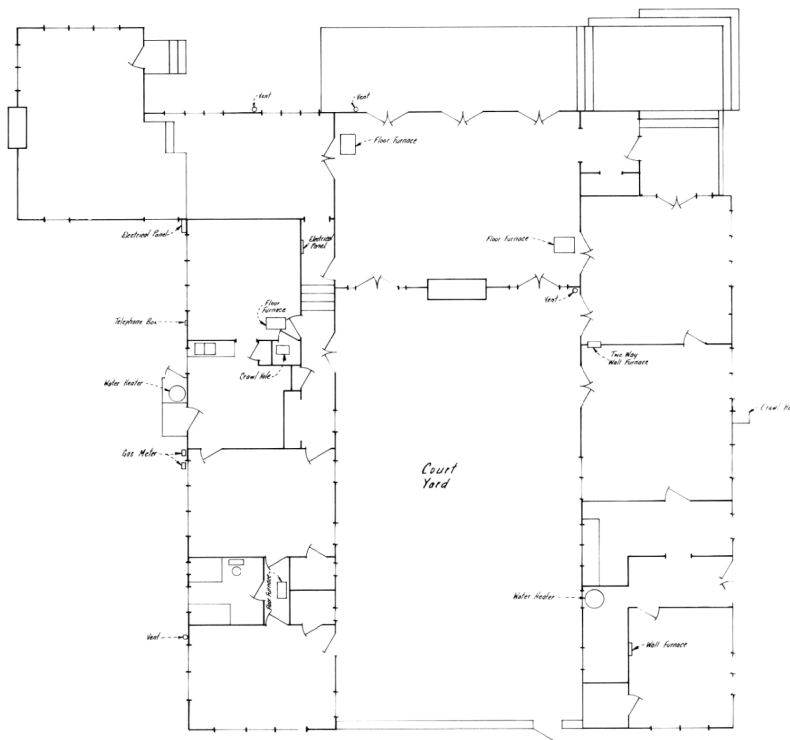


Figure 33: Floor plan of Halsey House, dated April 1978. Shows proposed floor plan after the removal of some partitions (refer to Figure 32). This floor plan is largely accurate to the current floor plan of the building with minor exceptions. Source: City of Los Altos.

Development of the Redwood Grove Landscape and Site

Along with the construction of the Halsey House, in the 1920s the property underwent significant change under the care of Emma Halsey and her gardeners, Mori and Yoshio “Frank” Hongo.²⁷ The eponymous redwoods of Redwood Grove were transplanted as saplings to the site by Emma and Mori from Emma’s paternal grandfather’s property along Summit Road in the Santa Cruz Mountains in the early 1920s.²⁸

The property was extensively landscaped through the planting of the redwoods, a variety of fruit trees – including apple, pear, apricot, cherry, almond, persimmon, and walnut trees – and the establishment of gardens that included ferns, azaleas, camellias, roses, irises, lavender, wisteria, and rhododendrons.²⁹ Many of the flowering plants were located either within the rear courtyard or near the Halsey House, while the larger property remained wooded. The areas directly south and west of the house were planted with fruit trees to create a small orchard (**Figure 34**).



Figure 34: View of the west façade of the residence showing the small orchard at this location, circa 1924. Looking east. Source: Los Altos History Museum Collections.



Figure 35: Undated photograph showing one of the small wood bridges that crossed the creek. Source: Los Altos History Museum Collections.

²⁷ Mori is called “Omori” in the oral history with Eugenia Halsey Buss from 2001 but is listed as M. Mori in census records. For the purposes of consistency within this report “Mori” will be used.

²⁸ “Eugenia Halsey Buss Interview, August 23, 2001,” Los Altos History Museum, Oral History Program, 2.

²⁹ Ibid, 4.; Helen Buss Halsey, “Map of the Garden and House,” provided to staff at ARG via email from Katherine Buss, May 2019.

Other improvements that were made during the Halseys' residence include the construction of a few small wood bridges that crossed over Adobe Creek, which winds through the property, as well as the construction of benches, the lining of planting areas with stone borders, and the construction of a croquet court that was converted into a fenced tennis court at an unknown date (Figure 35).³⁰

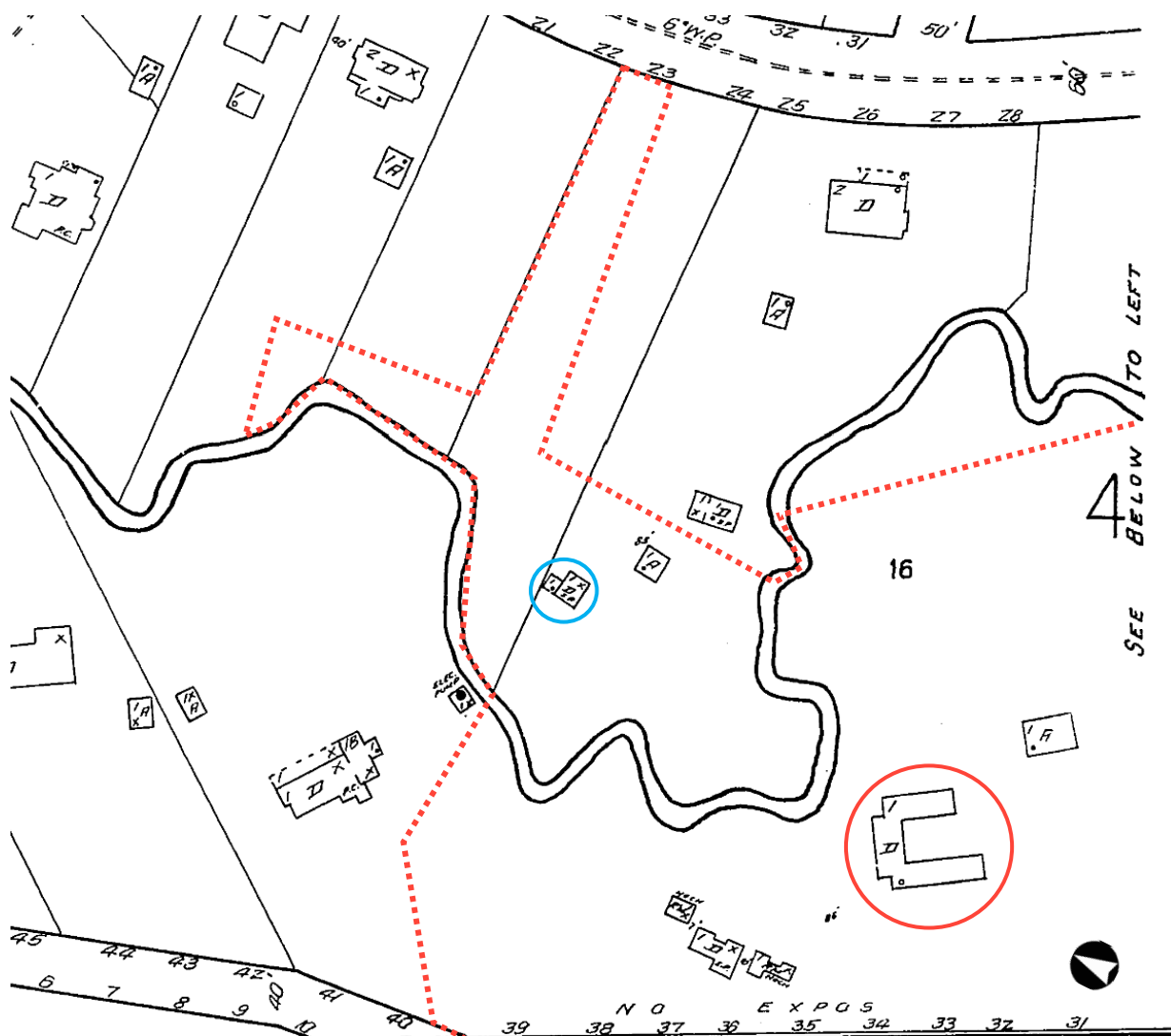


Figure 36: Sanborn Map Company fire insurance map from 1926 showing the approximate boundary of the Halsey property based on the modern property line and the shape of Adobe Creek, shown with a dashed red line. The property continues to the south and west of the area shown. The Halsey House is circled in red. Source: San Francisco Public Library. Edited by Page & Turnbull.

³⁰ "Eugenia Halsey Buss Interview, August 23, 2001," Los Altos History Museum, Oral History Program, 4.

Historic photographs of the property show a wood-frame garage building that may have been the automobile garage (no longer extant) located slightly southeast of the residence on the Sanborn Map Company map of 1926 and 1932. The other buildings shown on the 1926 map include the caretaker's cottage (extant though altered), a small dwelling to the west of the Halsey House that may have been used as a cottage for guests (no longer extant), two small buildings with an unidentified use (no longer extant), and an additional garage building (no longer extant) located near the caretaker's cottage (**Figure 36**).³¹

The caretaker's cottage survives today but has been altered through at least two additions, the replacement of its windows and doors, and other alterations to its original design. An evaluation of the caretaker's cottage is outside the scope of this report.



Figure 37: 1963 aerial photograph. Red circle shows location of Halsey House; blue circle shows the location of the extant caretaker's cottage; yellow dashed line shows the access road from University Avenue. Flight: CAS-SCL, Frame: 5-37. Source: UC Santa Barbara, Frame Finder. Edited by Page & Turnbull.

Significant changes to the landscape occurred during the ownership of the Besseys from 1945 until 1970. The Besseys constructed between six and ten additional cottages on the property to meet the

³¹ Mention of the additional cottage is limited to an annotation on a map of the house and garden as drawn by Helen Buss Halsey. On this hand drawn map, a "small cottage where Aunt Carrie stayed" is marked as having been located west of the Halsey House. Helen Buss Halsey, "Map of the Garden and House," provided to staff at ARG via email from Katherine Buss, May 2019.; Due to the inaccuracy of distances in Sanborn maps and that the property line as shown has been approximated based on the modern property line and the shape of Adobe Creek, the second garage building may be improperly located on the map and associated with the residence located just north of the property line.

needs of the post-World War II housing shortage.³² Some of these structures are visible in a 1963 aerial photograph of the property (**Figure 37**).

At the time of Meredith Pearson's purchase of the Redwood Grove and Halsey House, these various cottages and buildings were extant. During the city's ownership of the property and as part of the Redwood Grove's conversion to a public park, the additional cottages constructed by Bessey were removed and only the Halsey House and the caretaker's cottage were retained.

Today, few of the original plantings by Emma Halsey, Mori, and Yoshio Hongo survive, with the exception of the redwood trees planted in the early 1920s. Some individual specimens of fruit trees, flowering trees, and other plants may survive, but the overall impact of the formal landscape has been obscured through the alterations to the property since 1945.

Ownership and Occupancy History

The following tables provide a summary of the ownership and occupancy history of the Halsey House beginning with the year of construction of the residence in 1923. This does not include the purchase of the property in 1912 by William and Myra Wright, or the transfer of ownership between the Wrights and the Halseys in 1915, which predate the construction of the Halsey House.

The owner and occupancy histories were compiled from newspaper articles, city directories, oral histories, and existing documentation for the Halsey House. The County of Santa Clara Office of the Assessor was closed to researchers at the time of this report, and a full history of the deeds of the property was not completed at this time.

Table 2. Owner History for the Halsey House		
Date(s)	Owner(s)	Occupation
1923-1943	Theodore Vail Halsey Emma Wright Halsey	Executive, SF Pacific Telephone & Telegraph Company Housewife
1943-1945	Emma Wright Halsey	
1945-1970	Edward C. Bessey ³³ Rachel M. S. Bessey	
1970-1974	Meredith Pearson	
1974-present	City of Los Altos	

³² "Eugenia Halsey Buss Interview, August 23, 2001," Los Altos History Museum, Oral History Program, 18.

³³ The Bessey family are named as the purchasers of the property in all written and oral histories of the Halsey House. Bessey appears to refer to Edward Cushing Bessey and his wife Rachel Miller Shaw Bessey. As the Assessor's office was closed at the time of this report, Page & Turnbull was unable to verify these names through the property's deed records.

Table 3. Occupant History for the Halsey House		
Date(s)	Occupant(s)	Occupation
1923-1928	Theodore Vail Halsey Emma Wright Halsey Myra Eugenia Halsey (later Buss) Theodore Vail Halsey, Jr. Mori ³⁴	Executive, SF Pacific Telephone & Telegraph Company Housewife Student Student Gardener
1928-1943	Theodore Vail Halsey Emma Wright Halsey Myra E. Halsey (1928-1939) ³⁵ Theodore Vail Halsey, Jr. Myra E. Wright Mori (1930) Katie Laetinen (1930) Vivian Peterson (1940)	Executive, telephone company (various) Housewife Student Student None Gardener Cook Maid
1943-1945	Emma Wright Halsey Myra E. Wright	None None
1945-1970	Unknown [various renters]	N/A
Summer 1970	Meredith Pearson [Pearson family and various renters] ³⁶	Unknown
1970-1974	[Pearson family and various renters] ³⁷	Unknown

Theodore and Emma Halsey received the property as a wedding gift in 1915 from Emma's parents. As described previously (refer to the section, **Site Development**, above), the property was used as a summer home by the Halseys and the Wrights prior to the construction of the Halsey House in 1923. In 1923, the Halseys moved to Los Altos permanently with their two children, Theodore Vail, Jr. and Myra Eugenia (who went by Eugenia as an adult).

³⁴ As stated previously, Mori is spelled "Omori" in the transcribed oral history with Eugenia Halsey Buss from 2001 but is listed as M. Mori in census records. For the purposes of consistency within this report "Mori" will be used. Exact dates of Mori's residence at Halsey House or on the larger property are unknown, but it is likely that he resided on the property from the early 1920s through the mid- to late-1930s.

³⁵ Myra Halsey married in 1939 and was not living at the Halsey House by 1940.

³⁶ Email correspondence between Meredith Phillips and Marie Backs, supplied to the author by Phillips on July 22, 2021.; Phone conversation between Meredith (Pearson) Phillips and the author on July 22, 2021. Other family members residing at the property during this period prefer to remain unnamed.

³⁷ Ibid.

The Halseys' gardener Mori, a Japanese immigrant who arrived in the United States in 1913, was also a resident on the property in the early 1920s through at least 1930.³⁸ Mori assisted Emma in the planting of the redwood saplings and the general landscaping of the Halsey property.

In 1928, the Halseys were joined by Emma's mother, Myra Wright, following the death of Emma's father. At the time of the 1930 Federal Census, both Mori and a maid, Katie Laetinen, were listed at the Halsey residence in addition to the Halseys and Myra Wright.³⁹ It is unclear whether Mori was residing in the caretaker's cottage, as suggested in the oral history, as neither Mori nor Katie Laetinen were listed under a separate dwelling number.⁴⁰

By the time of the 1940 Federal Census, Mori had left the United States to return to Japan and a new gardener, Yoshio (Frank) Hongo, had been hired to work with Emma at the Halsey property.⁴¹ According to the 2001 oral history with Eugenia Halsey Buss, Mori and Yoshio were well acquainted – Yoshio was a gardener at another Los Altos property – and Mori recommended Yoshio to be his replacement.⁴²

Yoshio and his wife, Takiyo, lived in the caretaker's cottage with their four children: Yuta, Fumiye, Kazuye, and Hisaye.⁴³ Yoshio immigrated from Japan in 1912 and returned to Japan to marry Takiyo in 1918.⁴⁴ Takiyo came to the United States in 1919. Their four children were born in California. In 1942, the Hongo family was sent to Heart Mountain Relocation Center in Wyoming due to the forced internment of Japanese Americans under Executive Order 9066, issued in February 1942.

In 1943, Theodore Halsey passed away. From 1943 until 1945, Emma Halsey and Myra Wright lived at the Halsey House until it was sold to the Bessey family in 1945.⁴⁵

³⁸ "Eugenia Halsey Buss Interview, August 23, 2001," Los Altos History Museum, Oral History Program, 1.; United States Federal Census, Santa Clara County, Fremont Township, Precinct 1, 1930.

³⁹ United States Federal Census, Santa Clara County, Fremont Township, Precinct 1, 1930.

⁴⁰ As neither was listed under a separate "dwelling number" within the census records, both have been included in the occupancy table above. The 2001 oral history implies that Mori resided in the caretaker's cottage, which was then "fixed up" for the Hongo family.

⁴¹ Yoshio Hongo went by Frank Hongo and is referred to as Frank within the Eugenia Halsey Buss oral history. "Eugenia Halsey Buss Interview, August 23, 2001," Los Altos History Museum, Oral History Program, 3-4.

⁴² Ibid.; United States Federal Census, Santa Clara County, Fremont Township, 1930. Yoshio was listed as a gardener in Los Altos in the 1930 census.

⁴³ "Eugenia Halsey Buss Interview, August 23, 2001," Los Altos History Museum, Oral History Program, 3-4.

⁴⁴ "Petition for Naturalization, Yoshio Hongo," July 1953, Accessed via Ancestry.com.

⁴⁵ Emma Halsey and Myra Wright moved to Palo Alto in 1945.

The Bessey family appears to refer to Edward C. Bessey and Rachel Miller Shaw Bessey.⁴⁶ The Besseys do not appear to have ever resided at the subject property and purchased it as a rental property and development opportunity. Prior to moving to the San Francisco Bay Area, the Besseys resided in San Diego, and Edward Bessey was employed as a pilot for the Trans Ocean airlines.⁴⁷ In 1949, Bessey force landed a passenger plane in the Atlantic Ocean just beyond the Shannon, Ireland Airport.⁴⁸ During the news coverage of this incident, including the subsequent libel suit brought by Bessey against the airline, Edward Bessey's address was listed variously as Westersfield, Connecticut and Los Altos, California. It appears that Bessey left the airline industry and became an automobile salesman in San Jose in the 1950s and transitioned into real estate by 1962.⁴⁹ The Besseys lived in San Jose, Palo Alto, Mountain View, Los Altos, and Los Altos Hills, but are not known to have ever resided at the Halsey House.

During the Besseys' ownership, the Halsey house was subdivided into two units and several cottages (numbering from six to ten) were constructed on the property in the postwar period and rented out. The identities of individuals who resided at the property during this period have not been identified.⁵⁰

In 1970, the property was purchased by Meredith Pearson (now Phillips), who briefly resided in the Halsey House during the summer of 1970. Pearson's intention for the property was both to save the Redwood Grove from possible development, which was proposed by a developer interested in the property, and to establish a property for communal living with family and friends.⁵¹ Pearson relocated to Palo Alto in late 1970, but during her ownership of the property, several family members and friends continued to reside at the Halsey House and rented the other buildings on the property.⁵² Pearson owned the property until it was sold to the City of Los Altos in 1974.

From 1974 until 2008, the Halsey House was open to the public for various public programs including as a small museum and an educational center. Since 2008, the building has been vacant

⁴⁶ "Rachel Miller Shaw Bessey," *Los Altos Town Crier*, February 8, 2012, Accessed July 27, 2021, https://www.losaltosonline.com/people/obituaries/rachel-miller-shaw-bessey/article_0f19701f-f092-59ac-b987-a91c08119d8c.html

⁴⁷ City Directories, San Diego and Coronado.; Arriving Passenger and Crew Lists, various, 1947-1949. Accessed via Ancestry.com.

⁴⁸ The plane had reportedly run out of gas due to a number of mistakes made by the navigator of the flight. "Atlantic Airliner Toll Drops to 8," *The Fresno Bee*, August 17, 1949.; "Air Lines Sued for \$200,000 by Pilot in Crash," *Oakland Tribune*, April 12, 1950.

⁴⁹ Various city directories from 1952 to 1968, including San Jose, Palo Alto, and Mountain View.

⁵⁰ City and county directories are unavailable for this period. Initial research was not able to establish the residents of either the cottages (all demolished) or the main house.

⁵¹ Email correspondence between Meredith Phillips and Marie Backs, supplied to the author by Phillips on July 22, 2021.

⁵² Phone conversation between Meredith (Pearson) Phillips and the author on July 22, 2021.

and closed to the public due to health and safety concerns. Today, the building is boarded up and encircled by fencing in an effort to keep out vandals.

SELECT OWNER AND OCCUPANT BIOGRAPHIES

Theodore Vail Halsey (1873–1943)

Theodore Vail Halsey was born in 1873 in Minnesota. His family moved to California in 1882 and resided in San Jose. Various family members of Theodore Halsey were involved in the development and implementation of the telephone and telegraph systems, and Halsey pursued a career in the telephone and telegraph industries.

For many years, Halsey was an executive of the Pacific Telephone and Telegraph Company of San Francisco and was charged with bribery in a large graft case against telephone company executives. After a series of guilty verdicts for other executives charged in the case, Halsey was acquitted and was widely believed by the press to have been used as a scapegoat by “higher-ups” in their attempt to escape prosecution.⁵³ The various court cases lasted from 1907 to 1912.

Halsey was an executive of the Telephone Investment Company and was also the first president of the Philippine Long Distance Telephone Company beginning in 1928. Halsey had been involved with introducing and developing the telephone system in the Philippines as early as 1906. Halsey did have a personal office/library within the residence (located in the original northwest corner of the building), however, Halsey family history does not indicate that he held important meetings or used this office to conduct significant business that related to his professional accomplishments.⁵⁴

In the 1930s, Halsey established Delta Properties Inc. to farm and improve tracts held in the area of the Sacramento–San Joaquin Delta. Halsey was later joined by his son, Theodore Halsey, Jr., in this business venture.

Halsey was married twice. His first marriage, circa 1900, was to Jessie L. Sabin (formerly Mrs. Stephen Fiddler), who passed away circa 1914.⁵⁵ In 1915, Theodore Halsey married Emma Wright in

⁵³ “Glass Must Stand Trial,” *Oroville Daily Register*, July 24, 1912.; “Theo. V. Halsey Will Wed Miss Emma Wright,” *The San Francisco Examiner*, June 16, 1915.

⁵⁴ This office/library appears to have been located where the original grouping of three eight-lite casement windows were located. After the construction of the 1928 addition, a hallway led from Myra Wright’s rooms through this office area to reach the living room. General location of Theodore’s office/library is shown on Helen Buss Halsey’s “Map of the Garden and House,” provided to staff at ARG via email from Katherine Buss, May 2019.; recollections of the hallway between the study and Myra’s rooms are related in an email from Katherine Buss to staff at ARG, May 30, 2019.

⁵⁵ “Theodore V. Halsey Weds [Emma] Minerva Wright,” *Oakland Tribune*, June 16, 1915.; United States Federal Census, San Francisco County, 1910.

Los Altos at the subject property. They had two children (refer to **Ownership and Occupancy History**, above).

Halsey appears to have suffered from poor health for many years. He was hospitalized and believed to be “on his death bed” during his 1907 trial and suffered a stroke in 1936.⁵⁶ Halsey passed away in 1943.

Emma Minerva Wright Halsey (1880–1975)

Emma Wright was born in 1880 to William H. and Myra E. (née Quinby) Wright. William Wright’s parents were considered California pioneers, who settled in California in 1869 and established a ranch along Summit Road in the Santa Cruz mountains.⁵⁷ William Wright was president of the San Jose Fruit Packing Company, and later worked as a contractor in the dredging business. Myra Wright was born to the Quinby family, for whom Quinby Road in San Jose is named, and worked as a schoolteacher prior to her marriage to William Wright.⁵⁸

The Wrights moved to San Francisco in 1900. In 1912, when Emma was in her early 30s, she found the future Halsey House property when her father asked her to locate a property along the Peninsula to serve as the Wrights’ summer home.

In 1915, Emma married Theodore Vail Halsey. No announcement was made of their engagement.⁵⁹ Emma was an avid gardener, and the choice to relocate to Los Altos in 1923, with their two young children, gave her the opportunity to garden extensively. As related by Halsey family descendants, the Halseys’ bedroom at Halsey House opened to the courtyard, and Emma was known to rise early and garden in the courtyard before other family members had risen.⁶⁰

Following Theodore Halsey’s death in 1943, and the forced internment of the Hongo family at Heart Mountain Relocation Center, Emma sold the Halsey House and property. She and her mother moved to Palo Alto. Emma is reported to have found the house and grounds too lonely and isolated for only herself and Myra.⁶¹ Emma Wright Halsey passed away in 1975 in Palo Alto.

⁵⁶ “Halsey’s Story is ‘Cooked Up,’” *The Fresno Morning Republican*, October 12, 1907.

⁵⁷ H.S. Foote, ed., *Pen Pictures From The Garden of the World or Santa Clara County, California. Illustrated.*, (Chicago: The Lewis Publishing Company, 1888), 302.

⁵⁸ “Mira [sic] Wright was a Pioneer Resident,” *Los Gatos Times-Saratoga Observer*, October 13, 1944.

⁵⁹ “Theodore V. Halsey Weds [Emma] Minerva Wright,” *Oakland Tribune*, June 16, 1915.

⁶⁰ Email correspondence between Katherine Buss and staff of ARG, May 2019.

⁶¹ “Eugenia Halsey Buss Interview, August 23, 2001,” Los Altos History Museum, Oral History Program.

The Design of the Halsey House

The Halsey House was designed in a modest Spanish Colonial Revival style in 1923 and was expanded with two early additions in 1928 and the 1930s.

Historically rooted in the building traditions of early Spanish and Mexican settlers of California and other Spanish colonies, the Spanish Colonial Revival style was popular in California and the rest of the Southwest from the early 1900s to the 1930s, with variations on the style remaining popular today. Earlier Hispanic Revival styles were rooted in regional interpretations of traditional Spanish, Native American, and Mexican design and construction techniques, which were indigenous to California. Not as ornate as its earlier Mexican prototypes, the Mission Revival style in the 1910s was characterized by low-pitched or flat roofs (often composed of thatch, terracotta tile or tar), thick masonry walls of adobe brick or stucco, multiple doorways, deeply recessed openings with multi-lite windows, arcades/colonnades, sculpted parapets resembling the typical *espadaña* (belfry), and red clay tile roofs. The Mission Revival style was popular in California and much of the Southwest because it was derived from indigenous prototypes.

By the 1920s, the Mission Revival style in California was joined by the more elaborate Mediterranean and Spanish Colonial Revival styles. Making use of terracotta tile gable roofs, thick masonry walls, plaster finishes, wrought iron grilles, balconies, and smaller fenestration openings, the Spanish Colonial Revival style was popular for commercial buildings, institutions, apartments, and single-family residences. In California, the Spanish Colonial Revival style came into prominence after the Panama-California Exposition in San Diego in 1915 and remained popular into the 1930s, when the Great Depression, and then World War II, had a chilling effect on construction.⁶²

The Halsey House illustrates some of the common features of the Spanish Colonial Revival style through its material palette of clay tile roofing, lightly colored stucco cladding, and multi-lite windows and doors with wood sash, but lacks the decorative detailing that is common to the high-style examples of the Spanish Colonial Revival style. Decorative detailing that is typical of the style generally includes the integration of stucco grilles, the presence of metal features including lamps, window grilles, and balcony railings, an emphasis around primary entrances through the presence of carved wood doors, spiraled columns, carved stonework, or decorative tiles, and the use of unpainted wood elements.⁶³ As originally designed, the Halsey House incorporated one balconette along the inner courtyard (since removed) and several simple metal lamps that are partially extant.

⁶² San Francisco Planning Department, *San Francisco Preservation Bulletin No. 18 – Residential and Commercial Architectural Periods and Styles in San Francisco* (January 2003).

⁶³ Virginia Savage McAlester, *A Field Guide to American Houses*, Second Edition (New York: Knopf, 2018), 520-534.

Other decorative elements were limited to the inclusion of the fountain along the south wall of the rear courtyard.

The integration of interior and exterior spaces, as seen at Halsey House through the use of French doors and courtyards, is an element of the Spanish Colonial Revival style but also demonstrates a regional preference for taking advantage of California's temperate climate. The open design of the Halsey House's living spaces, emphasizing the relationship of the landscape and the outdoors with the interior, is a vernacular interpretation of the style that was likely a particular request of the Halseys during the design of the building.



Figure 38: Example of the Spanish Colonial Revival style in Los Altos at 10 Pasa Robles Avenue. Source: Redfin.com.



Figure 39: St. Nicholas Church in Los Altos, an example of the Spanish Colonial Revival style. Source: St. Nicholas Church.

Overall, the Halsey House has a cohesive design that is unified through its limited material palette and its use of numerous multi-lite windows and doors that intimately relate the building to its site. However, the building is not a high-style example of the Spanish Colonial Revival style. An extensive comparative survey of other local examples of the Spanish Colonial Revival style was not undertaken for this report, but a brief review of the other properties included in the Los Altos HRI identified several other Spanish Colonial Revival style buildings in Los Altos, including six residential properties, two religious properties, and one commercial property (**Figure 38 and Figure 39**).⁶⁴ Of these nine additional properties that are local examples of the Spanish Colonial Revival style, two

⁶⁴ The other properties listed in the HRI were all constructed in the early decades of the twentieth century, and include: 10 Pasa Robles Avenue, 52 Almond Avenue, 211 Yerba Buena Avenue, 90 Cody Lane (early Los Altos apartment building), 388-398 Main Street, 571 Cherry Avenue, 566 S. El Monte Road, the Jesuit Retreat House at 662 University Avenue, 350 Main Street, and St. Nicholas Roman Catholic Church at 473 Lincoln Avenue.

properties were also designated city Historic Landmarks.⁶⁵ The presence of other local examples of the style illustrates that the Halsey House is not a rare example of the style in Los Altos.



Figure 40: Pettigrew House at 1336 Cowper Street, Palo Alto. Listed in the National Register in 1980 for its architecture. Source: Google StreetView.



Figure 41: Dunker House at 420 Maple Street, Palo Alto. Listed in the National Register in 1982 for its architecture. Source: National Park Service.

Additionally, within the larger region, the Spanish Colonial Revival style is well represented with high style examples in nearby cities like Palo Alto, Mountain View, Hillsborough, and San Jose (**Figure 40 and Figure 41**). As such, the Halsey House is a good example of a vernacular interpretation of the Spanish Colonial Revival style but is not a high style or rare example of the style. As the architect or builder of the residence remains unidentified at this time, the Halsey House would not be considered significant for its association with an architect or builder.

⁶⁵ The two local Historic Landmarks are 388-398 Main Street (commercial, built circa 1909) and 571 Cherry Avenue (residential, built circa 1925).

VI. EVALUATION

California Register of Historical Resources

The California Register of Historical Resources (California Register) is an inventory of significant architectural, archaeological, and historical resources in the State of California. Resources can be listed in the California Register through a number of methods. State Historical Landmarks and National Register-listed properties are automatically listed in the California Register. Properties can also be nominated to the California Register by local governments, private organizations, or citizens. The evaluative criteria used by the California Register for determining eligibility are closely based on those developed by the National Park Service for the National Register of Historic Places. In order for a property to be eligible for listing in the California Register, it must be found significant under one or more of the following criteria.

- **Criterion 1 (Events):** Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- **Criterion 2 (Persons):** Resources that are associated with the lives of persons important to local, California, or national history.
- **Criterion 3 (Architecture):** Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values.
- **Criterion 4 (Information Potential):** Resources or sites that have yielded or have the potential to yield information important to the prehistory or history of the local area, California, or the nation.

The following section examines the eligibility of the Halsey House for individual listing in the California Register.

CRITERION 1 (EVENTS)

The site of the Halsey House and the Redwood Grove was first developed in 1912 with a summer cottage to provide a sunny summer retreat for the Wright family when they sought to escape the fog of San Francisco. This was a typical use of early residential properties in the Los Altos area and along the Peninsula.

In the 1920s, as schools, businesses, and institutions were adequately developed to support the year-round living of middle- and upper-class residents who were looking to move out of San Francisco, the property at Redwood Grove became an appealing location for the Halsey family to settle permanently. In 1923, the previous summer cottage was demolished and the Halsey House was constructed. The young Halsey children attended nearby schools, and the well-established commuter train allowed Theodore Halsey to easily travel to and from his office in San Francisco. Emma Halsey was most involved with the development of the property itself, and established the gardens, orchards, and redwood grove. Emma's gardening and landscaping at the Halsey House, with the assistance of her Japanese gardeners, Mori and Yoshio (Frank) Hongo, reflected the increasing residential use of the area but retained the rural feeling of the many orchards that still characterized Los Altos in the early twentieth century.

Many of the residences that were established in Los Altos during this period were located in the University/Orange area and developed as freestanding single-family homes that faced the street on small parcels of land. The Halsey House and property was developed in 1923 in the style of a more rural property and was sited to complement the existing topography, creek, and trees, including several mature oaks. Today, the property remains a rare example of an early Los Altos summer retreat that was developed into a permanent residential property at a time when Los Altos saw considerable growth in year-round residential properties. Although the Halsey House was developed as a permanent residence, it retained its rural character through the interests of its owners and the planting of many redwood trees that today define Redwood Grove Park. While most of the landscape planted by Emma, Mori, and Yoshio – including the many fruit trees and flowering plants surrounding the residence and within the rear courtyard – is no longer extant, the surviving oak trees, numerous redwoods, and the presence of Adobe Creek remain and convey the historic setting of the residence.

The Halsey House and the Redwood Grove is an excellent example of early residential patterns of Los Altos, and the establishment of Redwood Grove is a unique property developed by Emma Halsey and her Japanese gardeners in the 1920s. Therefore, the Halsey House and the Redwood Grove appear to be individually eligible for the California Register under Criterion 1 (Events), with a period of significance from the construction of the Halsey House in 1923 through the end of Emma Halsey's ownership of the property in 1945.

CRITERION 2 (PERSONS)

The Halsey House was constructed for Theodore and Emma Halsey in 1923 to serve as their permanent family home in Los Altos. Theodore lived at the house until his death in 1943, and Emma sold the house and property two years later in 1945. She passed away in the 1970s while residing in

Palo Alto. Following the Halseys' ownership, the property was owned by Edward and Rachel Bessey, who rented the property to a number of currently unidentified residents. The house was briefly owner-occupied for a period of a few months in 1970 by Meredith Pearson. Since the property was purchased by the city in 1974, it has been used as a museum and educational center, but was closed to the public in 2008 and has been vacant since that date.

Theodore Vail Halsey, Sr. had a successful career in the telephone industry and held executive positions at the Pacific Telephone & Telegraph Company, the Telephone Investment Company, and the Philippine Long Distance Telephone Company (PLDT). These professional accomplishments, however, are more closely associated with the locations of Halsey's work, particularly with regard to the PLDT's work in the Philippines, and not his family home. While he had a personal office/library within the residence (located in the original northwest corner of the building), research has not indicated that Halsey entertained professional colleagues, or held important business meetings at the Halsey House that would identify it as significant in relation to Theodore Halsey's professional accomplishments. Therefore, the Halsey House is not significant for its association with Theodore Halsey under Criterion 2.

Emma Wright Halsey is the individual most closely associated with the subject building and the property, as she first located the property for her parents to purchase in 1912, was married on the property in 1915, lived at the Halsey House from 1923 to 1945, and transformed the site through her gardening work with the assistance of gardeners Mori and Yoshio Hongo. Little is known about the personal accomplishments of Emma Halsey beyond her gardening at the Halsey House. Research has not identified Emma Halsey as a gardener or landscape designer of any additional properties beyond her own, and the Halsey House and Redwood Grove would therefore not be considered as part of a larger body of work. Thus, Emma Halsey's contributions to the Halsey House are tied to the development of the property itself and the accomplishment of creating the Redwood Grove, which is more clearly represented through Criterion 1 (Events). She did not otherwise contribute to local, state, or national history such that she should be considered a historically significant person. The Halsey House and landscape are not individually eligible for their association with Emma Halsey under Criterion 2.

The Halsey House and Redwood Grove are also related to the professional careers of both Mori and Yoshio Hongo, who were employed as gardeners by Emma and Theodore Halsey and resided on the property during their periods of employment. Both Mori and Yoshio were born in Japan and immigrated to the United States where they found work as orchard farmers and gardeners. Mori was hired by the Halseys in the early 1920s and was involved in the initial planting of the redwoods on the property and the early landscaping of the property. Mori retired in the 1930s and recommended Yoshio "Frank" Hongo as his replacement. Yoshio, who was already employed as a

gardener in Los Altos, had also previously worked in the fruit orchards of the Los Altos area. Yoshio and his family resided in the caretaker's cottage until 1942, when they were forcibly relocated by the United States Government to Heart Mountain Relocation Center in Wyoming. Both men played important roles in the creation and maintenance of Redwood Grove, but their individual contributions to the creation of the property do not rise to a level of importance such that they would be considered significant at the local, state, or national level for the property to be eligible under Criterion 2 for its association with either man as an individual. Much like Emma Halsey, their contributions to the property are better represented through Criterion 1 (Events).

Aside from the Halsey family, later owners of the Halsey House lived at the residence either only briefly or not at all, and are therefore not significantly associated with the house such that it would be significant for their personal or professional accomplishments. The other occupants of the Halsey House, from 1945 until 1974, rented the property for unknown periods of time, and their identities are largely unknown. Archival research did not uncover any significant personal achievements connected with the subject building.

Therefore, the Halsey House does not appear to be eligible for the California Register under Criterion 2 (Persons).

CRITERION 3 (DESIGN/ARCHITECTURE)

The Halsey House was constructed in 1923 and was designed by an unknown architect. The building was expanded through two early additions, including a 1928 addition to the northwest corner of the building and the extension of the east wing at an unknown date, possibly in the early 1930s. Both additions were designed to blend with the existing style and design of the building and matched the exterior finish, clay tile roofing, and existing wood sash multi-lite windows and doors of the 1923 residence. The building was designed in a modest Spanish Colonial Revival style and demonstrates characteristics of the style through its stucco cladding, hipped clay tile roof, low one-story massing arranged around a private courtyard with bench seating and a fountain, and extensive use of multi-lite windows and doors. Detailing is largely limited to the scored and tinted cement patios, stone paving of the courtyard, and some metal features, including original door and lamp fixtures. Overall, the building lacks the decorative features that are typical of both modest and high-style examples of the style, such as decorative plasterwork, tile, or exposed wood elements. The Halsey House is not the only example of the Spanish Colonial Revival style in Los Altos, and nine other properties designed in the Spanish Colonial Revival style are listed in the Los Altos HRI. Therefore, the Halsey House would not be considered a rare example. Additionally, within the larger region of the San Francisco Peninsula and South Bay, the Spanish Colonial Revival style is well represented, with fine examples in nearby cities like Palo Alto, Mountain View, Hillsborough, and San Jose.

As such, the Halsey House is an example of a simple interpretation of the Spanish Colonial Revival style but is not a high style or rare example of the style such that it would be individually significant for its architecture. It does not represent distinctive methods of construction or craftsmanship. As the architect or builder of the residence remains unidentified, the Halsey House is not considered significant for its association with a master architect or builder. Therefore, the Halsey House does not appear to be eligible for the California Register under Criterion 3 (Design/Architecture).

The residence was initially set within a planned landscape of flowering plants, hedges, ferns, and fruit trees, with built landscape elements including stone-lined planting beds, wood benches, and wood bridges over Adobe Creek, which was developed by Emma Halsey with her gardeners. While the oak trees, redwoods, and Adobe Creek survive today and characterize the setting of the Halsey House, the majority of the designed plantings of the landscape have been removed since Emma Halsey sold the property in 1945. Therefore, the landscape of the Halsey House would not be considered significant as a formally designed landscape designed by Emma Halsey. The Redwood Grove as a natural landscape is therefore more clearly significant under Criterion 1 (Events) and would not be considered individually significant under Criterion 3 for its landscape design.

CRITERION 4 (INFORMATION POTENTIAL)

The “potential to yield information important to the prehistory or history of California” typically relates to archeological resources, rather than built resources.⁶⁶ When California Register Criterion 4 (Information Potential) does relate to built resources, it is relevant for cases when the building itself is the principal source of important construction-related information. The analysis of the Halsey House for eligibility under Criterion 4 is beyond the scope of this report.

Integrity

In order to qualify for listing in any local, state, or national historic register, a property or landscape must possess significance under at least one evaluative criterion as described above and retain integrity. Integrity is defined by the California Office of Historic Preservation as “the authenticity of an historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance,” or more simply defined by the National Park Service as “the ability of a property to convey its significance.”⁶⁷

⁶⁶ California State Office of Historic Preservation. *Technical Assistance Bulletin No. 7: How to Nominate a Resource to the California Register of Historical Resources*. Sacramento: California Office of State Publishing, (September 4, 2001), 11.

⁶⁷ Ibid.

In order to evaluate whether the subject property retains sufficient integrity to convey its historic significance, Page & Turnbull used established integrity standards outlined by the *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Seven variables, or aspects, that define integrity are used to evaluate a resource's integrity—location, setting, design, materials, workmanship, feeling, and association.⁶⁸ A property must possess most, or all, of these aspects in order to retain overall integrity. If a property does not retain integrity, it can no longer convey its significance and is therefore not eligible for listing in local, state, or national registers.

The seven aspects that define integrity are defined as follows:

Location is the place where the historic property was constructed or the place where the historic event occurred;

Setting addresses the physical environment of the historic property inclusive of the landscape and spatial relationships of the building(s);

Design is the combination of elements that create the form, plan, space, structure, and style of the property;

Materials refer to the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form the historic property;

Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;

Feeling is the property's expression of the aesthetic or historic sense of a particular period of time; and

Association is the direct link between an important historic event or person and the historic property.

LOCATION

The Halsey House and property retains integrity of location. The building has remained situated at its location of original construction since 1923 and the overall property has retained its location and its approximate size.

⁶⁸ U.S. Department of the Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* (Washington, D.C.: National Park Service, 1995), 44.

SETTING

The Halsey House retains integrity of setting. The building was erected within a large, six-acre piece of land and was sited to take advantage of the landscape and the curve of Adobe Creek. Early in the property's history, Emma Halsey and Mori, her gardener, planted many redwood saplings to complement the existing oak trees on the property. The landscaping work by Emma was continued into the early 1940s with the assistance of Yoshio Hongo, following Mori's retirement. These redwoods remain today and have grown to maturity. The Halsey House therefore retains its wooded and natural setting.

DESIGN

The Halsey House retains integrity of design. The building has undergone several alterations to both its exterior and interior; however, it retains its overall form, massing, and materials and is recognizable as a modest example of a 1920s Spanish Colonial Revival style residence. The building retains its one-story form organized around a private rear courtyard, and its use of stucco cladding and clay-tile hipped roofs demonstrate the typical materials of the style. While lacking the more ornate features of the style including decorative plasterwork, tile, and exposed wood elements, the building features a large number of multi-lite windows and French doors that illustrate the porous relationship between the interior and exterior spaces of the building. Alterations to the massing and footprint of the building were undertaken during the ownership of the Halsey family and are considered historic. The original design of the building remains intact, and the materials, decoration, craftsmanship, and massing of the building have remained largely unchanged with the exception of some replacement windows and doors since 1945, when Emma Halsey sold the property. Therefore, the building retains integrity of design.

MATERIALS

The Halsey House retains integrity of materials. While the condition of the building is currently poor, the Halsey House does retain a high degree of original materials including its stucco cladding, clay tile roof, multi-lite windows and doors, and some metal features including original hardware and portions of lighting fixtures. Other features that remain include the rear courtyard wall with its fountain, benches, and round-arched door, the stone patio within the courtyard, stone semi-circular steps outside the rear courtyard door, and the tinted concrete patios along the entrance porch, north façade, and rear courtyard.

WORKMANSHIP

The Halsey House retains integrity of workmanship. The Halsey House is a wood-frame building with stucco cladding and a clay tile hipped roof. The building is modest, with few decorative details, and the workmanship of the building is most clearly demonstrated through the simplicity of its detailing that provides a unified feeling to the design of the building. The consistent stucco cladding and clay tile roofing, the presence of multi-lite wood sash windows and doors, and the detailing of the scored and tinted concrete patios and metal features, including original door and lamp fixtures, demonstrate the workmanship of this 1920s residence.

FEELING

The Halsey House retains integrity of feeling. The building retains the feeling of an early 1920s residence that was intended to serve as a year-round home for the Halsey family and was set within a wooded, lush landscape along Adobe Creek. The property retains its semi-rural feeling through its wooded setting that is removed from the main public right-of-way on University Avenue.

ASSOCIATION

The Halsey House retains integrity of association. The building is significant for its residential development history and the development of Redwood Grove in the early 1920s by Emma Halsey and Mori. These associations continue to be represented through the retention of the residence's architectural characteristics that date to the time of Emma Halsey's period of residence and the retention of the property's landscape and the redwood trees that were transplanted to the site by Emma and Mori in the early 1920s.

Therefore, the Halsey House retains all seven aspects of integrity such that it conveys its significance under Criterion 1 (Events) of the California Register, with a period of significance from 1929-1945.

Character-Defining Features

For a property to be eligible for national or state designation under criteria related to type, period, or method of construction, the essential physical features (or character-defining features) that enable the property to convey its historic identity must be evident. These distinctive character-defining features are the physical traits that commonly recur in property types and/or architectural styles. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction, and these features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.

The character-defining features of the Halsey House consist of those features which date to the building's period of significance from 1923 to 1945 under Criterion 1, for the Halsey House as an excellent example of the changing residential development of Los Altos and for its direct connection to the establishment of the wooded property that is now Redwood Grove Park. The character-defining features of the Halsey House include the original features, materials, and design elements of the building and landscape as completed in 1923 and any alterations undertaken during Emma Halsey's period of residence, which ended when she sold the property in 1945. These features include, but are not limited to:

EXTERIOR FEATURES OF THE HALSEY HOUSE

- Overall form and massing of the building (low, horizontal emphasis)
- Clay tile clad hipped roof
- Stucco cladding along exterior with a textured finish
- Original multi-lite wood sash windows, including three-over-one double-hung windows with ogee lugs, four-lite wood casement windows, six-lite wood casement windows, and six-lite wood sash slider windows
- Multi-light glazed French doors
- Multi-light sidelights flanking doors at the entrance porch and along south-facing wall of rear courtyard
- Tinted and stamped concrete at front entry porch and terrace
- Enclosed rear courtyard with tinted and stamped concrete patio at north end, built-in bench seating, fountain, and stone patio with steps at south end, and concrete stairs and metal railing at south end of west wing
- Original chimney with stucco cladding along south-facing wall of courtyard
- South courtyard wall with round arched wood plank door
- Semi-circular stone stairs along exterior of courtyard door in south courtyard wall
- Extant original metal fixtures including portions of original lamps and original door hardware at primary entrance

INTERIOR FEATURES OF THE HALSEY HOUSE

- Original brick and tile fireplaces
- Original wood floors
- Plaster walls and ceilings
- Original wood panel doors
- Original hardware and wood trim of doors and windows
- Original wood baseboards and picture molding

SITE

- Residence located deep within the approximately six-acre parcel and not visible from University Avenue
- Natural setting including:
 - Mature redwood trees
 - Mature oak trees
 - Adobe Creek
- Additional fruit trees, flowering trees, and plantings that appear to date from the period of significance

Los Altos Historic Landmark and Historic Resource Criteria

The City of Los Altos has adopted a similar evaluation framework for the evaluation of historic resources as the California Register and the National Register. For a property to be a historic resource, it must be over fifty years of age, retain its physical integrity, and have historical significance related to historic events, persons, architecture and design, or archaeological significance.⁶⁹ These four areas of significance are nearly identical to the California Register's Criteria 1 through 4.

In order to be a City of Los Altos Historic Landmark, the resource must additionally have either a heightened level of significance or be a rare example of its type.

Halsey House as a Designated Historic Landmark

As discussed previously (refer to **Existing Historic Status**), the Halsey House and the Redwood Grove property is a designated Historic Landmark. The property was first listed in 1981, and subsequent architectural surveys have established that the residence was identified as significant for its association with the Halsey family and as a good example of the Spanish Colonial Revival style, and that the Redwood Grove is considered a unique natural landscape of Los Altos. Due to the existing condition of the building and the length of time since the Halsey House was previously evaluated, Page & Turnbull was asked to reevaluate the Halsey House to determine if it remains a Los Altos Historic Landmark.

As mentioned earlier, in 2012, the HRI was revised and the criteria for evaluation were aligned with the existing evaluation criteria for both the National Register and California Register. Today, a historic resource for the City of Los Altos is determined through establishing that it meets the age

⁶⁹ CIRCA: Historic Property Development, *City of Los Altos Historic Resource Inventory*, (October 2012), I-13.

threshold of fifty years, retains its physical integrity, and meets one or more of the criteria for historic significance.⁷⁰

The Halsey House is nearly a century old at the time of this report and meets the age threshold as a historic resource. In addition, while the condition of the building is poor overall due to environmental damage and vandalism, the building retains over 50 percent of its original materials, form, and character-defining features, which is the threshold for physical integrity as established in the Los Altos HRI.⁷¹ Overall, as discussed in the previous section (refer to **Integrity**), the Halsey House retains a high level of integrity such that it continues to meet the requirements for listing as a Historic Landmark. Lastly, as discussed above in the California Register evaluation section, the Halsey House is significant in association with important local events.

As stated by the Los Altos Preservation Ordinance, in order to be a Historic Landmark, a resource must also possess “special historical, cultural, archeological, scientific, architectural or aesthetic interest or value as part of the heritage or history of the city, the county, the state or the nation.”⁷² While the specific criterion for significance that is discussed within this report (association with important patterns of local development) differs from the previously identified criteria for significance (an association with persons and rare architectural design), the property clearly continues to represent a rare or unique property. The writing of a property-specific Historic Resource Evaluation, in contrast to the previous findings that were documented as part of a larger architectural survey, allowed for in-depth study of the resource that uncovered additional information. This targeted study supports a more nuanced narrative of the building and property’s development and incorporates the individual actions of Emma Halsey as an aspect of that significance. The Halsey House and Redwood Grove continue to express a special historical and aesthetic value to the City of Los Altos through its unique development and setting, and therefore the building and the larger property of the Redwood Grove continues to meet the requirements for listing as a City of Los Altos Historic Landmark.

Halsey House as a Contributor to a Possible Historic District

The Halsey House was identified as a possible contributor to the University/Orange Historic District during the 1990 architectural survey. This district has never been formally adopted and Page & Turnbull recommends an updated survey of the proposed historic district to determine whether renovations, rehabilitations, and new construction since the 2012 revised HRI was issued have impacted the overall physical integrity of the possible district.

⁷⁰ Ibid., I-11 to I-14.

⁷¹ Ibid., I-12.

⁷² Los Altos Municipal Code, Chapter 12.44 – Historic Preservation. Article 2. 12.44.070 - Historic landmark designation.

From an initial review of the possible University/Orange Historic District, Page & Turnbull believes that the Halsey House does not fit the overall character of the potential historic district. The characteristics of the possible historic district include: a unified street layout with alleyways, continuity of the overall streetscape despite a large variety of lot size and scale, a period of construction from 1908 to 1930, and a significant number of architect-designed residences that are representative of the typical styles of the period.⁷³ While constructed within the period of development of the possible district, the other characteristics that identify the Halsey House and Redwood Grove as a unique property that meets the criteria as a local landmark and California Register-eligible property, are some of the same characteristics that identify it as distinct from the typical patterns of the University/Orange Historic District. The Halsey House and Redwood Grove has a unique wooded and semi-rural setting that is far removed from the street, and while constructed for an upper-class family, the residence lacks the architectural pedigree of many of the other architect-designed residences of the potential historic district. Therefore, it does not appear to be a potential contributor to the possible historic district.

⁷³ Ibid., II-6 to II-7.

VII. CONCLUSION

The Halsey House was erected in 1923 as a single-family residence for Theodore and Emma Halsey by an unknown architect or builder. Located on a large, approximately six-acre, parcel of land, the Halsey House is set within a wooded landscape along Adobe Creek. The building was constructed in a modest Spanish Colonial Revival style that consists of a one-story building arranged around a rear courtyard. The building features stucco cladding, a clay tile hipped roof, and a large number of multi-lite windows and doors that create a porous relationship between the interior of the residence and the exterior landscape of the Redwood Grove and the rear courtyard.

Page & Turnbull found the Halsey House and Redwood Grove eligible for the California Register under Criterion 1 (Events) at the state level of significance as an excellent example of the residential development patterns of Los Altos and for the establishment of the Redwood Grove, which is a unique property developed initially by Emma Halsey and her Japanese gardener, Mori, in the early 1920s. Under Criterion 1, the building and property have a period of significance from 1923 to 1945, beginning with the construction of the residence and ending with the sale of the property by Emma Halsey. Page & Turnbull did not find the property significant under Criterion 2 (Persons), Criterion 3 (Design/Architecture), or Criterion 4 (Information Potential). The building retains a high level of integrity as many of the original materials and design features are extant, and the form and massing of the building have remained largely unchanged despite interior alterations and the replacement of some doors and windows. While a large portion of the planned landscape and courtyard garden have been lost, the property retains its unique wooded setting that was developed in the early 1920s.

The subject building and the larger property of Redwood Grove Park have been a listed Los Altos Historic Landmark since 1981 and continue to retain adequate physical integrity to remain a listed Historic Landmark Resources despite the recent deterioration caused by vandalism and environmental conditions.

Therefore, the Halsey House and Redwood Grove is a historic resource, both as a listed local Historic Landmark, and as an individual resource that is eligible for listing on the California Register under Criterion 1.

VIII. REFERENCES

Published Works & Reports

- Archibald, Robert. "Indian Labor at the California Missions." *The Journal of San Diego History*. Spring 1978, v. 24, no. 2. Accessed July 2020, <https://sandiegohistory.org/journal/1978/april/labor/>
- Architectural Resources Group. *Halsey House Historic Structures Report*. Prepared for the City of Los Altos, November 2019.
- California State Office of Historic Preservation. Built Environment Resource Directory (BERD). Santa Clara County, updated March 2020.
- California State Office of Historic Preservation. "California Historical Resource Status Codes." updated March 2020
- California State Office of Historic Preservation. *Technical Assistance Bulletin No. 7: How to Nominate a Resource to the California Register of Historical Resources*. Sacramento: California Office of State Publishing, September 4, 2001.
- California State Office of Historic Preservation. *Technical Assistance Bulletin No. 8: User's Guide to the California Historical Resource Status Codes & Historic Resources Inventory Directory*. Sacramento: California Office of State Publishing. November 2004. Accessed October 22, 2018, <http://ohp.parks.ca.gov/pages/1069/files/tab8.pdf>.
- Circa: Historic Property Development, City of Los Altos Historic Resource Inventory, (October 2012)
- Eastman, Shirley. "History of the Los Altos Area." in *Memories of Los Altos*. Joe Salameda (ed.). Los Altos: Los Altos Historical Association, 1982.
- Foote, H.S. (ed.). *Pen Pictures From The Garden of the World or Santa Clara County, California. Illustrated*. Chicago: The Lewis Publishing Company, 1888.
- National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Washington, D.C.: National Park Service, 1995.
- San Francisco Planning Department. *Preservation Bulletin 18: Residential and Commercial Architectural Periods and Styles in San Francisco*. Accessed May 12, 2021, https://sfplanning.org/sites/default/files/documents/preserv/bulletins/HistPres_Bulletin_18.PDF
- Savage McAlester, Virginia. *A Field Guide to American Houses*. Second Edition. New York: Knopf, 2018.
- Wollenberg, Charles. *Golden Gate Metropolis: Perspectives on Bay Area History*. Berkeley, California: Institute of Governmental Studies, University of California, Berkeley, 1985.

Newspapers & Periodicals

- "Air Lines Sued for \$200,000 by Pilot in Crash," *Oakland Tribune*, April 12, 1950.
- "Atlantic Airliner Toll Drops to 8," *The Fresno Bee*, August 17, 1949.

Chapman, Robin. "Santa Clara Valley Lives: Revisit the Story of the Halsey House and its Pioneering Owners." *Los Altos Town Crier*. March 14, 2018.

"Glass Must Stand Trial," *Oroville Daily Register*, July 24, 1912.

"Halsey's Story is 'Cooked Up,'" *The Fresno Morning Republican*, October 12, 1907.

"Mira [sic] Wright was a Pioneer Resident," *Los Gatos Times-Saratoga Observer*, October 13, 1944.

"Rachel Miller Shaw Bessey," *Los Altos Town Crier*, February 8, 2012, Accessed July 27, 2021, https://www.losaltosonline.com/people/obituaries/rachel-miller-shaw-bessey/article_0f19701f-f092-59ac-b987-a91c08119d8c.html

"Theo. V. Halsey Will Wed Miss Emma Wright," *The San Francisco Examiner*, June 16, 1915.

"Theodore V. Halsey Weds [Emma] Minerva Wright," *Oakland Tribune*, June 16, 1915.

Public Records

Circa: Historic Property Development. "Halsey House (Redwood Grove Park). State of California DPR 523A and 523B forms. Completed March 2009.

Los Altos Municipal Code. Chapter 12.44 – Historic Preservation.

United States Federal Census. 1900, 1920, 1930, 1940. Available via Ancestry.com.

Archival Records

Ancestry.com

Backs, Marie. Photographs, plans, and material in personal collection.

City and County Directories. Various cities and counties. Available via Ancestry.com.

City of Los Altos. "Halsey House." Plans, photographs, and files.

"Eugenia Halsey Buss Interview, August 23, 2001." Transcribed interview of Eugenia Halsey Buss (and Robert Buss) by Don McDonald, Los Altos History Museum, Oral History Program.

Los Altos History Museum. "Halsey House." Historic photographs and files.

Newspapers.com

Phillips, Meredith. Written history of memories of Halsey House, supplied to author by Phillips.

Sanborn Map Company. Various maps. Available via the San Francisco Public Library.

Voter Registration Records, Purissima. 1940. Available via Ancestry.com.

Internet Sources

Friends of Historic Redwood Grove. "History of Halsey House and Redwood Grove."
<http://www.friendsofhistoricredwoodgrove.org/>

"History of Los Altos," City of Los Altos, Accessed July 2021,
<https://www.losaltosca.gov/community/page/history-los-altos>

Personal Communications

Backs, Marie. Telephone conversations with author on July 15 and 21, 2021.

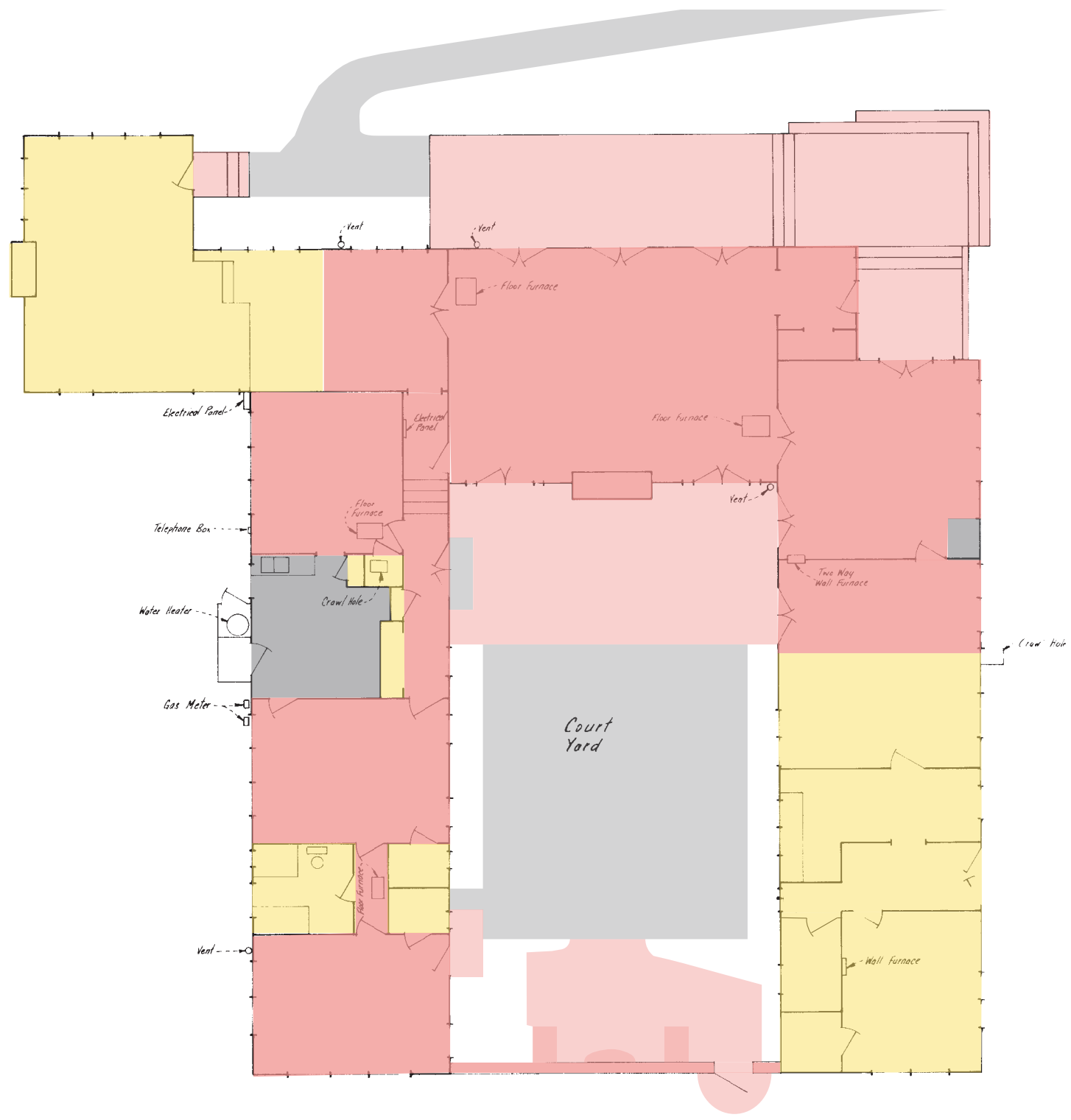
Phillips, Meredith. Telephone conversation with author on July 22, 2021.

IX. APPENDIX

Significance and Chronology Diagrams of the Halsey House

CATEGORIES OF SIGNIFICANCE

- SIGNIFICANT/HISTORIC**
Features or spaces that date to the period of significance (1923-1945) and are the most historically significant components of the building.
- CONTRIBUTING**
Features or spaces that date to the period of significance (1923-1945) and are characterized by a lesser degree of significance (such as service spaces, closets, etc.) or are slightly altered or replaced elements. They cumulatively contribute to the overall historic character of the building.
- NON-CONTRIBUTING**
Features or spaces that were constructed after the period of significance (post-1945), have been significantly altered, or do not contribute to the overall historic character of the building. These features are not considered historic.

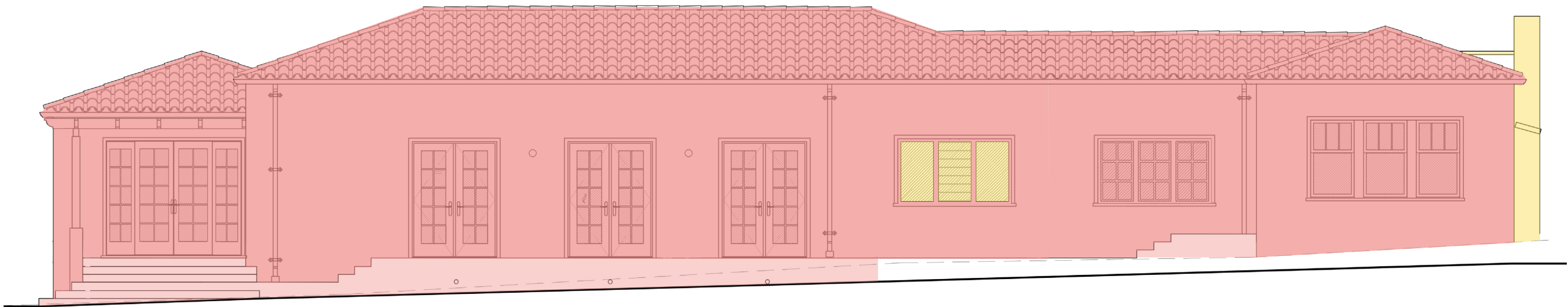


Notes:
Lighter hues of significance categories show built features of the courtyard and landscape.

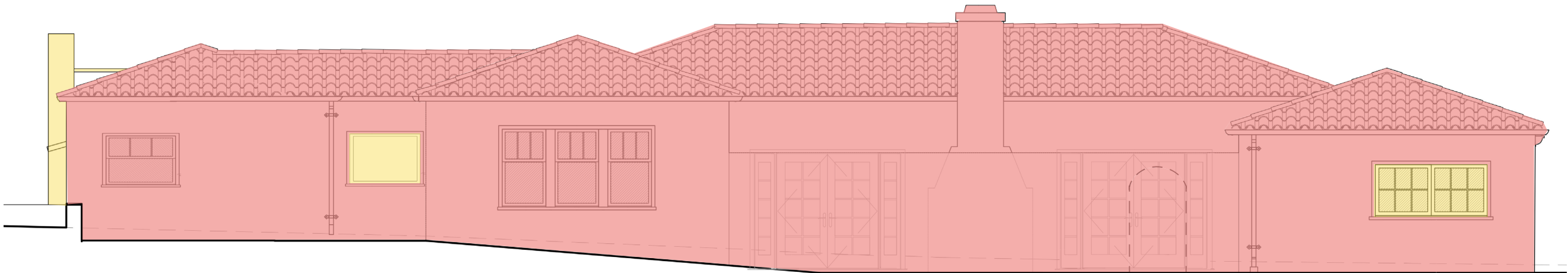
White space within diagrams denotes planting and dirt areas without built features.

CATEGORIES OF SIGNIFICANCE

- SIGNIFICANT/HISTORIC
- CONTRIBUTING
- NON-CONTRIBUTING



PRIMARY (NORTH) FACADE



SOUTH FACADE

Significance Diagrams

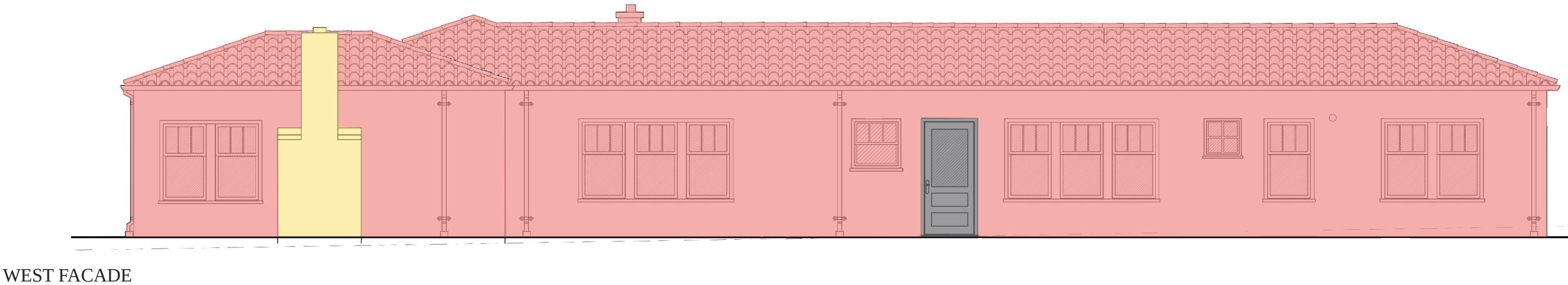
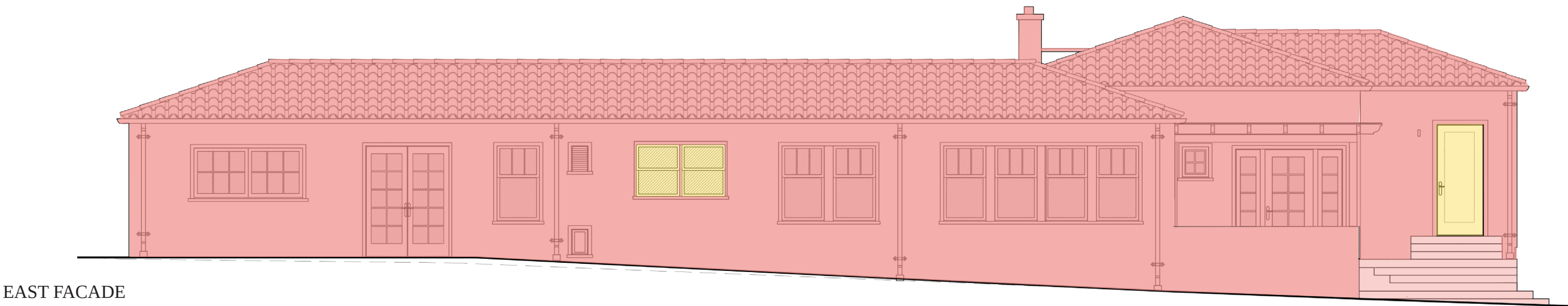
HALSEY HOUSE - LOS ALTOS, CALIFORNIA

Base drawings based on the 2015 proposed project drawings by M. Sandoval Architects, altered to reflect the existing building by Page & Turnbull, 2021. Drawings are not to scale and may contain some inaccuracies.

PAGE&TURNBULL

CATEGORIES OF SIGNIFICANCE

- SIGNIFICANT/HISTORIC
- CONTRIBUTING
- NON-CONTRIBUTING



Significance Diagrams

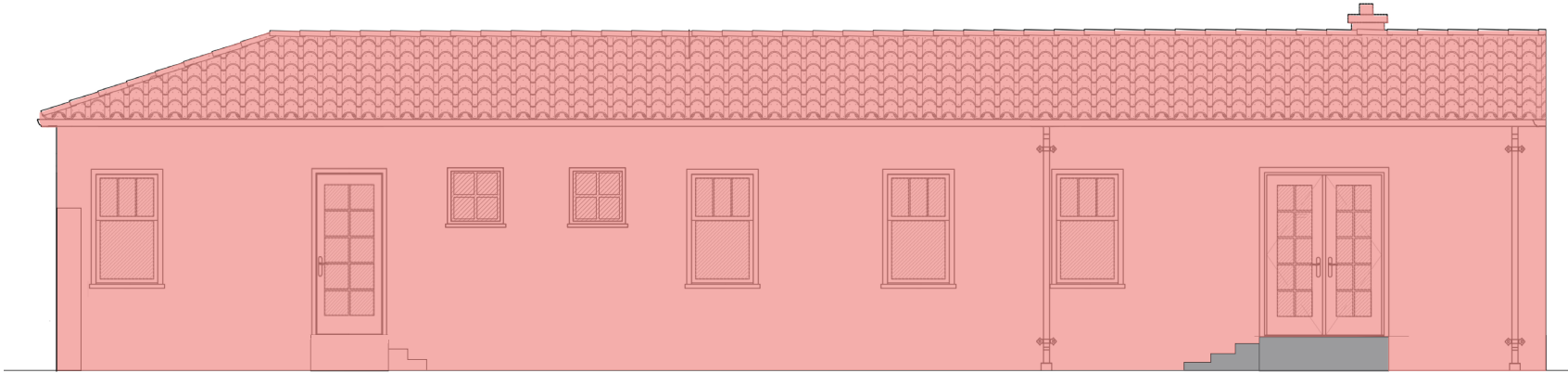
HALSEY HOUSE - LOS ALTOS, CALIFORNIA

Base drawings based on the 2015 proposed project drawings by M. Sandoval Architects, altered to reflect the existing building by Page & Turnbull, 2021. Drawings are not to scale and may contain some inaccuracies.

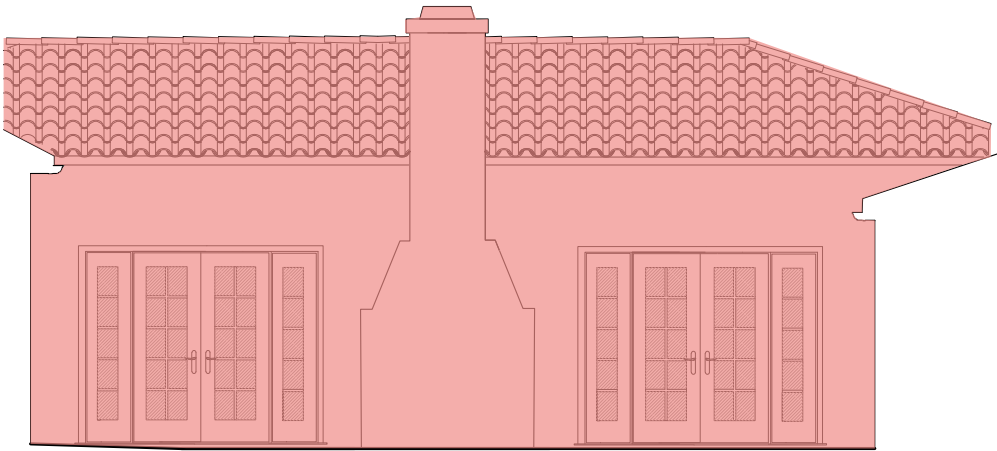
PAGE&TURNBULL

CATEGORIES OF SIGNIFICANCE

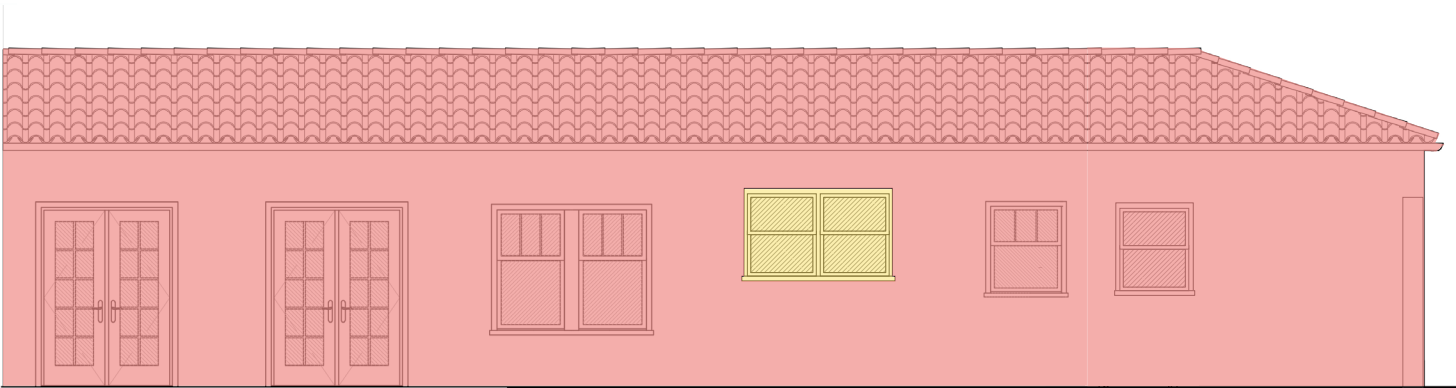
- SIGNIFICANT/HISTORIC
- CONTRIBUTING
- NON-CONTRIBUTING



EAST-FACING WALL OF REAR COURTYARD



SOUTH-FACING WALL OF REAR COURTYARD



WEST-FACING WALL OF REAR COURTYARD

Significance Diagrams

HALSEY HOUSE - LOS ALTOS, CALIFORNIA

Base drawings based on the 2015 proposed project drawings by M. Sandoval Architects, altered to reflect the existing building by Page & Turnbull, 2021. Drawings are not to scale and may contain some inaccuracies.

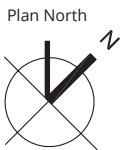
CONSTRUCTION CHRONOLOGY

ORIGINAL 1923 CONSTRUCTION
Features that date to the original construction of the residence in 1923.

ALTERATIONS BY THE HALSEY FAMILY
Early alterations and additions to the Halsey House were completed by the Halsey family in 1928 and at an unknown date circa the 1930s.

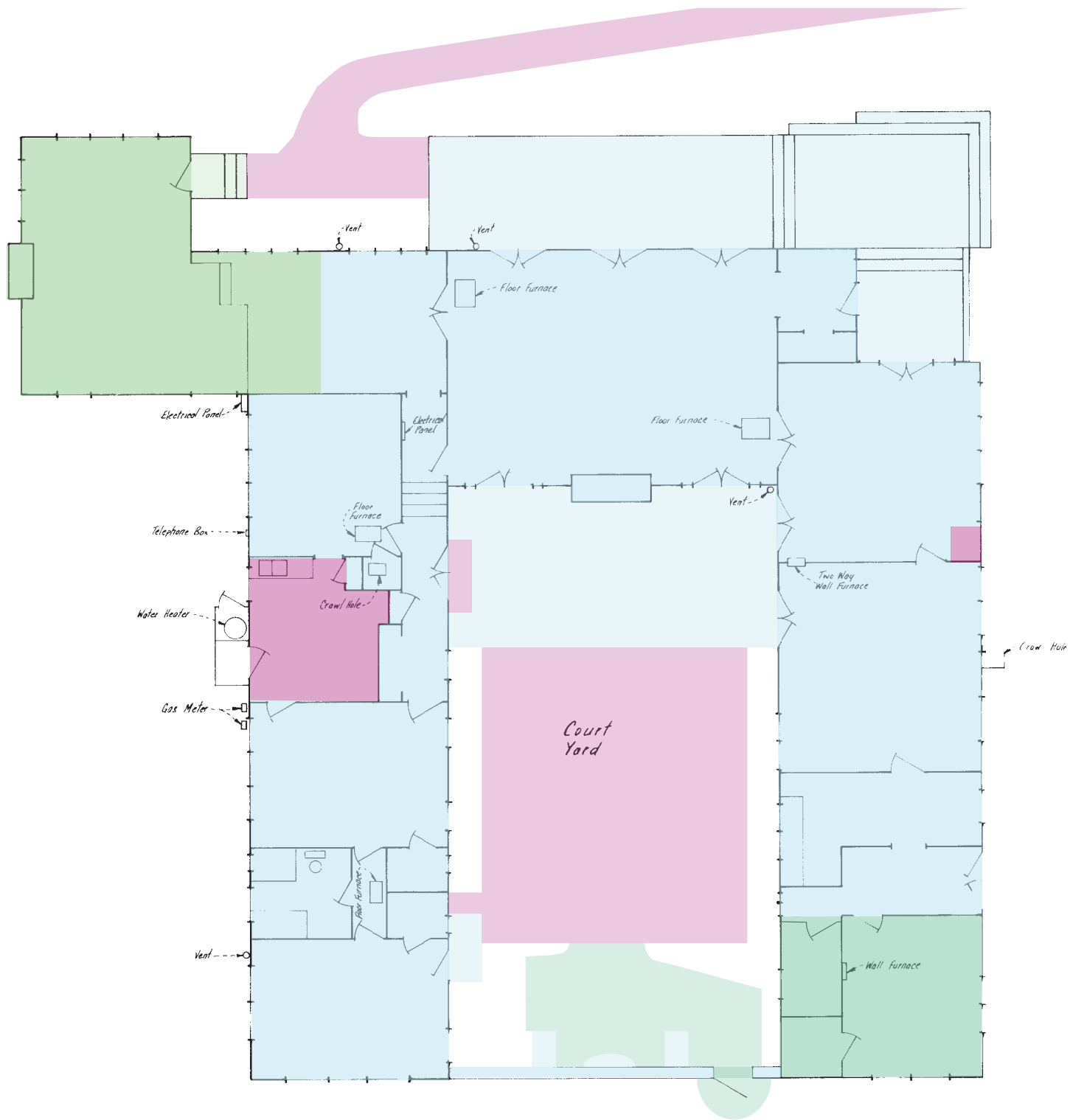
- 1928 Addition
- Circa 1930s Addition/Alterations

ALTERATIONS POST-1945
Alterations that have taken place since the end of the Halsey family's ownership of the house and the period of significance.



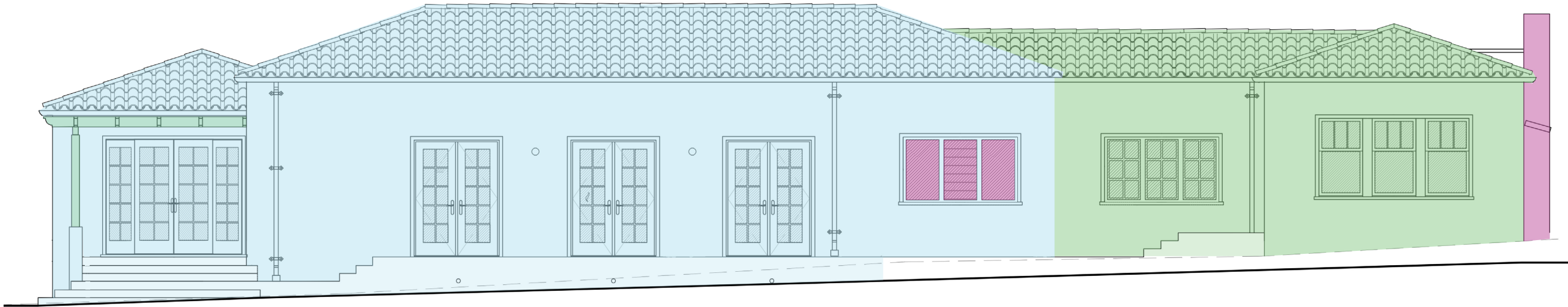
Notes:
Lighter hues of chronology categories show built features of the courtyard and landscape.

White space within diagrams denotes planting areas and dirt areas without built features.

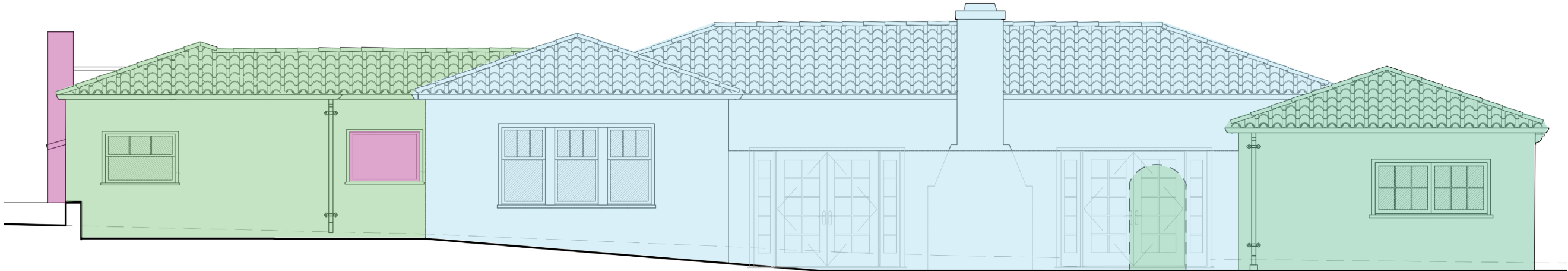


BUILDING CHRONOLOGY

- ORIGINAL 1923 CONSTRUCTION
- ALTERATIONS BY THE HALSEY FAMILY
 - 1928 Addition
 - Early Additions/Alterations (circa 1930s)
- ALTERATIONS POST-1945



PRIMARY (NORTH) FACADE



SOUTH FACADE

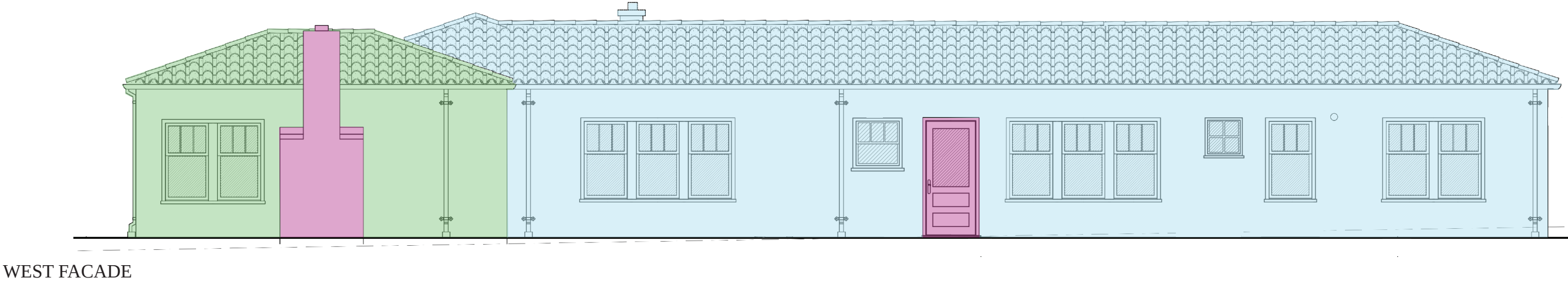
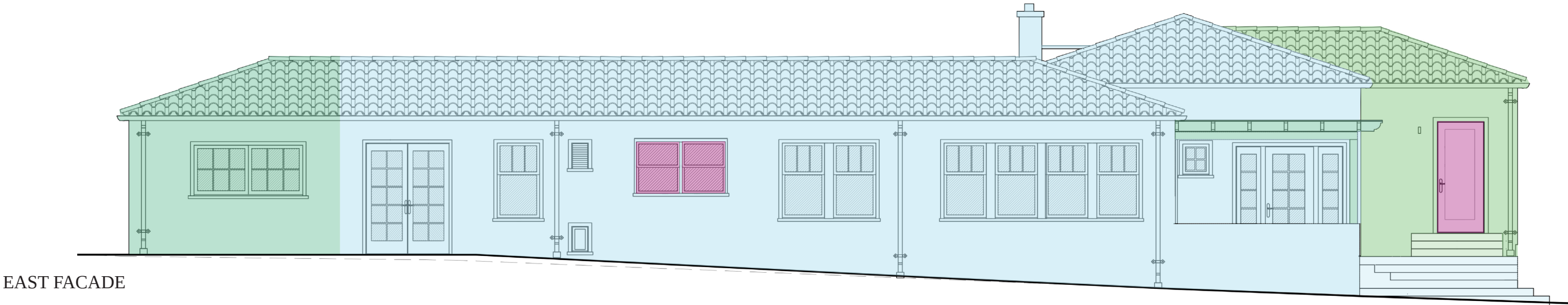
Construction Chronology Diagrams

HALSEY HOUSE - LOS ALTOS, CALIFORNIA

Base drawings based on the 2015 proposed project drawings by M. Sandoval Architects, altered to reflect the existing building by Page & Turnbull, 2021. Drawings are not to scale and may contain some inaccuracies.

BUILDING CHRONOLOGY

- ORIGINAL 1923 CONSTRUCTION
- ALTERATIONS BY THE HALSEY FAMILY
 - 1928 Addition
 - Early Additions/Alterations (circa 1930s)
- ALTERATIONS POST-1945



Construction Chronology Diagrams

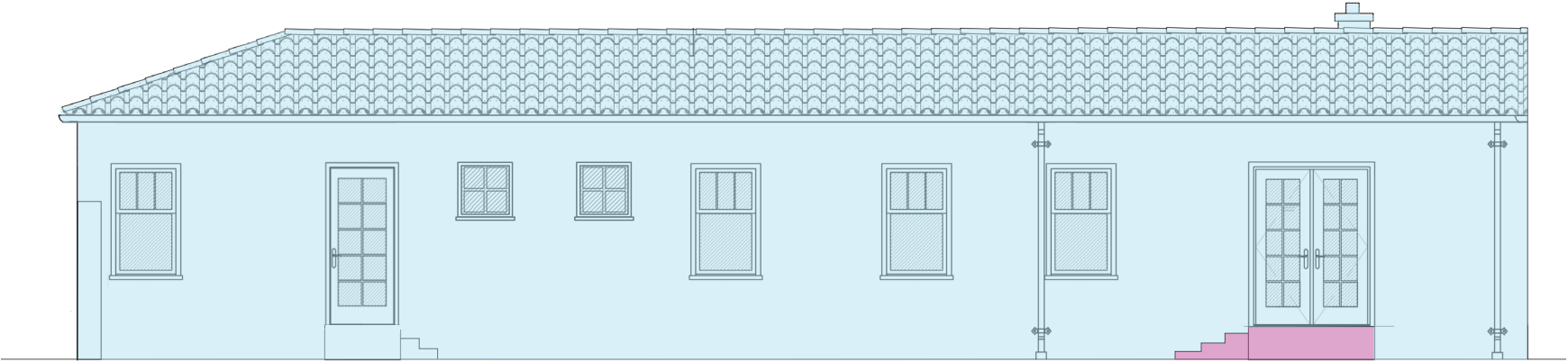
HALSEY HOUSE - LOS ALTOS, CALIFORNIA

Base drawings based on the 2015 proposed project drawings by M. Sandoval Architects, altered to reflect the existing building by Page & Turnbull, 2021. Drawings are not to scale and may contain some inaccuracies.

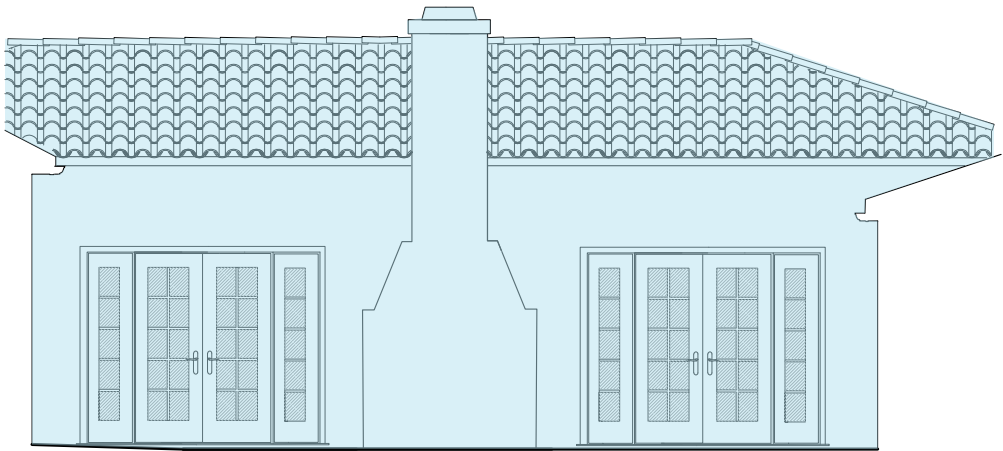
PAGE&TURNBULL

BUILDING CHRONOLOGY

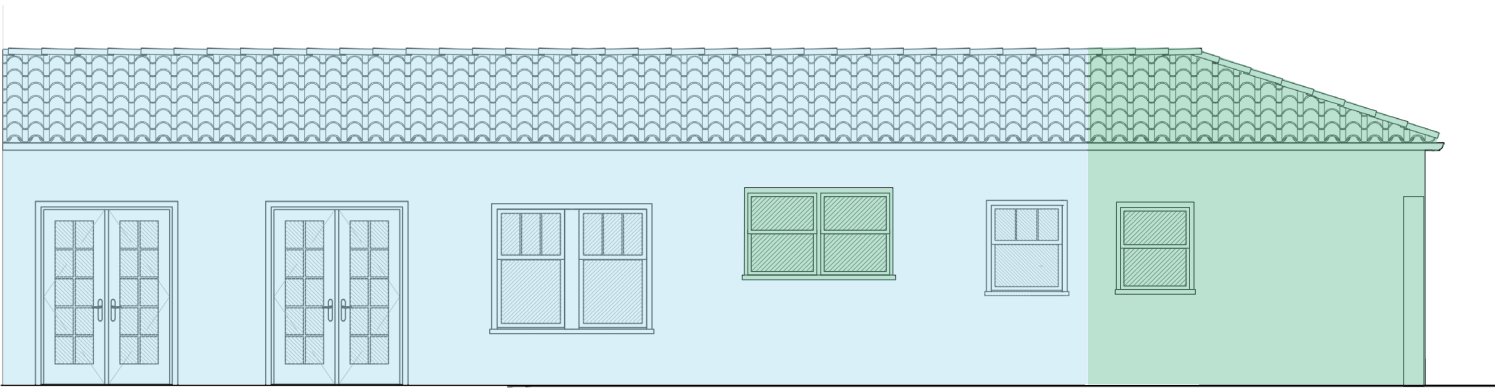
- ORIGINAL 1923 CONSTRUCTION
- ALTERATIONS BY THE HALSEY FAMILY
 - 1928 Addition
 - Early Additions/Alterations (circa 1930s)
- ALTERATIONS POST-1945



EAST-FACING WALL OF REAR COURTYARD



SOUTH-FACING WALL OF REAR COURTYARD



WEST-FACING WALL OF REAR COURTYARD

Construction Chronology Diagrams

HALSEY HOUSE - LOS ALTOS, CALIFORNIA

Base drawings based on the 2015 proposed project drawings by M. Sandoval Architects, altered to reflect the existing building by Page & Turnbull, 2021. Drawings are not to scale and may contain some inaccuracies.

This page intentionally left blank.



PAGE & TURNBULL

Imagining change in historic environments through
design, research, and technology

417 S. HILL STREET, SUITE 211 LOS ANGELES, CALIFORNIA 90013 TEL 213.221.1200
2600 CAPITOL AVENUE, SUITE 120 SACRAMENTO, CALIFORNIA 95816 TEL 916-930-9903
170 MAIDEN LANE, 5TH FLOOR SAN FRANCISCO, CALIFORNIA 94108 TEL 415.362.5154



TYPE OF SERVICES	Geotechnical Investigation
PROJECT NAME	Halsey House
LOCATION	University Avenue and University Terrace Los Altos, California
CLIENT	David J. Powers & Associates
PROJECT NUMBER	118-161-1
DATE	February 16, 2024





CORNERSTONE EARTH GROUP

Type of Services	Geotechnical Investigation
Project Name	Halsey House
Location	University Avenue and University Terrace Los Altos, California
Client	David J. Powers & Associates
Client Address	1871 The Alameda, Suite 200 San Jose, California
Project Number	118-161-1
Date	February 16, 2024

Prepared by

Jesse D. Serpa, E.I.T.
Senior Staff Engineer

Stephen C. Ohlsen, P.E., G.E.
Senior Project Engineer
Geotechnical Project Manager



TABLE OF CONTENTS

SECTION 1: INTRODUCTION	1
1.1 Project Description-----	1
1.2 Scope of Services-----	1
1.3 Exploration Program -----	2
1.4 Laboratory Testing Program-----	2
1.5 Environmental Services -----	2
SECTION 2: REGIONAL SETTING.....	2
2.1 Geological Setting -----	2
2.2 Regional Seismicity-----	2
Table 1: Approximate Fault Distances	3
SECTION 3: SITE CONDITIONS	3
3.1 Site Background-----	3
3.2 Surface Description-----	3
3.3 Subsurface Conditions-----	4
3.3.1 In-Situ Moisture Contents.....	4
3.4 Groundwater -----	4
SECTION 4: GEOLOGIC HAZARDS.....	4
4.1 Fault Surface Rupture -----	4
4.2 Estimated Ground Shaking -----	5
4.3 Liquefaction Potential -----	5
4.3.1 Background.....	5
4.3.2 Analysis	5
4.3.3 Summary	6
4.3.4 Ground Deformation and Surficial Cracking Potential.....	6
4.4 Lateral Spreading -----	7
4.5 Seismic Settlement/Unsaturated Sand Shaking -----	7
4.6 Tsunami/seiche-----	7
4.7 Flooding -----	8
SECTION 5: CONCLUSIONS	8
5.1 Summary-----	8
5.1.1 Potential for Liquefaction-Induced Settlements	8
5.1.2 Presence of Undocumented Fill and Redevelopment Considerations	9
5.1.3 Shallow Groundwater	9
5.2 Plans and Specifications Review-----	9
5.3 Construction Observation and Testing-----	9
SECTION 6: EARTHWORK	10
6.1 Site Demolition-----	10
6.1.1 Demolition of Existing Slabs, Foundations and Pavements	10
6.1.2 Abandonment of Existing Utilities	11

6.2	Site Clearing and Preparation-----	11
6.2.1	Site Stripping.....	11
6.2.2	Tree and Shrub Removal	11
6.3	Mitigation of Undocumented Fills-----	12
6.4	Temporary Cut and Fill Slopes -----	12
6.5	Subgrade Preparation -----	12
6.6	Wet Soil Stabilization Guidelines-----	12
6.6.1	Scarification and Drying	13
6.6.2	Removal and Replacement.....	13
6.6.3	Chemical Treatment.....	13
6.7	Material for Fill -----	13
6.7.1	Re-Use of On-site Soils.....	13
6.7.2	Potential Import Sources.....	13
6.8	Compaction Requirements -----	14
	Table 2: Compaction Requirements	15
6.9	Trench Backfill -----	15
6.10	Site Drainage-----	16
SECTION 7: 2022 CBC SEISMIC DESIGN CRITERIA.....		16
7.1	Seismic Design Criteria-----	16
	Table 3: CBC Site Categorization and Site Coefficients.....	17
SECTION 8: FOUNDATIONS.....		17
8.1	Summary of Recommendations -----	17
8.2	Shallow Foundations -----	17
8.2.1	Conventional Shallow Footings	17
8.2.2	Footing Settlement.....	18
	Table 4: Assumed Structural Loading.....	18
8.2.3	Lateral Loading	18
8.2.4	Conventional Shallow Footing Construction Considerations.....	18
8.3	Ground Anchors-----	19
SECTION 9: CONCRETE SLABS AND PEDESTRIAN PAVEMENTS		19
9.1	Interior Slabs-on-Grade-----	19
9.2	Interior Slabs Moisture Protection Considerations -----	20
9.3	Exterior Flatwork -----	21
SECTION 10: LIMITATIONS		21
SECTION 11: REFERENCES		22

FIGURE 1: VICINITY MAP

FIGURE 2: SITE PLAN

FIGURE 3: REGIONAL FAULT MAP

FIGURE 4A TO 4C: LIQUEFACTION ANALYSIS SUMMARY – CPT-01 TO CPT-03

APPENDIX A: FIELD INVESTIGATION

APPENDIX B: LABORATORY TEST PROGRAM

Type of Services	Geotechnical Investigation
Project Name	Halsey House
Location	University Avenue and University Terrace Los Altos, California

SECTION 1: INTRODUCTION

This geotechnical report was prepared for the sole use of David J. Powers & Associates for the Halsey House project in Los Altos, California. The location of the site is shown on the Vicinity Map, Figure 1.

1.1 PROJECT DESCRIPTION

The project will consist of evaluating the existing Halsey House structure for rehabilitation or reconstruction. The original structure was built in 1923 and was primarily used as an education and recreational nature center until 2008, when it was then closed due to its deteriorating conditions. As a result of these conditions, the Halsey House structure has remained closed since 2008. The City of Los Altos has planned for the structure to be renovated for re-use, or to be demolished and reconstructed to replace the Halsey House with a purpose-designed facility. The structure is located within the approximately 6-acre Redwood Grove Nature Preserve. The Halsey House structure is reportedly built on a concrete foundation, is of wood-framed construction, has a clay tile roof, and has an approximate footprint of 3,400 square feet.

Structural loads are not currently known for the proposed structure; however, structural loads for rehabilitation or a new structure are expected to be relatively light and typical of similar type structures. Grading plans are not available at this time; however, as the current project scope focuses on the existing structure, grading is anticipated to consist of minor cuts and fills on the order of 1 to 3 feet to potentially facilitate the rehabilitation of the existing structure, which could include underpinning and the installation of new improvements such as flatwork and utilities. Therefore, the overall topography of the Preserve is expected to remain the same following this project.

1.2 SCOPE OF SERVICES

Our scope of services was presented in our proposal dated July 10, 2023, and consisted of field and laboratory programs to evaluate physical and engineering properties of the subsurface soils, engineering analysis to prepare recommendations for site work and grading, building

foundations, flatwork, and pavements, and preparation of this report. Brief descriptions of our exploration and laboratory programs are presented below.

1.3 EXPLORATION PROGRAM

Field exploration consisted of two borings drilled on January 23, 2024 with track-mounted, limited-access, hollow-stem auger drilling equipment, as well as three Cone Penetration Tests (CPTs) advanced on January 16, 2024. The borings were drilled to depths of 25 and 30 feet; the CPTs were each advanced to depths of 44½ feet. Seismic shear wave velocity measurements were collected from CPT-1. Borings EB-1 and EB-2 were advanced adjacent to CPT-1 and CPT-2, respectively, for direct evaluation of physical samples to correlated soil behavior. The borings and CPTs were backfilled with cement grout in accordance with local requirements.

The approximate locations of our exploratory borings are shown on the Site Plan, Figure 2. Details regarding our field program are included in Appendix A.

1.4 LABORATORY TESTING PROGRAM

In addition to visual classification of samples, the laboratory program focused on obtaining data for foundation design and seismic ground deformation estimates. Testing included moisture contents, dry densities, and washed sieve analyses. Details regarding our laboratory program are included in Appendix B.

1.5 ENVIRONMENTAL SERVICES

Environmental services were not requested for this project. If environmental concerns are determined to be present during future evaluations, the project environmental consultant should review our geotechnical recommendations for compatibility with the environmental concerns.

SECTION 2: REGIONAL SETTING

2.1 GEOLOGICAL SETTING

The site is located within the Santa Clara Valley, which is a broad alluvial plane between the Santa Cruz Mountains to the southwest and west, and the Diablo Range to the northeast. The San Andreas Fault system, including the Monte Vista-Shannon Fault, exists within the Santa Cruz Mountains and the Hayward and Calaveras Fault systems exist within the Diablo Range. Alluvial soil thicknesses in the project area have been mapped at less than 100 feet (Rogers & Williams, 1974).

2.2 REGIONAL SEISMICITY

While seismologists cannot predict earthquake events, geologists from the U.S. Geological Survey have recently updated (in 2015) earlier estimates from their 2014 Uniform California Earthquake Rupture Forecast (Version 3; UCERF3) publication. The estimated probability of

one or more magnitude 6.7 earthquakes (the size of the destructive 1994 Northridge earthquake) expected to occur somewhere in the San Francisco Bay Area has been revised (increased) to 72 percent for the period 2014 to 2043 (Aagaard et al., 2016). The faults in the region with the highest estimated probability of generating damaging earthquakes between 2014 and 2043 are the Hayward (33%), Calaveras (26%), and San Andreas Faults (22%). In this 30-year period, the probability of an earthquake of magnitude 6.7 or larger occurring is 22 percent along the San Andreas Fault and 33 percent for the Hayward Fault.

The faults considered capable of generating significant earthquakes are generally associated with the well-defined areas of crustal movement, which trend northwesterly. The table below presents the State-considered active faults within 25 kilometers of the site.

Table 1: Approximate Fault Distances

Fault Name	Distance	
	(miles)	(kilometers)
Monte Vista-Shannon	2.7	4.3
San Andreas (1906)	4.3	7.0
Hayward (Southeast Extension)	13.7	22.0
Hayward (Total Length)	15.4	24.8

A regional fault map is presented as Figure 3, illustrating the relative distances of the site to significant fault zones.

SECTION 3: SITE CONDITIONS

3.1 SITE BACKGROUND

As mentioned above, the Halsey House was originally constructed in 1923. We reviewed historic aerial imagery provided online by Historic Aerials (historicaerials.com). A summary of pertinent surface changes at and near the site is as follows:

- 1948: The existing Halsey House structure is observed and the residential development to the north and east of the project site appears to have been constructed by this time. The Halsey House structure is bounded by agricultural fields to the west and south.
- 1980: Additional residential development is constructed to the west of the project site.
- 1997: Residential development to the south of the project site appears completed. No pertinent changes were observed since this image.

3.2 SURFACE DESCRIPTION

As noted above, the existing historic Halsey House is located within the Redwood Grove Nature Preserve. The Preserve is generally characterized by gentle slopes and plentiful mature trees and vegetation, with dirt and gravel walking trails present throughout. The Preserve appears to

generally slope downwards to the north, and the Halsey House structure is situated within the southern section of the Preserve. The current Adobe Creek runs approximately 50 feet north of the Halsey House. Grades around the property range from Elevation 212 feet to the south to Elevation 206 feet to the north. Numerous mature trees are present within the Preserve and the immediate vicinity of the Halsey House.

3.3 SUBSURFACE CONDITIONS

Below the surficial topsoil, our explorations generally encountered undocumented fill consisting of sandy lean clay to a depth of up to 1 foot. Beneath the undocumented fill, Boring EB-1 generally encountered native stiff to hard sandy lean clay down to a depth of 14½ feet, underlain by medium dense to dense clayey sand with variable amounts of clay and gravel to 21½ feet and very stiff lean clay to 23½ feet before terminating in dense clayey sand at a depth of 25 feet. Beneath the undocumented fill Boring EB-2 generally encountered native stiff sandy lean clay to a depth of 3 feet, underlain by medium dense to dense clayey sands with variable amounts of clay and gravel down to 30 feet, the maximum boring depth.

Beneath the terminal boring depths, our CPTs generally encountered interbedded dense sands and hard clays to the maximum depth explored of 44½ feet.

3.3.1 In-Situ Moisture Contents

Laboratory testing indicated that the in-situ moisture contents within the upper 10 feet range from 3 percent under to 5 percent over the estimated laboratory optimum moisture.

3.4 GROUNDWATER

Groundwater was encountered in our explorations EB-1 and EB-2 at depths ranging from 10 to 15 feet below current grades. All measurements were taken at the time of drilling and may not represent the stabilized levels that can vary from the initial levels encountered.

Based on the above, we recommend a design groundwater depth of 8 feet. Fluctuations in groundwater levels occur due to many factors including seasonal fluctuation, underground drainage patterns, regional fluctuations, and other factors.

SECTION 4: GEOLOGIC HAZARDS

4.1 FAULT SURFACE RUPTURE

As discussed above several significant faults are located within 25 kilometers of the site. The site is not located within a State-designated Alquist Priolo Earthquake Fault Zone, or a Santa Clara County Fault Hazard Zone. As shown in Figure 3, no known surface expression of fault traces is thought to cross the site; therefore, fault surface rupture hazard is not a significant geologic hazard at the site.

4.2 ESTIMATED GROUND SHAKING

Moderate to severe (design-level) earthquakes can cause strong ground shaking, which is the case for most sites within the Bay Area. A peak ground acceleration (PGA) was estimated for analysis using a value equal to $F_{PGA} \times PGA$, as allowed in the 2022 edition of the California Building Code when an exception has been taken per ASCE 7-16, Section 11.4.8. For our liquefaction analysis we used a PGA_M of 1.112g.

4.3 LIQUEFACTION POTENTIAL

The site is within a State-designated Liquefaction Hazard Zone (CGS, Cupertino 7.5-Minute Quadrangle, 2002) as well as a Santa Clara County Liquefaction Hazard Zone (Santa Clara County, 2003). Our field and laboratory programs addressed this issue by testing and sampling potentially liquefiable layers to maximum depths explored, performing visual classification on sampled materials, evaluating CPT data, and performing various tests to further classify soil properties.

4.3.1 Background

During strong seismic shaking, cyclically induced stresses can cause increased pore pressures within the soil matrix that can result in liquefaction triggering, soil softening due to shear stress loss, potentially significant ground deformation due to settlement within sandy liquefiable layers as pore pressures dissipate, and/or flow failures in sloping ground or where open faces are present (lateral spreading) (NCEER 1998). Limited field and laboratory data is available regarding ground deformation due to settlement; however, in clean sand layers settlement on the order of 2 to 4 percent of the liquefied layer thickness can occur. Soils most susceptible to liquefaction are loose, non-cohesive soils that are saturated and are bedded with poor drainage, such as sand and silt layers bedded with a cohesive cap.

4.3.2 Analysis

As discussed in the “Subsurface” section above, several sand layers were encountered below the design groundwater depth of 8 feet. Following the liquefaction analysis framework in the 2008 monograph, *Soil Liquefaction During Earthquakes* (Idriss and Boulanger, 2008), incorporating updates in *CPT and SPT Based Liquefaction Triggering Procedures* (Boulanger and Idriss, 2014), and in accordance with CDMG Special Publication 117A guidelines (CDMG, 2008) for quantitative analysis, these layers were analyzed for liquefaction triggering and potential post-liquefaction settlement. These methods compare the ratio of the estimated cyclic shaking (Cyclic Stress Ratio - CSR) to the soil’s estimated resistance to cyclic shaking (Cyclic Resistance Ratio - CRR), providing a factor of safety against liquefaction triggering. Factors of safety less than or equal to 1.3 are considered to be potentially liquefiable and capable of post-liquefaction re-consolidation (i.e. settlement).

The CSR for each layer quantifies the stresses anticipated to be generated due to a design-level seismic event, is based on the peak horizontal acceleration generated at the ground surface discussed in the “Estimated Ground Shaking” section above, and is corrected for

overburden and stress reduction factors as discussed in the procedure developed by Seed and Idriss (1971) and updated in the 2008 Idriss and Boulanger monograph.

In estimating post-liquefaction settlement at the site, we have implemented a depth weighting factor proposed by Cetin (2009). Following evaluation of 49 high-quality, cyclically induced, ground settlement case histories from seven different earthquakes, Cetin proposed the use of a weighting factor based on the depth of layers. The weighting procedure was used to tune the surface observations at liquefaction sites to produce a better model fit with measured data. Aside from the better model fit it produced, the rationale behind the use of a depth weighting factor is based on the following: 1) upward seepage, triggering void ratio redistribution, and resulting in unfavorably higher void ratios for the shallower sublayers of soil layers; 2) reduced induced shear stresses and number of shear stress cycles transmitted to deeper soil layers due to initial liquefaction of surficial layers; and 3) possible arching effects due to nonliquefied soil layers. All these may significantly reduce the contribution of volumetric settlement of deeper soil layers to the overall ground surface settlement (Cetin, 2009).

The soil's CRR is estimated from the in-situ measurements from CPTs and laboratory testing on samples retrieved from our borings. SPT "N" values obtained from hollow-stem auger borings were not used in our analyses, as the "N" values obtained are less reliable in sands below groundwater. The tip pressures are corrected for effective overburden stresses, taking into consideration both the groundwater level at the time of exploration and the design groundwater level, and stress reduction versus depth factors. The CPT method utilizes the soil behavior type index (I_c) to estimate the plasticity of the layers.

The results of our CPT analyses (CPT-1 through CPT-3) are presented in Figures 4A through 4C of this report.

4.3.3 Summary

Our analyses indicate that several layers could potentially experience liquefaction triggering that could result in post-liquefaction total settlement at the ground surface ranging up to $\frac{3}{8}$ -inch based on the Yoshimine (2006) method. As discussed in SP 117A, differential movement for level ground sites over deep soil sites will be up to about two-thirds of the total settlement between independent foundation elements. In our opinion, differential settlements are anticipated to be on the order of up to $\frac{1}{2}$ -inch over a horizontal distance of 30 feet.

4.3.4 Ground Deformation and Surficial Cracking Potential

The methods used to estimate liquefaction settlements assume that there is a sufficient cap of non-liquefiable material to prevent ground deformation or sand boils. For ground deformation to occur, the pore water pressure within the liquefiable soil layer will need to be great enough to break through the overlying non-liquefiable layer, which could cause significant ground deformation and settlement. The work of Youd and Garriss (1995) indicates that the 25-foot thick layer of non-liquefiable cap is sufficient to prevent ground deformation and significant surficial cracking; therefore, the above total settlement estimates are reasonable.

4.4 LATERAL SPREADING

Lateral spreading is horizontal/lateral ground movement of relatively flat-lying soil deposits towards a free face such as an excavation, channel, or open body of water; typically, lateral spreading is associated with liquefaction of one or more subsurface layers near the bottom of the exposed slope. As failure tends to propagate as block failures, it is difficult to analyze and estimate where the first tension crack will form.

The current Adobe Creek runs approximately 50 feet north of the Halsey House. The channel bottom was observed to be roughly 6 to 7 feet deep relative to the existing adjacent site grades. As part of our liquefaction analyses, we calculated the Lateral Displacement Index (LDI) for potentially liquefiable layers based on methods presented in the 2008 monograph, *Soil Liquefaction During Earthquakes* (Idriss and Boulanger, 2008). LDI is a summation of the maximum shear strains versus depth, which is a measurement of the potential maximum displacement at that exploration location. Summations of the LDI values to a depth equal to twice the open face height were included. Estimated displacements in the vicinity of CPT-1 through CPT-3 based on the LDI calculations are considered negligible.

We also reviewed the historical ground failure map presented in the Seismic Hazard Zone Report for the vicinity (CGS, Cupertino 7.5-Minute Quadrangle, 2002), which indicated no occurrences of lateral spread within the project site vicinity. Therefore, in our opinion, the potential for lateral spreading to impact the project is relatively low.

4.5 SEISMIC SETTLEMENT/UNSATURATED SAND SHAKING

Loose unsaturated sandy soils can settle during strong seismic shaking. We evaluated the potential for seismic compaction of the loose to medium dense sands based on the work by Robertson and Shao (2010). Based on our analyses, the potential for significant seismic settlement affecting the proposed improvements is low.

4.6 TSUNAMI/SEICHE

The terms tsunami or seiche are described as ocean waves or similar waves usually created by undersea fault movement or by a coastal or submerged landslide. Tsunamis may be generated at great distance from shore (far field events) or nearby (near field events). Waves are formed, as the displaced water moves to regain equilibrium, and radiates across the open water, similar to ripples from a rock being thrown into a pond. When the waveform reaches the coastline, it quickly raises the water level, with water velocities as high as 15 to 20 knots. The water mass, as well as vessels, vehicles, or other objects in its path create tremendous forces as they impact coastal structures.

Tsunamis have affected the coastline along the Pacific Northwest during historic times. The Fort Point tide gauge in San Francisco recorded approximately 21 tsunamis between 1854 and 1964. The 1964 Alaska earthquake generated a recorded wave height of 7.4 feet and drowned eleven people in Crescent City, California. For the case of a far-field event, the Bay area would

have hours of warning; for a near field event, there may be only a few minutes of warning, if any.

A tsunami or seiche originating in the Pacific Ocean would lose much of its energy passing through San Francisco Bay. Based on the mapping of tsunami inundation potential for the San Francisco Bay Area by CGS (conservation.ca.gov/cgs/tsunami/maps), areas most likely to be inundated are marshlands, tidal flats, and former bay margin lands that are now artificially filled, but are still at or below sea level, and are generally within 1½ miles of the shoreline. The site is approximately 5¾ miles inland from the San Francisco Bay shoreline and is approximately 206 to 212 feet above mean sea level (WGS84). Therefore, the potential for inundation due to tsunami or seiche is considered low.

4.7 FLOODING

Based on our internet search of the Federal Emergency Management Agency (FEMA) flood map public database, the site is located within Zone AE, defined as a “Regulatory Floodway” and Zone A, with base flood elevations between 204 and 208. We recommend the project civil engineer be retained to confirm this information and verify the base flood elevation, if appropriate.

The Department of Water Resources (DWR), Division of Safety of Dams (DSOD) compiled a database of Dam Failure Inundation Hazard Maps (DSOD, 2015). The generalized hazard maps were prepared by dam owners as required by the State Office of Emergency Services; they are intended for planning purposes only. Based on our review of these maps, the site is not located within a dam failure inundation area.

SECTION 5: CONCLUSIONS

5.1 SUMMARY

From a geotechnical viewpoint, retrofitting the existing structure or building new facilities should both be feasible provided the concerns listed below are addressed in the project design. Descriptions of each concern with brief outlines of our recommendations follow the listed concerns.

- Potential for liquefaction-induced settlements
- Presence of undocumented fill and redevelopment considerations
- Presence of undocumented fill
- Shallow groundwater

5.1.1 Potential for Liquefaction-Induced Settlements

As discussed, our liquefaction analysis indicates that there is a potential for liquefaction of localized sand layers during a significant seismic event. Although the potential for liquefied sands to vent to the ground surface through cracks in the surficial soils is low, our analysis

indicates that liquefaction-induced settlement on the order of up to $\frac{3}{8}$ -inch could occur, resulting in differential settlement up to $\frac{1}{2}$ -inch. New foundations should be designed to tolerate the anticipated total and differential settlements. Liquefaction does not appear to pose a severe risk to the structure; therefore, existing foundations should not be impacted to a degree that would necessitate replacement. Detailed foundation recommendations are presented in the “Foundations” section.

5.1.2 Presence of Undocumented Fill and Redevelopment Considerations

As discussed, the site is currently occupied by the existing Halsey House and appurtenant flatwork, site fixtures, and landscaping. We understand that the City is considering renovating the existing structure, which may include new foundation elements, or demolishing the existing structure and reconstructing a purpose-designed facility as a replacement. Potential issues that are often associated with new foundations or redeveloping sites include demolition of existing improvements, abandonment of existing utilities, and undocumented fills. As discussed, our borings generally encountered up to one foot of undocumented fill. Any undocumented fill encountered during site grading should be completely removed from within improvement areas and to a lateral distance equal to fill depth below the perimeter footing. Provided the fills meet the “Material for Fill” requirements below, the fills may be reused when backfilling the excavations. The existing fill should not affect the performance of the existing structure, and should not impact new improvements provided the recommendations in this report to remove and replace the undocumented fill as engineered fill are followed. Please refer to the “Earthwork” section below for further recommendations.

5.1.3 Shallow Groundwater

Shallow groundwater was measured at depths ranging from approximately 10 to 15 feet below the existing ground surface. As discussed above, we recommend a design groundwater depth of 8 feet. Our experience with similar sites in the vicinity indicates that shallow groundwater could significantly impact grading and underground construction, depending on the depth of excavations. These impacts typically consist of potentially wet and unstable subgrade, difficulty achieving compaction, and difficult underground utility installation. Dewatering and shoring of utility trenches may be required in some isolated areas of the site. Shallow groundwater should not impact the performance of the existing structure. Detailed recommendations addressing this concern are presented in the “Earthwork” section of this report.

5.2 PLANS AND SPECIFICATIONS REVIEW

We recommend that we be retained to review the geotechnical aspects of the project structural, civil, and landscape plans and specifications, allowing sufficient time to provide the design team with any comments prior to issuing the plans for construction.

5.3 CONSTRUCTION OBSERVATION AND TESTING

As site conditions may vary significantly between the small-diameter borings performed during this investigation, we also recommend that a Cornerstone representative be present to provide

geotechnical observation and testing during earthwork and foundation construction. This will allow us to form an opinion and prepare a letter at the end of construction regarding contractor compliance with project plans and specifications, and with the recommendations in our report. We will also be allowed to evaluate any conditions differing from those encountered during our investigation and provide supplemental recommendations as necessary. For these reasons, the recommendations in this report are contingent of Cornerstone providing observation and testing during construction. Contractors should provide at least a 48-hour notice when scheduling our field personnel.

SECTION 6: EARTHWORK

6.1 SITE DEMOLITION

If renovation and seismic retrofit of the existing structure is planned, the areas designated for improvements should be cleared of all surface and subsurface deleterious materials including any pre-existing foundations, flatwork, pavements, utilities, and other improvements, if encountered. If the existing structure will be removed and reconstructed as a purpose-designed facility, all existing improvements not to be reused for the development should be demolished and removed from the site. Excavations extending below the planned finished improvement grades should be cleaned and backfilled with suitable material compacted to the recommendations in the “Compaction” section of this report.

Cornerstone should be notified prior to the start of demolition and should be present on at least a part-time basis during all backfill and mass grading as a result of demolition. Occasionally, other types of buried structures (wells, cisterns, debris pits, etc.) can be found on sites with prior development. If encountered, Cornerstone should be contacted to address these types of structures on a case-by-case basis.

6.1.1 Demolition of Existing Slabs, Foundations and Pavements

All slabs and foundations not designated for reuse should be completely removed from within planned building areas.

Special care should be taken during the demolition and removal of existing floor slabs, foundations, utilities, and pavements to minimize disturbance of the subgrade. Excessive disturbance of the subgrade, which includes either native or previously placed engineered fill, resulting from demolition activities can have serious detrimental effects on planned foundation and paving elements.

Existing foundations are typically mat-slabs, shallow footings, or piers/piles. If slab or shallow footings are encountered, they should be completely removed. If drilled piers are encountered, they should be cut off at an elevation at least 60-inches below proposed footings or the final subgrade elevation, whichever is deeper. The remainder of the drilled pier could remain in place. Foundation elements to remain in place should be surveyed and superimposed on the proposed development plans to determine the potential for conflicts or detrimental impacts to

the planned construction. Following review, additional mitigation or planned foundation elements may need to be modified.

6.1.2 Abandonment of Existing Utilities

All utilities not designated for reuse should be completely removed from within planned building areas. For any utility line to be considered acceptable to remain within building areas, the utility line must be completely backfilled with grout or sand-cement slurry (sand slurry is not acceptable), the ends outside the building area capped with concrete, and the trench fills either removed and replaced as engineered fill with the trench side slopes flattened to at least 1:1, or the trench fills are determined not to be a risk to the structure. The assessment of the level of risk posed by the particular utility line will determine whether the utility may be abandoned in place or needs to be completely removed. The contractor should assume that all utilities will be removed from within building areas unless provided written confirmation from both the owner and the geotechnical engineer.

Utilities extending beyond the building area may be abandoned in place provided the ends are plugged with concrete, they do not conflict with planned improvements, and that the trench fills do not pose significant risk to the planned surface improvements.

The risk for owners associated with abandoning utilities in place include the potential for future differential settlement of existing trench fills, and/or partial collapse and potential ground loss into utility lines that are not completely filled with grout.

6.2 SITE CLEARING AND PREPARATION

6.2.1 Site Stripping

The site should be stripped of all surface vegetation, and surface and subsurface improvements to be removed within the proposed development area. Demolition of existing improvements is discussed in the prior paragraphs. Surface vegetation and topsoil should be stripped to a sufficient depth to remove all material greater than 3 percent organic content by weight. Based on our site observations, surficial stripping should extend about 3 to 6 inches below existing grade in vegetated areas.

6.2.2 Tree and Shrub Removal

Trees and shrubs designated for removal should have the root balls and any roots greater than ½-inch diameter removed completely. Mature trees are estimated to have root balls extending to depths of 2 to 4 feet, depending on the tree size. Significant root zones are anticipated to extend to the diameter of the tree canopy. Grade depressions resulting from root ball removal should be cleaned of loose material and backfilled in accordance with the recommendations in the “Compaction” section of this report.

6.3 MITIGATION OF UNDOCUMENTED FILLS

Undocumented fill was encountered in our Boring EB-1 and EB-2 ranging from approximately ½ to 1 foot. All undocumented fills should be completely removed from within proposed improvement areas and to a lateral distance of at least equal to fill depth below the perimeter footing, whichever is greater. Provided the fills meet the “Material for Fill” requirements below, the fills may be reused when backfilling the excavations. Based on review of the samples collected from our borings, it appears that the fill may be reused. If materials are encountered that do not meet the requirements, such as debris, wood, trash, those materials should be screened out of the remaining material and be removed from the site. Backfill of excavations should be placed in lifts and compacted in accordance with the “Compaction” section below.

Fills extending into planned pavement and flatwork areas may be left in place provided they are determined to be a low risk for future differential settlement and that the upper 12 to 18 inches of fill below pavement subgrade is re-worked and compacted as discussed in the “Compaction” section below. In our opinion, the fills encountered at this site are acceptable to be left in place beneath planned new pavement and flatwork.

6.4 TEMPORARY CUT AND FILL SLOPES

The contractor is responsible for maintaining all temporary slopes and providing temporary shoring where required. Temporary shoring, bracing, and cuts/fills should be performed in accordance with the strictest government safety standards. On a preliminary basis, the upper 10 feet at the site may be classified as OSHA Soil Type C materials.

Excavations performed during site demolition and fill removal should be sloped at 2:1 (horizontal:vertical) within the upper 5 feet below building subgrade. Actual excavation inclinations should be reviewed in the field during construction, as needed. Excavations below building subgrade and excavations in pavement and flatwork areas should be sloped in accordance with OSHA soil classification requirements.

6.5 SUBGRADE PREPARATION

After the areas designated for improvements have been properly cleared, stripped and necessary excavations have been made, the exposed surface soils in those areas to receive fills, slabs-on-grade, and/or pavements should be scarified to a depth of 6 inches, moisture conditioned, and compacted in accordance with the “Compaction” section below.

6.6 WET SOIL STABILIZATION GUIDELINES

Native soil and fill materials, especially soils with high fines contents such as clays and silty soils, can become unstable due to high moisture content, whether from high in-situ moisture contents or from winter rains. As the moisture content increases over the laboratory optimum, it becomes more likely the materials will be subject to softening and yielding (pumping) from construction loading or become unworkable during placement and compaction.

As discussed in the “Subsurface” section in this report, the in-situ moisture contents can range up to 15 percent over the estimated laboratory optimum in the upper 10 of the soil profile. The contractor should anticipate drying any overly wet soils prior to reusing them as fill. In addition, repetitive rubber-tire loading will likely de-stabilize the overly wet soils.

There are several methods to address potential unstable soil conditions and facilitate fill placement and trench backfill. Some of the methods are briefly discussed below. Implementation of the appropriate stabilization measures should be evaluated on a case-by-case basis according to the project construction goals and the site conditions.

6.6.1 Scarification and Drying

The subgrade may be scarified to a depth of 6 to 12 inches and allowed to dry to near optimum conditions, if sufficient dry weather is anticipated to allow sufficient drying. More than one round of scarification may be needed to break up the soil clods.

6.6.2 Removal and Replacement

As an alternative to scarification, the contractor may choose to over-excavate the unstable soils and replace them with dry on-site or import materials. A Cornerstone representative should be present to provide recommendations regarding the appropriate depth of over-excavation, whether a geosynthetic (stabilization fabric or geogrid) is recommended, and what materials are recommended for backfill.

6.6.3 Chemical Treatment

Where the unstable area exceeds about 5,000 to 10,000 square feet and/or site winterization is desired, chemical treatment with quicklime (CaO), kiln-dust, or cement may be more cost-effective than removal and replacement. Recommended chemical treatment depths will typically range from 12 to 18 inches depending on the magnitude of the instability.

6.7 MATERIAL FOR FILL

6.7.1 Re-Use of On-site Soils

On-site soils with an organic content less than 3 percent by weight may be reused as general fill. General fill should not have lumps, clods, or cobble pieces larger than 6 inches in diameter; 85 percent of the fill should be smaller than 2½ inches in diameter. Minor amounts of oversized material (smaller than 12 inches in diameter) may be allowed provided the oversized pieces are not allowed to nest together and the compaction method will allow for loosely placed lifts not exceeding 12 inches.

6.7.2 Potential Import Sources

Imported and non-expansive material should be inorganic with a Plasticity Index (PI) of 15 or less, and not contain recycled asphalt concrete where it will be used within the habitable

building areas. To prevent significant caving during trenching or foundation construction, imported material should have sufficient fines. Samples of potential import sources should be delivered to our office at least 10 days prior to the desired import start date. Information regarding the import source should be provided, such as any site geotechnical reports. If the material will be derived from an excavation rather than a stockpile, potholes will likely be required to collect samples from throughout the depth of the planned cut that will be imported. At a minimum, laboratory testing will include PI tests. Material data sheets for select fill materials (Class 2 aggregate base, ¾-inch crushed rock, quarry fines, etc.) listing current laboratory testing data (not older than 6 months from the import date) may be provided for our review without providing a sample. If current data is not available, specification testing will need to be completed prior to approval.

Environmental and soil corrosion characterization should also be considered by the project team prior to acceptance. Suitable environmental laboratory data to the planned import quantity should be provided to the project environmental consultant; additional laboratory testing may be required based on the project environmental consultant's review. The potential import source should also not be more corrosive than the on-site soils, based on pH, saturated resistivity, and soluble sulfate and chloride testing.

6.8 COMPACTION REQUIREMENTS

All fills, and subgrade areas where fill, slabs-on-grade, and pavements are planned, should be placed in loose lifts 8 inches thick or less and compacted in accordance with ASTM D1557 (latest version) requirements as shown in the table below. In general, clayey soils should be compacted with sheepsfoot equipment and sandy/gravelly soils with vibratory equipment; open-graded materials such as crushed rock should be placed in lifts no thicker than 18 inches and consolidated in place with vibratory equipment. Each lift of fill and all subgrade should be firm and unyielding under construction equipment loading in addition to meeting the compaction requirements to be approved. The contractor (with input from a Cornerstone representative) should evaluate the in-situ moisture conditions, as the use of vibratory equipment on soils with high moistures can cause unstable conditions. General recommendations for soil stabilization are provided in the "Wet Soil Stabilization Guidelines" section of this report.

Table 2: Compaction Requirements

Description	Material Description	Minimum Relative ¹ Compaction (percent)	Moisture ² Content (percent)
General Fill (within upper 5 feet)	On-Site Soils	90	>1
General Fill (below a depth of 5 feet)	On-Site Soils	95	>1
Trench Backfill	On-Site Soils	90	>1
Trench Backfill (upper 6 inches of subgrade)	On-Site Soils	95	>1
Crushed Rock Fill	¾-inch Clean Crushed Rock	Consolidate In-Place	NA
Non-Expansive Fill	Imported Non-Expansive Fill	90	Optimum
Flatwork Subgrade	On-Site Soils	90	>1
Flatwork Aggregate Base	Class 2 Aggregate Base ³	90	Optimum
Pavement Subgrade	On-Site Soils	95	>1
Pavement Aggregate Base	Class 2 Aggregate Base ³	95	Optimum
Asphalt Concrete	Asphalt Concrete	95 (Marshall)	NA

1 – Relative compaction based on maximum density determined by ASTM D1557 (latest version)

2 – Moisture content based on optimum moisture content determined by ASTM D1557 (latest version)

3 – Class 2 aggregate base shall conform to Caltrans Standard Specifications, latest edition, except that the relative compaction should be determined by ASTM D1557 (latest version)

6.9 TRENCH BACKFILL

Utility lines constructed within public right-of-way should be trenched, bedded and shaded, and backfilled in accordance with the local or governing jurisdictional requirements. Utility lines in private improvement areas should be constructed in accordance with the following requirements unless superseded by other governing requirements.

All utility lines should be bedded and shaded to at least 6 inches over the top of the lines with crushed rock (¾-inch-diameter or greater) or well-graded sand and gravel materials conforming to the pipe manufacturer's requirements. Open-graded shading materials should be consolidated in place with vibratory equipment and well-graded materials should be compacted to at least 90 percent relative compaction with vibratory equipment prior to placing subsequent backfill materials.

General backfill over shading materials may consist of on-site native materials provided they meet the requirements in the "Material for Fill" section, and are moisture conditioned and compacted in accordance with the requirements in the "Compaction" section.

Where utility lines will cross perpendicular to strip footings, the footing should be deepened to encase the utility line, providing sleeves or flexible cushions to protect the pipes from anticipated foundation settlement, or the utility lines should be backfilled to the bottom of footing with sand-

cement slurry or lean concrete. Where utility lines will parallel footings and will extend below the “foundation plane of influence,” an imaginary 1:1 plane projected down from the bottom edge of the footing, either the footing will need to be deepened so that the pipe is above the foundation plane of influence, or the utility trench will need to be backfilled with sand-cement slurry or lean concrete within the influence zone. Sand-cement slurry used within foundation influence zones should have a minimum compressive strength of 75 psi.

6.10 SITE DRAINAGE

Ponding should not be allowed adjacent to building foundations, slabs-on-grade, or pavements. Hardscape surfaces should slope at least 2 percent towards suitable discharge facilities; landscape areas should slope at least 3 percent to at least 10 feet from the structure. Roof runoff should be directed away from building areas in closed conduits, to approved infiltration facilities, or on to hardscaped surfaces that drain to suitable facilities. Retention, detention, or infiltration facilities should be spaced at least 10 feet from buildings, and preferably at least 5 feet from slabs-on-grade or pavements. However, if retention, detention, or infiltration facilities are located within these zones, we recommend that these treatment facilities meet the requirements in the Storm Water Treatment Design Considerations section of this report.

Where minimal side yards are planned (10 feet or less), we recommend that area drains collect surface runoff and transmit the runoff to other suitable landscape drainage facilities to prevent ponding adjacent to building foundations. Landscape drainage such as drain inlets and storm water filtration and/or infiltration trenches should be provided to collect and transmit storm water runoff to project storm drains, and/or detention or retention facilities.

SECTION 7: 2022 CBC SEISMIC DESIGN CRITERIA

7.1 SEISMIC DESIGN CRITERIA

We understand that the project structural design for a seismic retrofit or structure reconstruction will be based on the 2022 California Building Code (CBC), which provides criteria for the seismic design of buildings in Chapter 16. The “Seismic Coefficients” used to design buildings are established based on a series of tables and figures addressing different site factors, including the time-weighted average shear wave velocity of the top 100 feet (30 meters) of the soil profile (V_{S30}), and soil profile in the upper 100 feet below grade and mapped spectral acceleration parameters based on distance to the controlling seismic source/fault system.

Our explorations generally encountered stiff clay and medium dense to dense sand deposits to a depth of 44½ feet, the maximum depth explored. Shear wave velocity (V_s) measurements were performed while advancing CPT-1, resulting in a time-averaged shear wave velocity for the top 30 meters (V_{S30}) of 367 meters per second. Therefore, we have classified the site as Soil Classification C. The mapped spectral acceleration parameters S_s and S_1 were calculated using the web-based program ATC Hazards by Locations, located at <https://hazards.atcouncil.org/>, based on the site coordinates presented below and the site classification. Recommended values for design are presented in Table 3. The table below lists the various factors used to determine the seismic coefficients and other parameters.

Table 3: CBC Site Categorization and Site Coefficients

Classification/Coefficient	Design Value
Site Class	C
Site Latitude	37.372911°
Site Longitude	-122.119684°
0.2-second Period Mapped Spectral Acceleration ¹ , S_s	2.242g
1-second Period Mapped Spectral Acceleration ¹ , S_1	0.806g
Short-Period Site Coefficient – F_a	1.2
Long-Period Site Coefficient – F_v	1.4
0.2-second Period, Maximum Considered Earthquake Spectral Response Acceleration Adjusted for Site Effects – S_{MS}	2.69g
1-second Period, Maximum Considered Earthquake Spectral Response Acceleration Adjusted for Site Effects – S_{M1}	1.128g
0.2-second Period, Design Earthquake Spectral Response Acceleration – S_{DS}	1.794g
1-second Period, Design Earthquake Spectral Response Acceleration – S_{D1}	0.752g
Site Amplification Factor at PGA – F_{PGA}	1.2
Site Modified Peak Ground Acceleration – PGA_M	1.112g

SECTION 8: FOUNDATIONS

8.1 SUMMARY OF RECOMMENDATIONS

In our opinion, both a proposed remodel and seismic retrofit or a reconstructed structure may be supported on shallow foundations provided the recommendations in the “Earthwork” section and the sections below are followed. If ground anchors or other foundation types are desired, we should be retained to provide further recommendations as needed.

8.2 SHALLOW FOUNDATIONS

8.2.1 Conventional Shallow Footings

New conventional shallow footings should bear on natural, undisturbed soil or engineered fill, be at least 15 inches wide, and extend at least 12 inches below the lowest adjacent grade. Lowest adjacent grade is defined as the deeper of the following: 1) bottom of the adjacent interior slab-on-grade, or 2) finished exterior grade, excluding landscaping topsoil.

Footings constructed to the above dimensions and in accordance with the “Earthwork” recommendations of this report are capable of supporting maximum allowable bearing pressures of 2,500 psf for dead loads, 3,750 psf for combined dead plus live loads, and 5,000 psf for all loads including wind and seismic. These pressures are based on factors of safety of 3.0, 2.0, and 1.5 applied to the ultimate bearing pressure for dead, dead plus live, and all loads,

respectively. These pressures are net values; the weight of the footing may be neglected for the portion of the footing extending below grade (typically, the full footing depth). Top and bottom mats of reinforcing steel should be included in continuous footings to help span irregularities and differential settlement.

8.2.2 Footing Settlement

Structural loads were not provided to us at the time this report was prepared; therefore, we assumed the typical loading in the following table.

Table 4: Assumed Structural Loading

Foundation Area	Range of Assumed Loads
Isolated Column Footing	20 to 25 kips
Perimeter Strip Footing	1 to 3 kips per lineal foot

Based on the above loading and the allowable bearing pressures presented above, we estimate that the total static footing settlement will be on the order of $\frac{1}{3}$ -inch, with $\frac{1}{4}$ -inch or less of post-construction differential settlement between adjacent foundation elements. In addition, we estimate that differential seismic movement will be on the order of $\frac{1}{2}$ -inch over a horizontal distance of 30 feet, resulting in a total estimated differential footing movement of $\frac{3}{4}$ -inch between foundation elements, assumed to be on the order of 30 feet. As our footing loads were assumed, we recommend we be retained to review the final footing layout and loading, and verify the settlement estimates above.

8.2.3 Lateral Loading

Lateral loads may be resisted by friction between the bottom of footing and the supporting subgrade, and also by passive pressures generated against footing sidewalls. An ultimate frictional resistance of 0.40 applied to the footing dead load, and an ultimate passive pressure based on an equivalent fluid pressure of 450 pcf may be used in design. The structural engineer should apply an appropriate factor of safety (such as 1.5) to the ultimate values above. Where footings are adjacent to landscape areas without hardscape, the upper 12 inches of soil should be neglected when determining passive pressure capacity.

8.2.4 Conventional Shallow Footing Construction Considerations

Where utility lines will cross perpendicular to strip footings, the footing should be deepened to encase the utility line, providing sleeves or flexible cushions to protect the pipes from anticipated foundation settlement, or the utility lines should be backfilled to the bottom of footing with sand-cement slurry or lean concrete. Where utility lines will parallel footings and will extend below the "foundation plane of influence," an imaginary 1:1 plane projected down from the bottom edge of the footing, either the footing will need to be deepened so that the pipe is above the foundation plane of influence, or the utility trench will need to be backfilled with sand-cement slurry or lean

concrete within the influence zone. Sand-cement slurry used within foundation influence zones should have a minimum compressive strength of 75 psi.

Footing excavations should be filled as soon as possible or be kept moist until concrete placement by regular sprinkling to prevent desiccation. A Cornerstone representative should observe all footing excavations prior to placing reinforcing steel and concrete. If there is a significant schedule delay between our initial observation and concrete placement, we may need to re-observe the excavations.

8.3 GROUND ANCHORS

As discussed, we understand the City is considering a renovation and seismic retrofit for the existing Halsey House, which may include new foundation elements, or potentially new ground anchors to support new shear elements within the structure. Cuts adjacent to the existing slab or foundations should be properly supported to prevent soil from sloughing out from underneath the existing slab or footings. Excavations extending into the influence zone of existing foundations may need to be performed in sequence and may need to be underpinned depending on the specific situation. There are several methods that could be used to underpin existing footings, if needed. In our opinion, helical anchors or drilled piers could be used as ground anchors to support the existing foundations or new foundation elements. Helical anchors should be designed and installed by a helical anchor design build contractor.

Drilled piers may be used to provide additional uplift and vertical capacity. The piers should have a minimum diameter of 18 inches and extend to a depth of at least 10 feet below the surface. The vertical capacity may be designed based on an allowable skin friction of 200 pounds per square foot (psf) for the upper 5 feet and 500 psf for depths deeper than 5 feet. These allowable values are for combined dead plus live loads based on a factor of safety of 2.0; dead loads should not exceed two-thirds of the allowable capacities. The allowable skin friction may be increased by one-third for wind and seismic loads. Frictional resistance to uplift loads may be developed along the pier shafts based on 80 percent of the ultimate frictional resistance; the structural engineer should apply an appropriate factor of safety (such as 1.5) to the ultimate uplift capacity.

Cornerstone should review any proposed underpinning design prior to the start of construction and should be onsite while operations for underpinning or excavation in sequence beneath foundations are being performed.

SECTION 9: CONCRETE SLABS AND PEDESTRIAN PAVEMENTS

9.1 INTERIOR SLABS-ON-GRADE

As the Plasticity Index (PI) of the surficial soils is 15 or less, the proposed new areas of slabs-on-grade may be supported directly on subgrade prepared in accordance with the recommendations in the "Earthwork" section of this report. If moisture-sensitive floor coverings are planned, the recommendations in the "Interior Slabs Moisture Protection Considerations" section below may be incorporated in the project design if desired. If significant time elapses

between initial subgrade preparation and slab-on-grade construction, the subgrade should be proof-rolled to confirm subgrade stability, and if the soil has been allowed to dry out, the subgrade should be re-moisture conditioned to near optimum moisture content.

The structural engineer should determine the appropriate slab reinforcement for the loading requirements and consider the expansion potential of the underlying soils. For unreinforced concrete slabs, ACI 302.1R recommends limiting control joint spacing to 24 to 36 times the slab thickness in each direction, or a maximum of 18 feet.

9.2 INTERIOR SLABS MOISTURE PROTECTION CONSIDERATIONS

The following general guidelines for concrete slab-on-grade construction where floor coverings are planned are presented for consideration by the developer, design team, and contractor. These guidelines are based on information obtained from a variety of sources, including the American Concrete Institute (ACI) and are intended to reduce the potential for moisture-related problems causing floor covering failures, and may be supplemented as necessary based on project-specific requirements. The application of these guidelines or not will not affect the geotechnical aspects of the slab-on-grade performance.

- Place a minimum 15-mil vapor retarder conforming to ASTM E 1745, Class C requirements or better directly below the concrete slab; the vapor retarder should extend to the slab edges and be sealed at all seams and penetrations in accordance with manufacturer's recommendations and ASTM E 1643 requirements. A 4-inch-thick capillary break, consisting of crushed rock should be placed below the vapor retarder and consolidated in place with vibratory equipment. The mineral aggregate shall be of such size that the percentage composition by dry weight as determined by laboratory sieves will conform to the following gradation:

Sieve Size	Percentage Passing Sieve
1"	100
$\frac{3}{4}$ "	90 – 100
No. 4	0 – 10
No. 200	0 – 5

- The concrete water:cement ratio should be 0.45 or less. Mid-range plasticizers may be used to increase concrete workability and facilitate pumping and placement.
- Water should not be added after initial batching unless the slump is less than specified and/or the resulting water:cement ratio will not exceed 0.45.
- Polishing the concrete surface with metal trowels is not recommended.
- Where floor coverings are planned, all concrete surfaces should be properly cured.

- Water vapor emission levels and concrete pH should be determined in accordance with ASTM F1869-98 and F710-98 requirements and evaluated against the floor covering manufacturer's requirements prior to installation.

9.3 EXTERIOR FLATWORK

New exterior concrete flatwork subject to pedestrian and/or occasional light pick up loading should be at least 4 inches thick and supported on at least 4 inches of Class 2 aggregate base overlying subgrade prepared in accordance with the "Earthwork" recommendations of this report. Flatwork that will be subject to heavier or frequent vehicular loading should be designed in accordance with the recommendations in the "Vehicular Pavements" section below. To help reduce the potential for uncontrolled shrinkage cracking, adequate expansion and control joints should be included. Consideration should be given to limiting the control joint spacing to a maximum of about 2 feet in each direction for each inch of concrete thickness. Flatwork should be isolated from adjacent foundations or retaining walls except where limited sections of structural slabs are included to help span irregularities in retaining wall backfill at the transitions between at-grade and on-structure flatwork.

SECTION 10: LIMITATIONS

This report, an instrument of professional service, has been prepared for the sole use of David J. Powers & Associates specifically to support the design of the Halsey House project in Los Altos, California. The opinions, conclusions, and recommendations presented in this report have been formulated in accordance with accepted geotechnical engineering practices that exist in Northern California at the time this report was prepared. No warranty, expressed or implied, is made or should be inferred.

Recommendations in this report are based upon the soil and groundwater conditions encountered during our subsurface exploration. If variations or unsuitable conditions are encountered during construction, Cornerstone must be contacted to provide supplemental recommendations, as needed.

David J. Powers & Associates may have provided Cornerstone with plans, reports and other documents prepared by others. David J. Powers & Associates understands that Cornerstone reviewed and relied on the information presented in these documents and cannot be responsible for their accuracy.

Cornerstone prepared this report with the understanding that it is the responsibility of the owner or their representatives to see that the recommendations contained in this report are presented to other members of the design team and incorporated into the project plans and specifications, and that appropriate actions are taken to implement the geotechnical recommendations during construction.

Conclusions and recommendations presented in this report are valid as of the present time for the development as currently planned. Changes in the condition of the property or adjacent properties may occur with the passage of time, whether by natural processes or the acts of

other persons. In addition, changes in applicable or appropriate standards may occur through legislation or the broadening of knowledge. Therefore, the conclusions and recommendations presented in this report may be invalidated, wholly or in part, by changes beyond Cornerstone's control. This report should be reviewed by Cornerstone after a period of three (3) years has elapsed from the date of this report. In addition, if the current project design is changed, then Cornerstone must review the proposed changes and provide supplemental recommendations, as needed.

An electronic transmission of this report may also have been issued. While Cornerstone has taken precautions to produce a complete and secure electronic transmission, please check the electronic transmission against the hard copy version for conformity.

Recommendations provided in this report are based on the assumption that Cornerstone will be retained to provide observation and testing services during construction to confirm that conditions are similar to that assumed for design, and to form an opinion as to whether the work has been performed in accordance with the project plans and specifications. If we are not retained for these services, Cornerstone cannot assume any responsibility for any potential claims that may arise during or after construction as a result of misuse or misinterpretation of Cornerstone's report by others. Furthermore, Cornerstone will cease to be the Geotechnical-Engineer-of-Record if we are not retained for these services.

SECTION 11: REFERENCES

Aagaard, B.T., Blair, J.L., Boatwright, J., Garcia, S.H., Harris, R.A., Michael, A.J., Schwartz, D.P., and DiLeo, J.S., 2016, Earthquake outlook for the San Francisco Bay region 2014–2043 (ver. 1.1, August 2016): U.S. Geological Survey Fact Sheet 2016–3020, 6 p., <http://dx.doi.org/10.3133/fs20163020>.

ATC Hazards by Location, Hazards by Location, 2020, <https://hazards.atcouncil.org/>

ASCE 7-16. American Society of Civil Engineers. (2016). *Minimum Design Loads and Associated Criteria for Buildings and Other Structures*.

Boulanger, R.W. and Idriss, I.M., 2004, Evaluating the Potential for Liquefaction or Cyclic Failure of Silts and Clays, Department of Civil & Environmental Engineering, College of Engineering, University of California at Davis.

Boulanger, R.W. and Idriss, I.M., 2014, CPT and SPT Based Liquefaction Triggering Procedures, Department of Civil & Environmental Engineering, College of Engineering, University of California at Davis, Report No. UCD/GCM-14/01, April 2014

California Building Code, 2022, Structural Engineering Design Provisions, Vol. 2.

California Department of Conservation Division of Mines and Geology, 1998, Maps of Known Active Fault Near-Source Zones in California and Adjacent Portions of Nevada, International Conference of Building Officials, February, 1998.

California Division of Mines and Geology (2008), "Guidelines for Evaluating and Mitigating Seismic Hazards in California, Special Publication 117A, September.

California Geological Survey, 2002, State of California Seismic Hazard Zones, Cupertino 7.5-Minute Quadrangle, California: Seismic Hazard Zone Report 068.

CGS. (2021). *Earthquake Zones of Required Investigation*. CGS Homepage.
<https://maps.conservation.ca.gov/cgs/EQZApp/app/>

Cetin, K.O., Bilge, H.T., Wu, J., Kammerer, A.M., and Seed, R.B., Probabilistic Model for the Assessment of Cyclically Induced Reconsolidation (Volumetric) Settlements, ASCE Journal of Geotechnical and Geoenvironmental Engineering, Vol. 135, No. 3, March 1, 2009.

Federal Emergency Management Administration (FEMA), 2009, FIRM City of Los Altos, California, Community Panel #06085C0201H.

Idriss, I.M., and Boulanger, R.W., 2008, Soil Liquefaction During Earthquakes, Earthquake Engineering Research Institute, Oakland, CA, 237 p.

Ishihara, K., 1985, Stability of Natural Deposits During Earthquakes: Proceedings Eleventh International Conference on Soil Mechanics and Foundation Engineering, San Francisco.

Ishihara, K. and Yoshimine, M., 1992, Evaluation of Settlements in Sand Deposits Following Liquefaction During Earthquakes, Soils and Foundations, 32 (1): 173-188.

Kelson, K. I., Simpson, G. D., Lettis, W. R., and Harden, C. C., 1996, Holocene slip rate and recurrence of the northern Calaveras fault at Leyden Creek, eastern San Francisco Bay region, Journal of Geophysical Research, v. 101, No. B3, p. 5961-5975.

Knudsen et al., 2000, Preliminary Maps of Quaternary Deposits and Liquefaction Susceptibility, Nine-County San Francisco Bay Region, California.

Perkins, Moy and Lesser, 1988. Liability of Local Governments for Earthquake Hazards and Losses. Association of Bay Area Governments, Oakland, CA, pp. 114-116

Ritter, J.R., and Dupre, W.R., 1972, Map Showing Areas of Potential Inundation by Tsunamis in the San Francisco Bay Region, California: San Francisco Bay Region Environment and Resources Planning Study, USGS Basic Data Contribution 52, Misc. Field Studies Map MF-480.

Robertson, P.K., Shao, Lisheng, 2010, Estimation of Seismic Compression in Dry Soils Using the CPT, 5th International Conference on Recent Advances in Geotechnical Earthquake Engineering and Soil Dynamics, Paper No. 4.05a, May 24-29, 2010.

Rogers, T.H., and J.W. Williams, 1974 Potential Seismic Hazards in Santa Clara County, California, Special Report No. 107: California Division of Mines and Geology.

Seed, H.B. and I.M. Idriss, 1971, A Simplified Procedure for Evaluation soil Liquefaction Potential: JSMFC, ASCE, Vol. 97, No. SM 9, pp. 1249 – 1274.

Seed, Raymond B., Cetin, K.O., Moss, R.E.S., Kammerer, Ann Marie, Wu, J., Pestana, J.M., Riemer, M.F., Sancio, R.B., Bray, Jonathan D., Kayen, Robert E., and Faris, A., 2003, Recent Advances in Soil Liquefaction Engineering: A Unified and Consistent Framework., University of California, Earthquake Engineering Research Center Report 2003-06.

Tokimatsu, K., and Seed, H. Bolton, 1987, Evaluation of Settlements in Sands due to Earthquake Shaking, ASCE Journal of Geotechnical Engineering, Vol. 113, August 1987, pp. 861-878.

Witter, R.C., Knudsen, K.L., Sowers, J.M., Wentworth, C.M., Koehler, R.D., Randolph, C.E., Brooks, S. K. and Gans, K.D., 2006, Maps of Quaternary deposits and liquefaction susceptibility in the central San Francisco Bay region, California: U.S. Geological Survey, Open-File Report OF-2006-1037, scale 1:200000.

Working Group on California Earthquake Probabilities, 2015, [The Third Uniform California Earthquake Rupture Forecast](#), Version 3 (UCERF), U.S. Geological Survey Open File Report 2013-1165 (CGS Special Report 228). *KMZ files available at: www.scec.org/ucerf/images/ucerf3_timedep_30yr_probs.kmz*

Yoshimine, M., Nishizaki, H., Amano, KI, and Hosono, Y., 2006, Flow Deformation of Liquefied Sand Under Constant Shear Load and Its Application to Analysis of Flow Slide in Infinite Slope, Soil Dynamics and Earthquake Eng. 26, 253-264.

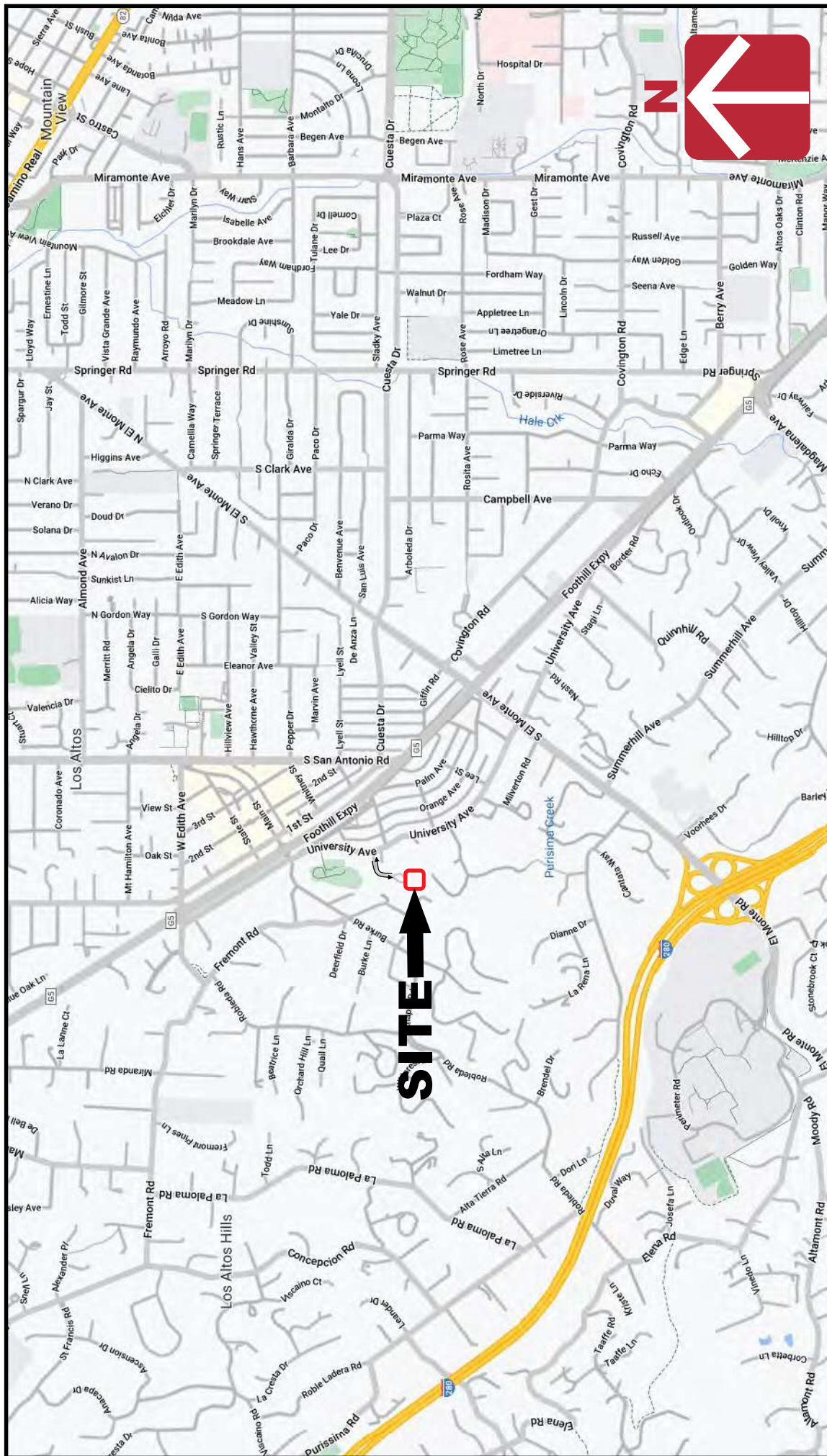
Youd, T.L. and C.T. Garris, 1995, Liquefaction-Induced Ground-Surface Disruption: Journal of Geotechnical Engineering, Vol. 121, No. 11, pp. 805 - 809.

Youd, T.L. and Idriss, I.M., et al, 1997, Proceedings of the NCEER Workshop on Evaluation of Liquefaction Resistance of Soils: National Center for Earthquake Engineering Research, Technical Report NCEER - 97-0022, January 5, 6, 1996.

Youd et al., 2001, "Liquefaction Resistance of Soils: Summary Report from the 1996 NCEER and 1998 NCEER/NSF Workshops on Evaluation of Liquefaction Resistance of Soils," ASCE Journal of Geotechnical and Geoenvironmental Engineering, Vo. 127, No. 10, October, 2001.

Youd, T. Leslie, Hansen, Corbett M., and Bartlett, Steven F., 2002, Revised Multilinear Regression Equations for Prediction of Lateral Spread Displacement: ASCE Journal of Geotechnical and Geoenvironmental Engineering, Vol. 128, December 2002, p 1007-1017.

Youd, T.L. and Hoose, S.N., 1978, Historic Ground Failures in Northern California Triggered by Earthquakes, United States Geologic Survey Professional Paper 993.

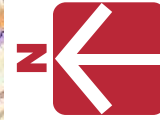
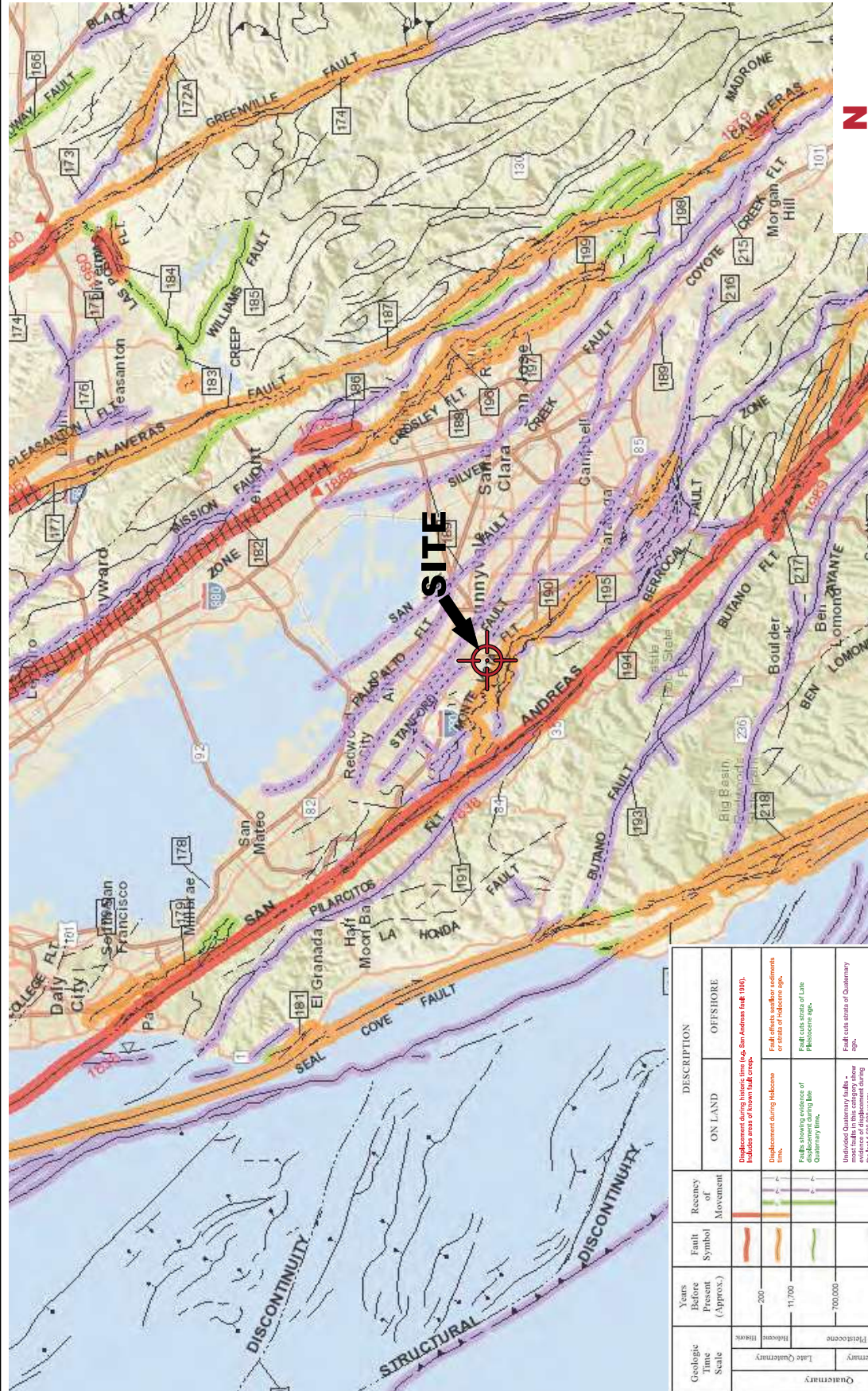


Project Number	118-161-1
Figure Number	Figure 1
Date	January 2024
Drawn By	RRN

Vicinity Map
Halsey House Los Altos, CA


CORNERSTONE
EARTH GROUP





Geologic Time Scale	Years Before Present (Approx.)	Fault Symbol	Recovery of Movement	DESCRIPTION	
				ON LAND	OFFSHORE
Quaternary	200			Displacement during historic time (e.g., San Andreas fault 1906), Pleistocene strata of latest Holocene age.	
	11,720			Displacement during Holocene time.	Fault offsets neither sediments or strata of Holocene age.
	700,000			Faults showing evidence of displacement during late Quaternary time.	Fault cuts strata of Late Pleistocene age.
Pleistocene	16,000,000			Unsubstantiated Quaternary faults showing evidence of displacement above most faults in this category above possible exceptions are faults undifferentiated from Holocene age.	Fault cuts strata of Quaternary age.
	4.5 billion			Faults without recognized showing evidence of no displacement during Quaternary time. Not necessarily inactive.	Fault cuts strata of Pleistocene or older age.

Base by California Geological Survey - 2010 Fault Activity Map of California (Jennings and Bryant, 2010)

© 2014 Cornerstone Earth Group, Inc.

PROJECT/CPT DATA

Project Title **Halsey House**

Project No. **118-161-1**

Project Manager **SCO**
SEISMIC PARAMETERS

Controlling Fault **San Andreas**

Earthquake Magnitude (Mw) **7.6**

PGA (Amax) **1.02** (g)

SITE SPECIFIC PARAMETERS

Ground Water Depth at Time of Drilling (feet) **20**

Design Water Depth (feet) **8**

Ave. Unit Weight Above GW (pcf) **120**

Ave. Unit Weight Below GW (pcf) **125**
CPT ANALYSIS RESULTS

DRY SAND SETTLEMENT FROM **8** FEET

0.00 (Inches)

LIQUEFACTION SETTLEMENT FROM **50** FEET

0.33 (Inches)

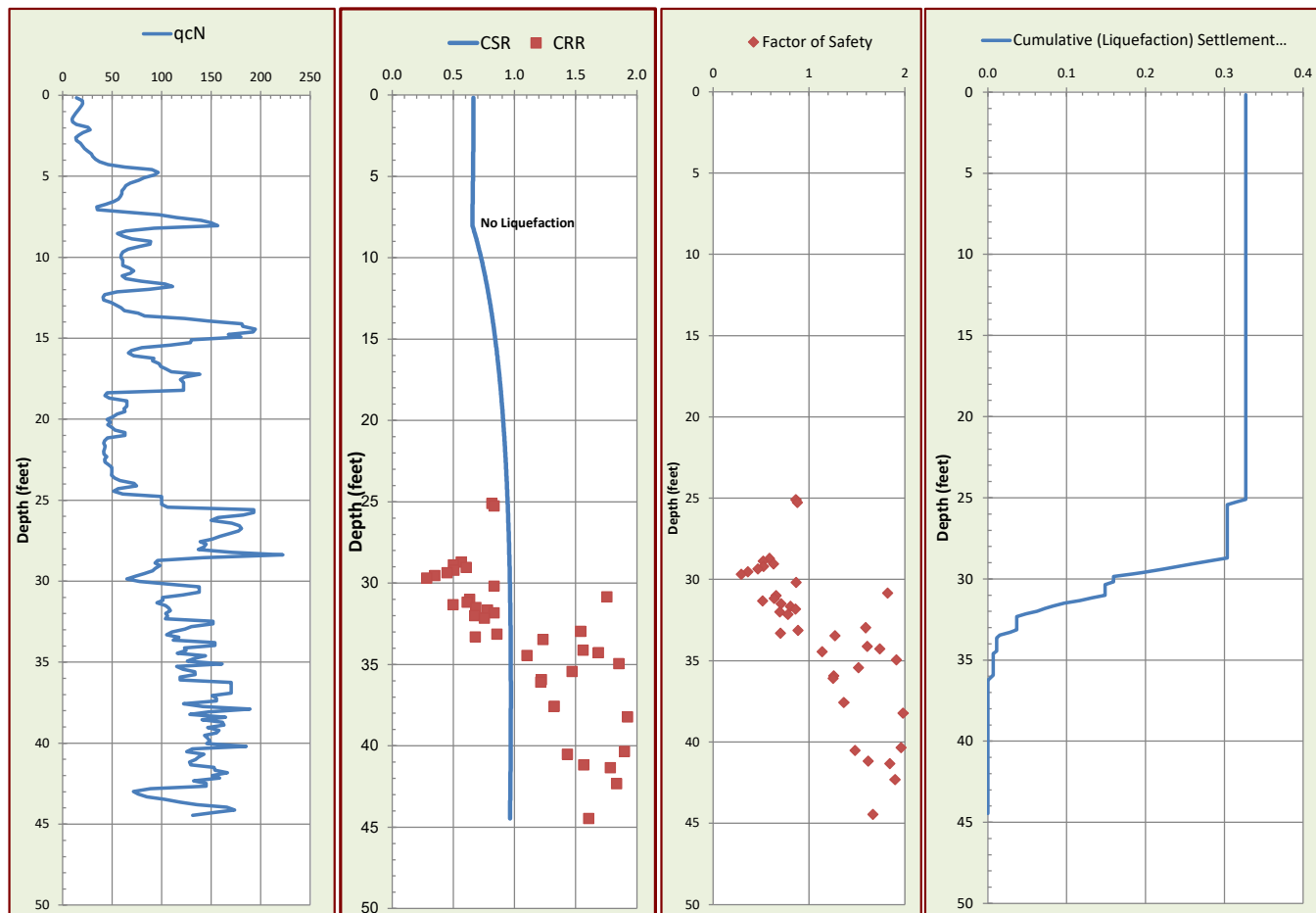
TOTAL SEISMIC SETTLEMENT 0.3 INCHES
POTENTIAL LATERAL DISPLACEMENT

LDI² **0.00** L/H **5.0**

LDI¹ Corrected for Distance **0.00** (4 < L/H < 40)

EXPECTED RANGE OF DISPLACEMENT
0.0 to **0.0** feet

¹Not Valid for L/H Values < 4 and > 40.

²LDI Values Only Summed to 2H Below Grade.


© 2014 Cornerstone Earth Group, Inc.

PROJECT/CPT DATA

Project Title **Halsey House**

Project No. **118-161-1**

Project Manager **SCO**

SEISMIC PARAMETERS

Controlling Fault **San Andreas**

Earthquake Magnitude (Mw) **7.6**

PGA (Amax) **1.02** (g)

SITE SPECIFIC PARAMETERS

Ground Water Depth at Time of Drilling (feet) **20**

Design Water Depth (feet) **8**

Ave. Unit Weight Above GW (pcf) **120**

Ave. Unit Weight Below GW (pcf) **125**

CPT ANALYSIS RESULTS

DRY SAND SETTLEMENT FROM **8** FEET

0.00 (Inches)

LIQUEFACTION SETTLEMENT FROM **50** FEET

0.62 (Inches)

TOTAL SEISMIC SETTLEMENT 0.6 INCHES

POTENTIAL LATERAL DISPLACEMENT

LDI² **0.00** L/H **18.6**

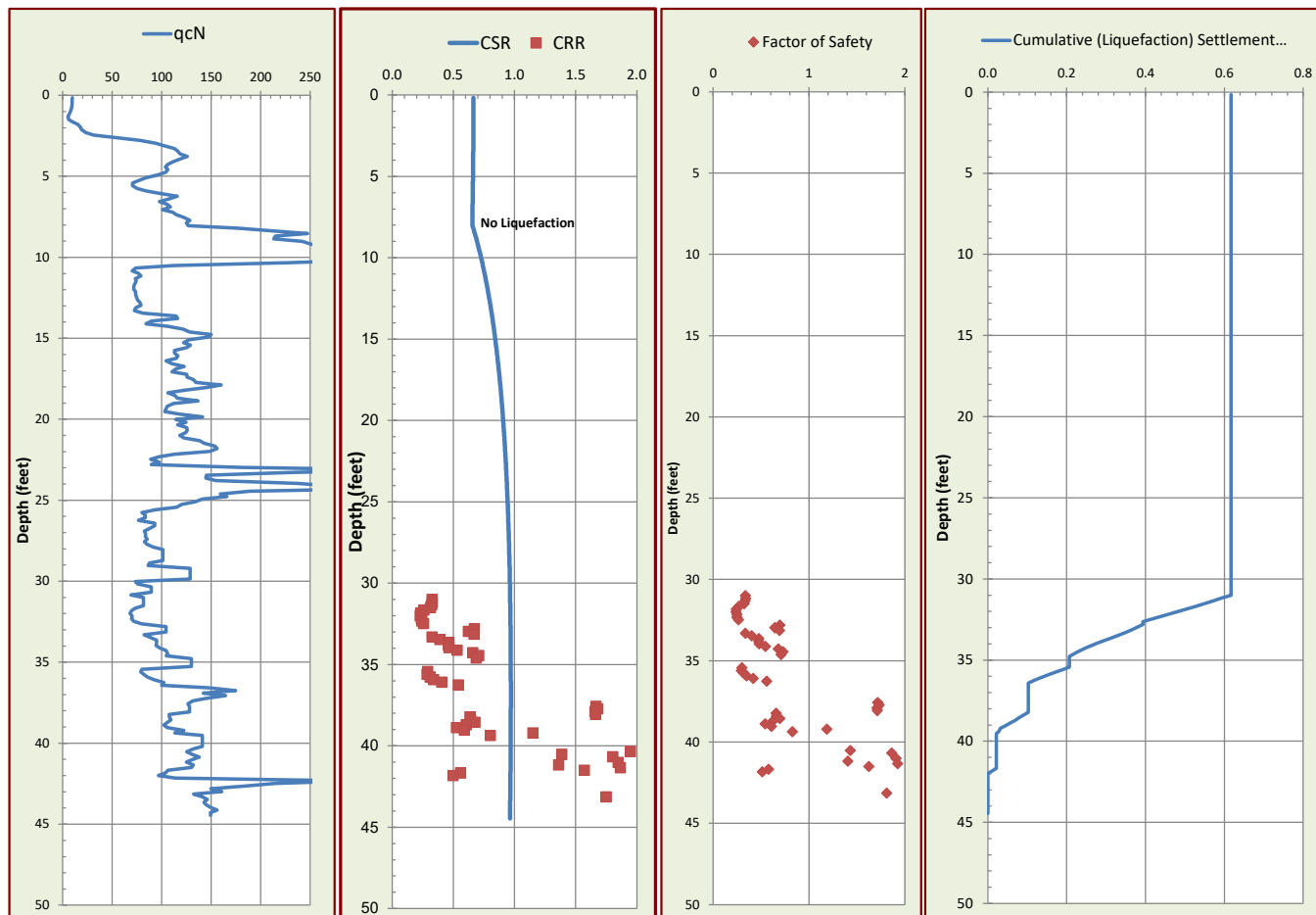
LDI¹ Corrected for Distance **0.00** (4 < L/H < 40)

EXPECTED RANGE OF DISPLACEMENT

0.0 to **0.0** feet

¹Not Valid for L/H Values < 4 and > 40.

²LDI Values Only Summed to 2H Below Grade.



© 2014 Cornerstone Earth Group, Inc.

PROJECT/CPT DATA

Project Title **Halsey House**

Project No. **118-161-1**

Project Manager **SCO**

SEISMIC PARAMETERS

Controlling Fault **San Andreas**

Earthquake Magnitude (Mw) **7.6**

PGA (Amax) **1.02** (g)

SITE SPECIFIC PARAMETERS

Ground Water Depth at Time of Drilling (feet) **20**

Design Water Depth (feet) **8**

Ave. Unit Weight Above GW (pcf) **120**

Ave. Unit Weight Below GW (pcf) **125**

CPT ANALYSIS RESULTS

DRY SAND SETTLEMENT FROM **8** FEET

0.06 (Inches)

LIQUEFACTION SETTLEMENT FROM **50** FEET

0.35 (Inches)

TOTAL SEISMIC SETTLEMENT 0.4 INCHES

POTENTIAL LATERAL DISPLACEMENT

LDI² **0.00** L/H **12.1**

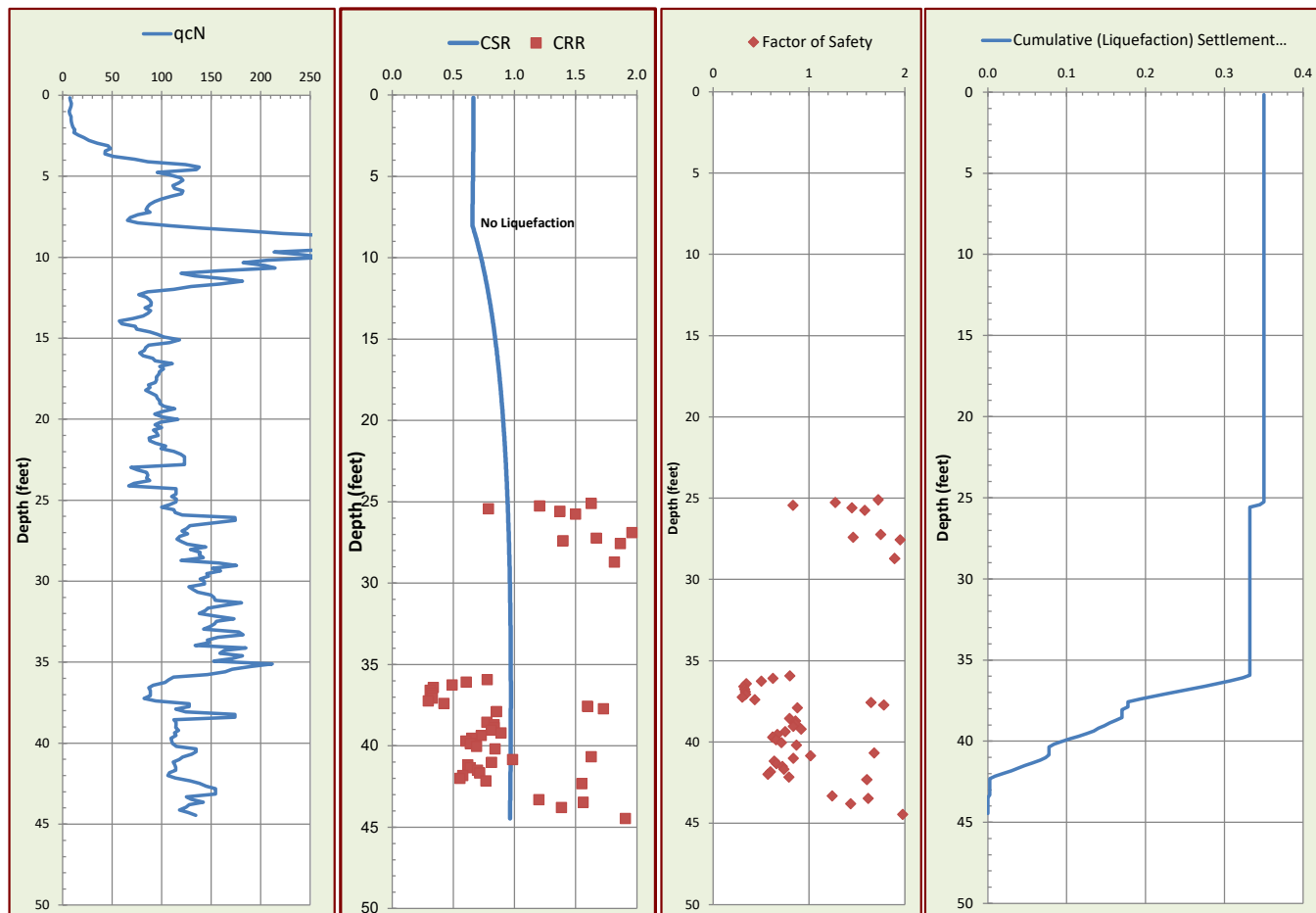
LDI¹ Corrected for Distance **0.00** (4 < L/H < 40)

EXPECTED RANGE OF DISPLACEMENT

0.0 to **0.0** feet

¹Not Valid for L/H Values < 4 and > 40.

²LDI Values Only Summed to 2H Below Grade.



APPENDIX A: FIELD INVESTIGATION

The field investigation consisted of a surface reconnaissance and a subsurface exploration program using track-mounted, limited-access, hollow-stem auger drilling equipment and track-mounted Cone Penetration Test equipment. Two 6½-inch-diameter exploratory borings were drilled on January 23, 2024 to depths of 25 and 30 feet. Three CPT soundings were also performed in accordance with ASTM D 5778-95 (revised, 2002) on January 16, 2024, to depths of approximately 44½ feet each. The approximate locations of exploratory borings and CPTs are shown on the Site Plan, Figure 2. The soils encountered were continuously logged in the field by our representative and described in accordance with the Unified Soil Classification System (ASTM D2488). Boring logs, as well as a key to the classification of the soil and bedrock, are included as part of this appendix.

Boring and CPT locations were approximated using existing site boundaries, a hand-held GPS unit, and other site features as references. Boring and CPT elevations were not determined. The locations of the borings and CPTs should be considered accurate only to the degree implied by the method used.

Representative soil samples were obtained from the borings at selected depths. All samples were returned to our laboratory for evaluation and appropriate testing. The standard penetration resistance blow counts were obtained by dropping a 140-pound hammer through a 30-inch free fall. The 2-inch O.D. split-spoon sampler was driven 18 inches, and the number of blows was recorded for each 6 inches of penetration (ASTM D1586). 2.5-inch I.D. samples were obtained using a Modified California Sampler driven into the soil with the 140-pound hammer previously described. Unless otherwise indicated, the blows per foot recorded on the boring log represent the accumulated number of blows required to drive the last 12 inches. The various samplers are denoted at the appropriate depth on the boring logs.

The CPT involved advancing an instrumented cone-tipped probe into the ground while simultaneously recording the resistance at the cone tip (q_c) and along the friction sleeve (f_s) at approximately 5-centimeter intervals. Based on the tip resistance and tip to sleeve ratio (R_f), the CPT classified the soil behavior type and estimated engineering properties of the soil, such as equivalent Standard Penetration Test (SPT) blow count, internal friction angle within sand layers, and undrained shear strength in silts and clays. A pressure transducer behind the tip of the CPT cone measured pore water pressure (u_2). Graphical logs of the CPT data are included as part of this appendix.

Field tests included an evaluation of the unconfined compressive strength of the soil samples using a pocket penetrometer device. The results of these tests are presented on the individual boring logs at the appropriate sample depths.

Attached boring and CPT logs and related information depict subsurface conditions at the locations indicated and on the date designated on the logs. Subsurface conditions at other locations may differ from conditions occurring at these boring and CPT locations. The passage of time may result in altered subsurface conditions due to environmental changes. In addition,

any stratification lines on the logs represent the approximate boundary between soil types and the transition may be gradual.

UNIFIED SOIL CLASSIFICATION (ASTM D-2487-10)

MATERIAL TYPES	CRITERIA FOR ASSIGNING SOIL GROUP NAMES			GROUP SYMBOL	SOIL GROUP NAMES & LEGEND	
COARSE-GRAINED SOILS >50% RETAINED ON NO. 200 SIEVE	GRAVELS >50% OF COARSE FRACTION RETAINED ON NO 4. SIEVE	CLEAN GRAVELS <5% FINES	Cu>4 AND 1<Cc<3	GW	WELL-GRADED GRAVEL	
			Cu>4 AND 1>Cc>3	GP	POORLY-GRADED GRAVEL	
		GRAVELS WITH FINES >12% FINES	FINES CLASSIFY AS ML OR CL	GM	SILTY GRAVEL	
			FINES CLASSIFY AS CL OR CH	GC	CLAYEY GRAVEL	
	SANDS >50% OF COARSE FRACTION PASSES ON NO 4. SIEVE	CLEAN SANDS <5% FINES	Cu>6 AND 1<Cc<3	SW	WELL-GRADED SAND	
			Cu>6 AND 1>Cc>3	SP	POORLY-GRADED SAND	
		SANDS AND FINES >12% FINES	FINES CLASSIFY AS ML OR CL	SM	SILTY SAND	
			FINES CLASSIFY AS CL OR CH	SC	CLAYEY SAND	
FINE-GRAINED SOILS >50% PASSES NO. 200 SIEVE	SILTS AND CLAYS LIQUID LIMIT<50	INORGANIC	PI>7 AND PLOTS>"A" LINE	CL	LEAN CLAY	
			PI>4 AND PLOTS<"A" LINE	ML	SILT	
		ORGANIC	LL (oven dried)/LL (not dried)<0.75	OL	ORGANIC CLAY OR SILT	
	SILTS AND CLAYS LIQUID LIMIT>50	INORGANIC	PI PLOTS >"A" LINE	CH	FAT CLAY	
			PI PLOTS <"A" LINE	MH	ELASTIC SILT	
		ORGANIC	LL (oven dried)/LL (not dried)<0.75	OH	ORGANIC CLAY OR SILT	
HIGHLY ORGANIC SOILS		PRIMARILY ORGANIC MATTER, DARK IN COLOR, AND ORGANIC ODOR		PT	PEAT	

OTHER MATERIAL SYMBOLS			
	Poorly-Graded Sand with Clay		Sand
	Clayey Sand		Silt
	Sandy Silt		Well Graded Gravelly Sand
	Artificial/Undocumented Fill		Gravelly Silt
	Poorly-Graded Gravelly Sand		Asphalt
	Topsoil		Boulders and Cobble
	Well-Graded Gravel with Clay		
	Well-Graded Gravel with Silt		

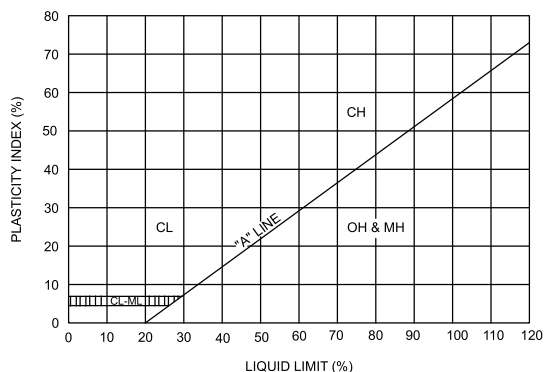
SAMPLER TYPES

	SPT		Shelby Tube
	Modified California (2.5" I.D.)		No Recovery
	Rock Core		Grab Sample

ADDITIONAL TESTS

CA - CHEMICAL ANALYSIS (CORROSIVITY)	PI - PLASTICITY INDEX
CD - CONSOLIDATED DRAINED TRIAXIAL	SW - SWELL TEST
CN - CONSOLIDATION	TC - CYCLIC TRIAXIAL
CU - CONSOLIDATED UNDRAINED TRIAXIAL	TV - TORVANE SHEAR
DS - DIRECT SHEAR	UC - UNCONFINED COMPRESSION
PP - POCKET PENETROMETER (TSF)	(1.5) - (WITH SHEAR STRENGTH IN KSF)
(3.0) - (WITH SHEAR STRENGTH IN KSF)	
RV - R-VALUE	UU - UNCONSOLIDATED UNDRAINED TRIAXIAL
SA - SIEVE ANALYSIS: % PASSING #200 SIEVE	
- WATER LEVEL	

PLASTICITY CHART



PENETRATION RESISTANCE (RECORDED AS BLOWS / FOOT)

SAND & GRAVEL		SILT & CLAY		
RELATIVE DENSITY	BLOWS/FOOT*	CONSISTENCY	BLOWS/FOOT*	STRENGTH** (KSF)
VERY LOOSE	0 - 4	VERY SOFT	0 - 2	0 - 0.25
LOOSE	4 - 10	SOFT	2 - 4	0.25 - 0.5
MEDIUM DENSE	10 - 30	MEDIUM STIFF	4 - 8	0.5 - 1.0
DENSE	30 - 50	STIFF	8 - 15	1.0 - 2.0
VERY DENSE	OVER 50	VERY STIFF	15 - 30	2.0 - 4.0
		HARD	OVER 30	OVER 4.0

* NUMBER OF BLOWS OF 140 LB HAMMER FALLING 30 INCHES TO DRIVE A 2 INCH O.D. (1-3/8 INCH I.D.) SPLIT-BARREL SAMPLER THE LAST 12 INCHES OF AN 18-INCH DRIVE (ASTM-1586 STANDARD PENETRATION TEST).

** UNDRAINED SHEAR STRENGTH IN KIPS/SQ. FT. AS DETERMINED BY LABORATORY TESTING OR APPROXIMATED BY THE STANDARD PENETRATION TEST, POCKET PENETROMETER, TORVANE, OR VISUAL OBSERVATION.



**CORNERSTONE
EARTH GROUP**

**LEGEND TO SOIL
DESCRIPTIONS**

Figure Number
A-1



CORNERSTONE EARTH GROUP

BORING NUMBER EB-1

PAGE 1 OF 1

PROJECT NAME Halsey HousePROJECT NUMBER 118-161-1PROJECT LOCATION Los Altos, CADATE STARTED 1/23/24 DATE COMPLETED 1/23/24DRILLING CONTRACTOR Cuesta GeoDRILLING METHOD MPP LAD Track Rig, 6½ inch Hollow-Stem AugerLOGGED BY JDS

NOTES _____

GROUND ELEVATION _____ BORING DEPTH 25 ft.LATITUDE 37.3730383° LONGITUDE -122.1196333°

GROUND WATER LEVELS:

▼ AT TIME OF DRILLING 15 ft.▼ AT END OF DRILLING 10 ft.

This log is a part of a report by Cornerstone Earth Group, and should not be used as a stand-alone document. This description applies only to the location of the exploration at the time of drilling. Subsurface conditions may differ at other locations and may change at this location with time. The description presented is a simplification of actual conditions encountered. Transitions between soil types may be gradual.

ELEVATION (ft)	DEPTH (ft)	SYMBOL	DESCRIPTION	N-Value (uncorrected) blows per foot	SAMPLES TYPE AND NUMBER	DRY UNIT WEIGHT PCF	NATURAL MOISTURE CONTENT	PLASTICITY INDEX %	PERCENT PASSING No. 200 SIEVE	UNDRAINED SHEAR STRENGTH, ksf				
	0		Sandy Lean Clay (CL) [Fill] stiff, moist, brown, fine to coarse sand, low plasticity							○ HAND PENETROMETER				
			Sandy Lean Clay (CL) stiff, moist, dark brown to brown, fine to coarse sand, low plasticity	5	MC-1B	95	14			△ TORVANE				
				5	MC-2B	108	14			● UNCONFINED COMPRESSION				
	5		Sandy Lean Clay (CL) hard, moist, brown, fine to coarse sand, low plasticity	20	MC-3B	101	11			▲ UNCONSOLIDATED-UNDRAINED TRIAXIAL				
				48	MC-4B	93	30		67					>4.5
	10		becomes stiff	23	SPT-5		25							
	15		Clayey Sand with Gravel (SC) dense, moist, reddish brown, fine to coarse sand, fine to coarse subangular to subrounded gravel	38	SPT									
			becomes medium dense, decreasing gravel content	34	MC-7B	106	22							
			Lean Clay with Sand (CL) very stiff, moist, reddish brown, fine to coarse sand, low plasticity	32	MC-8B	89	33							
			Clayey Sand (SC) dense, moist, reddish brown, fine to coarse sand, some fine subangular gravel	31	SPT-9		29							
	25		Bottom of Boring at 25.0 feet.											

CORNERSTONE EARTH GROUP2 - CORNERSTONE 0812.GDT - 1/31/24 10:39 - P:\DRAFTING\GINT FILES\118-161-1 HALSEY HOUSE.GPJ



CORNERSTONE EARTH GROUP

BORING NUMBER EB-2

PAGE 1 OF 2

PROJECT NAME Halsey HousePROJECT NUMBER 118-161-1PROJECT LOCATION Los Altos, CADATE STARTED 1/23/24 DATE COMPLETED 1/23/24DRILLING CONTRACTOR Cuesta GeoDRILLING METHOD MPP LAD Track Rig, 6½ inch Hollow-Stem AugerLOGGED BY JDS

NOTES _____

GROUND ELEVATION _____ BORING DEPTH 30 ft.LATITUDE 37.3727601° LONGITUDE -122.1195807°

GROUND WATER LEVELS:

▼ AT TIME OF DRILLING 12 ft.▼ AT END OF DRILLING 12 ft.

This log is a part of a report by Cornerstone Earth Group, and should not be used as a stand-alone document. This description applies only to the location of the exploration at the time of drilling. Subsurface conditions may differ at other locations and may change at this location with time. The description presented is a simplification of actual conditions encountered. Transitions between soil types may be gradual.

ELEVATION (ft)

DEPTH (ft)

SYMBOL

DESCRIPTION

Sandy Lean Clay (CL) [Fill]
stiff, moist, brown, fine to coarse sand, low plasticity

Sandy Lean Clay (CL)
stiff, moist, dark brown to brown, fine to coarse sand, low plasticity

Clayey Sand (SC)
medium dense, moist, reddish brown, fine to coarse sand, some fine subangular gravel

Clayey Sand with Gravel (SC)
dense, moist, brown, fine to coarse sand, fine to coarse subangular to subrounded gravel, some cobbles

Clayey Sand (SC)
medium dense, moist, reddish brown, fine to coarse sand, some fine subangular gravel

becomes dense

Continued Next Page

N-Value (uncorrected)
blows per footSAMPLES
TYPE AND NUMBERDRY UNIT WEIGHT
PCFNATURAL
MOISTURE CONTENT

PLASTICITY INDEX, %

PERCENT PASSING
No. 200 SIEVEUNDRAINED SHEAR STRENGTH,
ksf

○ HAND PENETROMETER

△ TORVANE

● UNCONFINED COMPRESSION

▲ UNCONSOLIDATED-UNDRAINED
TRIAxIAL

1.0 2.0 3.0 4.0



PROJECT NAME Halsey House

PROJECT NUMBER 118-161-1

PROJECT LOCATION Los Altos, CA

This log is a part of a report by Cornerstone Earth Group, and should not be used as a stand-alone document. This description applies only to the location of the exploration at the time of drilling. Subsurface conditions may differ at other locations and may change at this location with time. The description presented is a simplification of actual conditions encountered. Transitions between soil types may be gradual.

ELEVATION (ft)

DEPTH (ft)

SYMBOL

DESCRIPTION

Clayey Sand (SC)
dense, moist, reddish brown, fine to coarse sand, some fine subangular gravel

some thin lenses of Sandy Lean Clay (CL)

Bottom of Boring at 30.0 feet.

N-Value (uncorrected)
blows per foot

SAMPLES
TYPE AND NUMBER

DRY UNIT WEIGHT
PCF

NATURAL
MOISTURE CONTENT

PLASTICITY INDEX, %

PERCENT PASSING
No. 200 SIEVE

UNDRAINED SHEAR STRENGTH,
ksf

○ HAND PENETROMETER

△ TORVANE

● UNCONFINED COMPRESSION

▲ UNCONSOLIDATED-UNDRAINED
TRIAXIAL

1.0 2.0 3.0 4.0

37

SPT-8

23

35

SPT-9

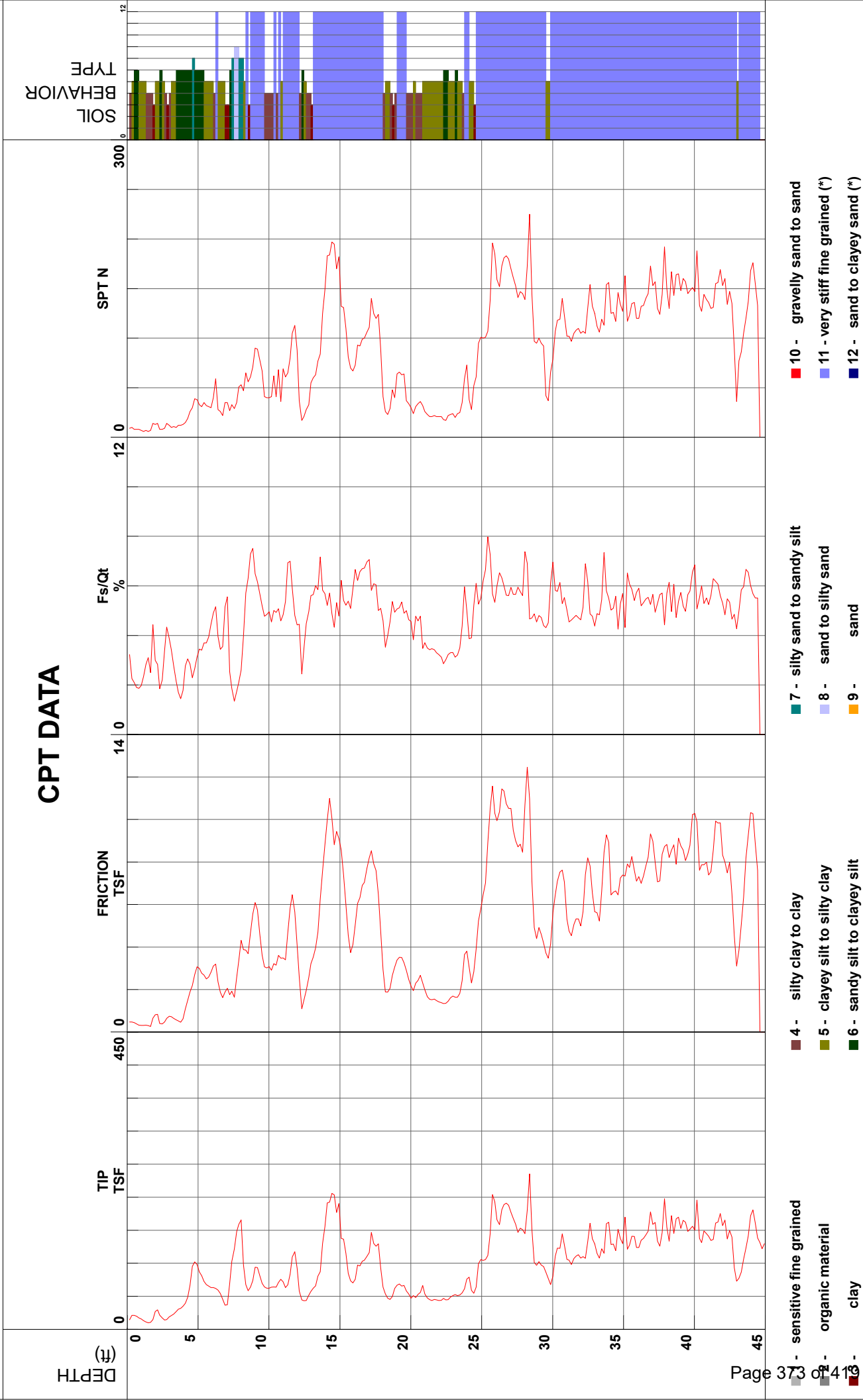
29

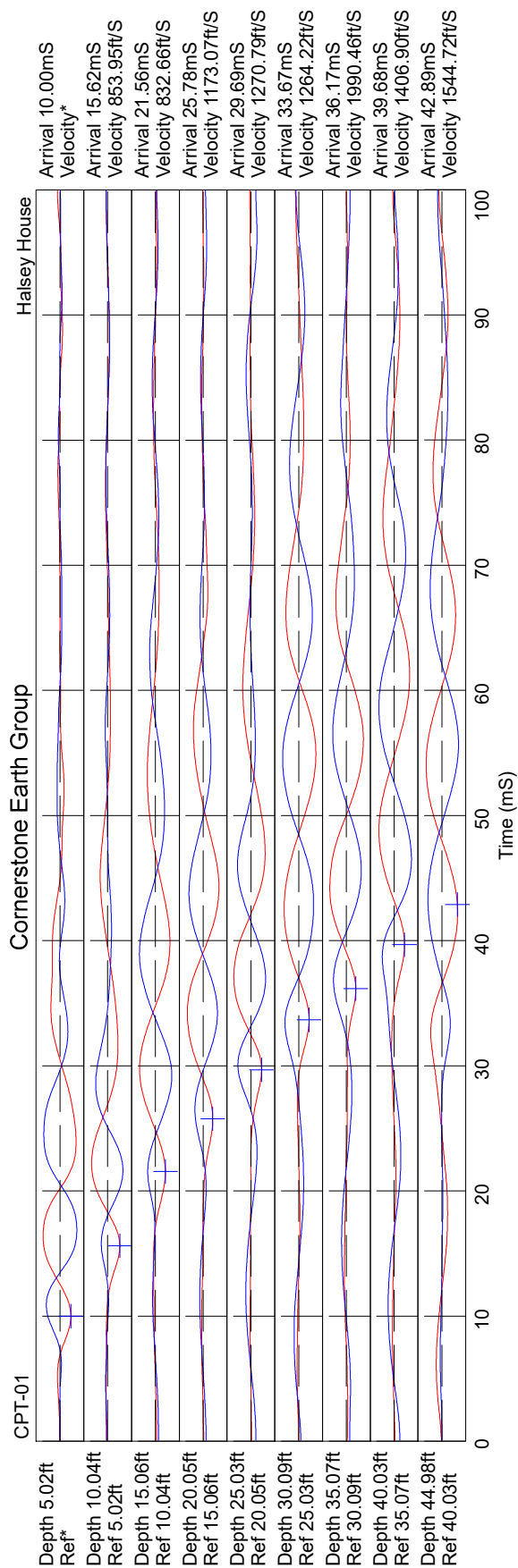


Cornerstone Earth Group

Project	Halsey House	Operator	JM-FA	Filename	SDF(279).cpt
Job Number	118-161-1	Cone Number	DDG1596	GPS	
Hole Number	CPT-01	Date and Time	1/16/2024 11:09:52 AM	Maximum Depth	44.95 ft
EST GW Depth During Test	NO GW				

Net Area Ratio .8





Hammer to Rod String Distance (ft): 2.17
* = Not Determined

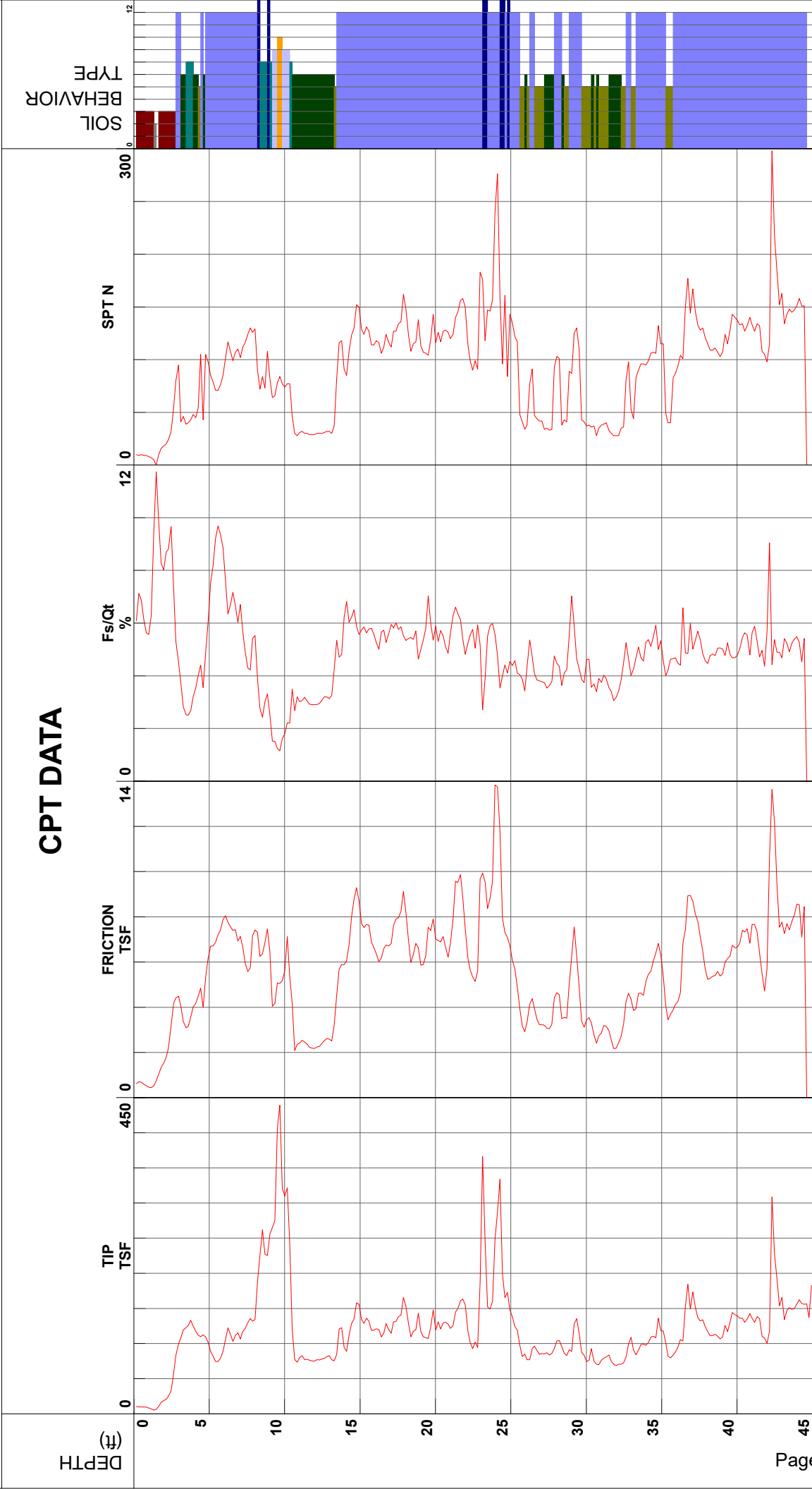
COMMENT:

Cornerstone Earth Group



Project	Halsey House	Operator	JM-FA	Filename	SDF(280).cpt
Job Number	118-161-1	Cone Number	DDG1596	GPS	
Hole Number	CPT-02	Date and Time	1/16/2024 12:01:25 PM	Maximum Depth	44.95 ft
EST GW Depth During Test	NO GW				

Net Area Ratio .8

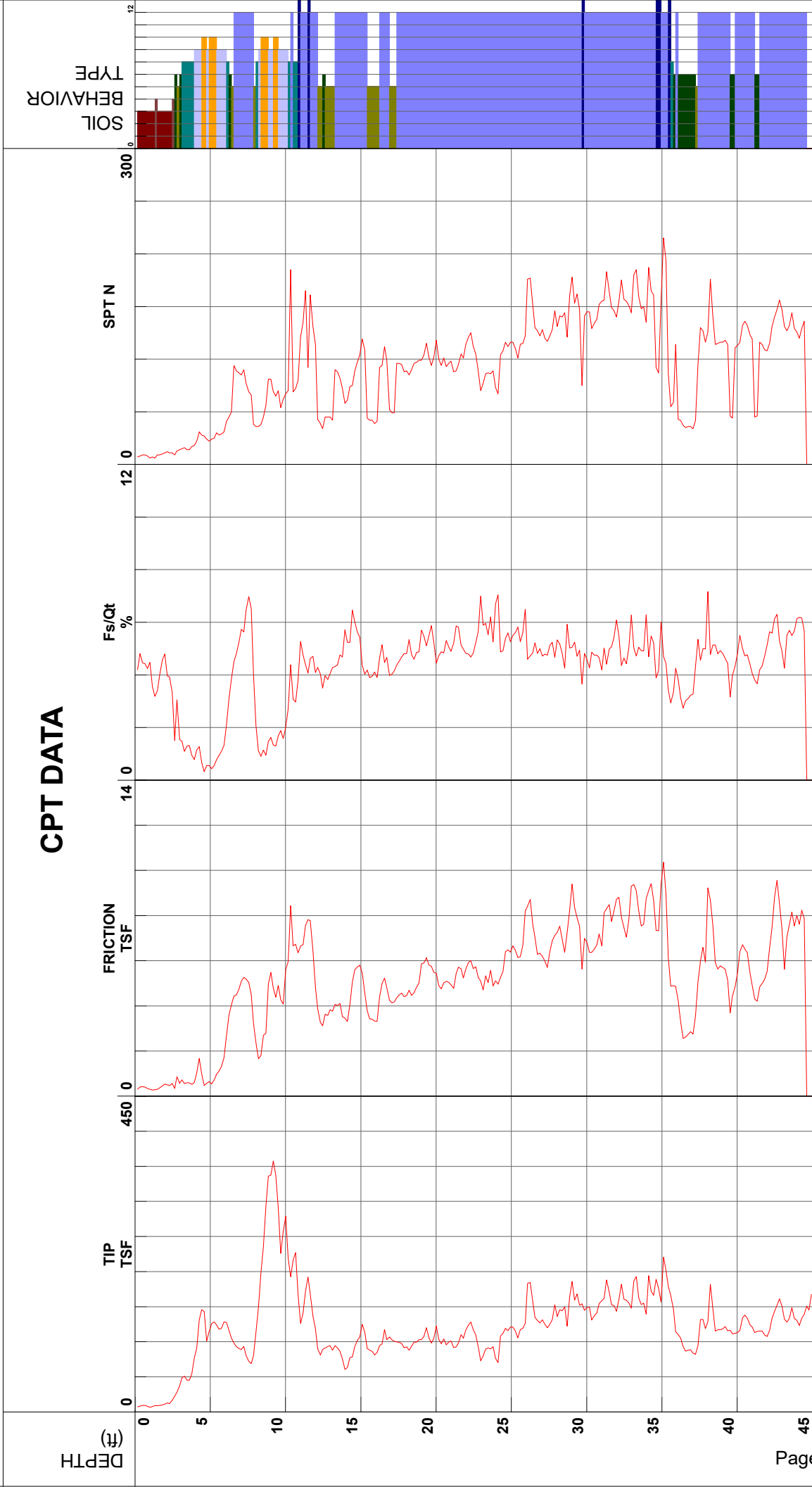




Cornerstone Earth Group

Project	Halsey House	Operator	JM-FA	Filename	SDF(278).cpt
Job Number	118-161-1	Cone Number	DDG1596	GPS	
Hole Number	CPT-03	Date and Time	1/16/2024 10:04:52 AM	Maximum Depth	44.95 ft
EST GW Depth During Test	NO GW				

Net Area Ratio .8



APPENDIX B: LABORATORY TEST PROGRAM

The laboratory testing program was performed to evaluate the physical and mechanical properties of the soils retrieved from the site to aid in verifying soil classification.

Moisture Content: The natural water content was determined (ASTM D2216) on 16 samples of the materials recovered from the borings. These water contents are recorded on the boring logs at the appropriate sample depths.

Dry Densities: In place dry density determinations (ASTM D2937) were performed on 10 samples to measure the unit weight of the subsurface soils. Results of these tests are shown on the boring logs at the appropriate sample depths.

Washed Sieve Analyses: The percent soil fraction passing the No. 200 sieve (ASTM D1140) was determined on two samples of the subsurface soils to aid in the classification of these soils. Results of these tests are shown on the boring logs at the appropriate sample depths.

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.

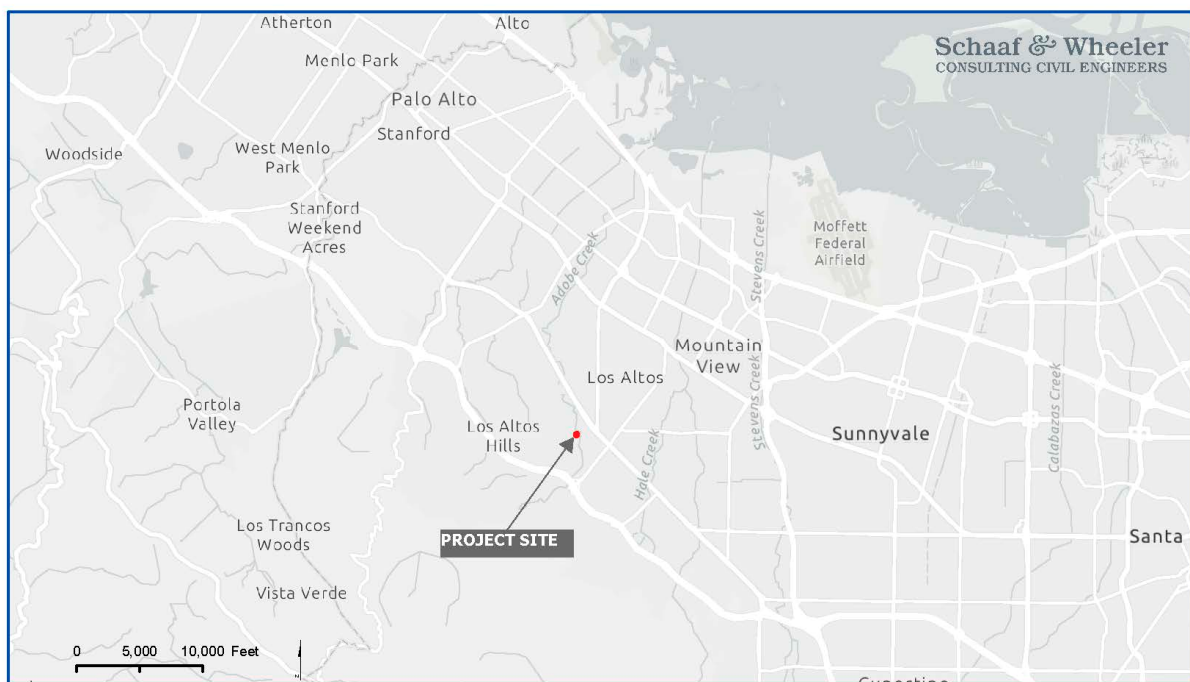


Figure 1. Regional Map of Project Site

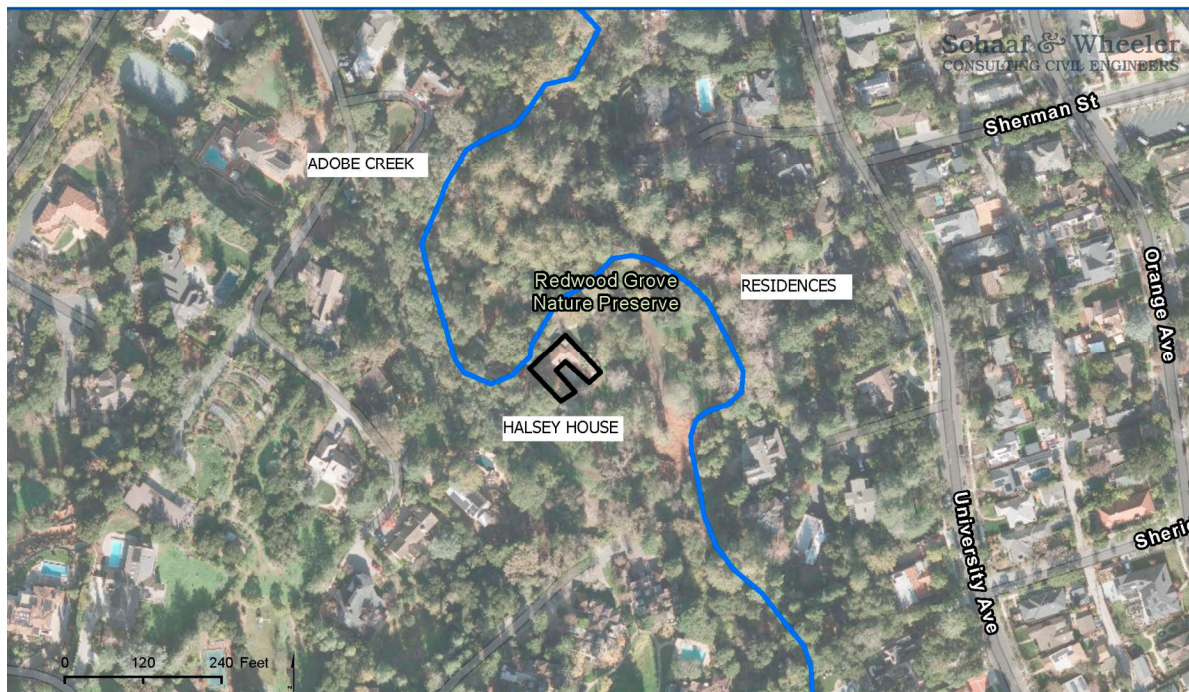


Figure 2. Vicinity Map of Project Site

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.

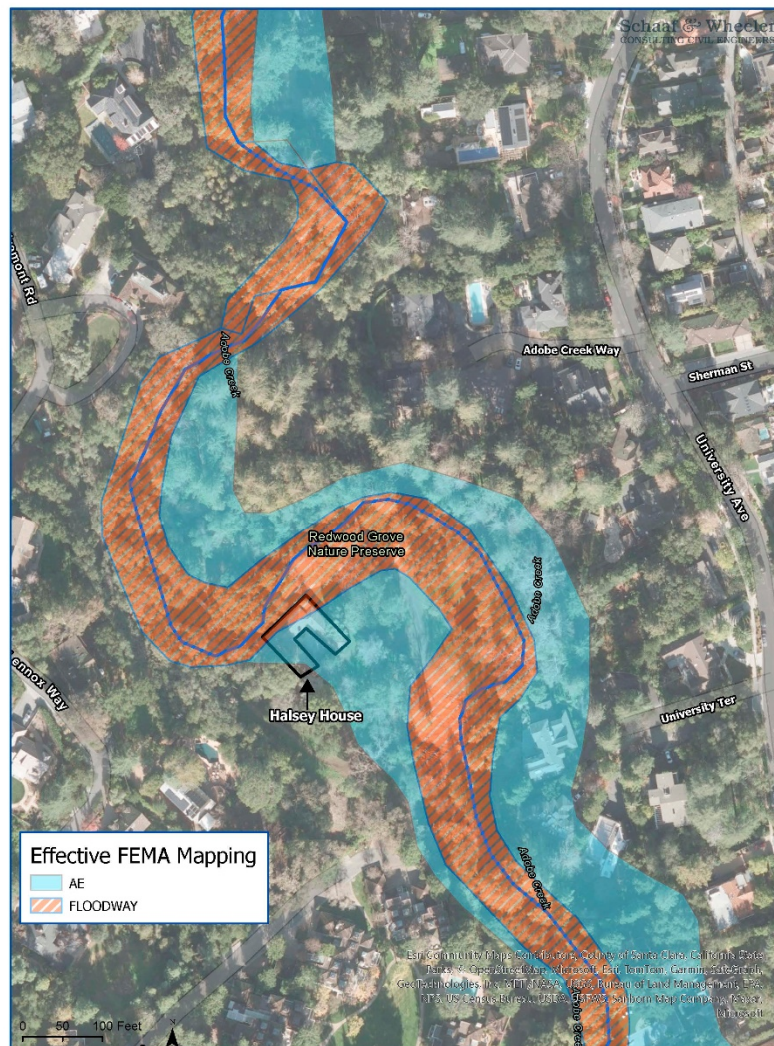


Figure 3. Flood Hazard Zones on Project Site

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.

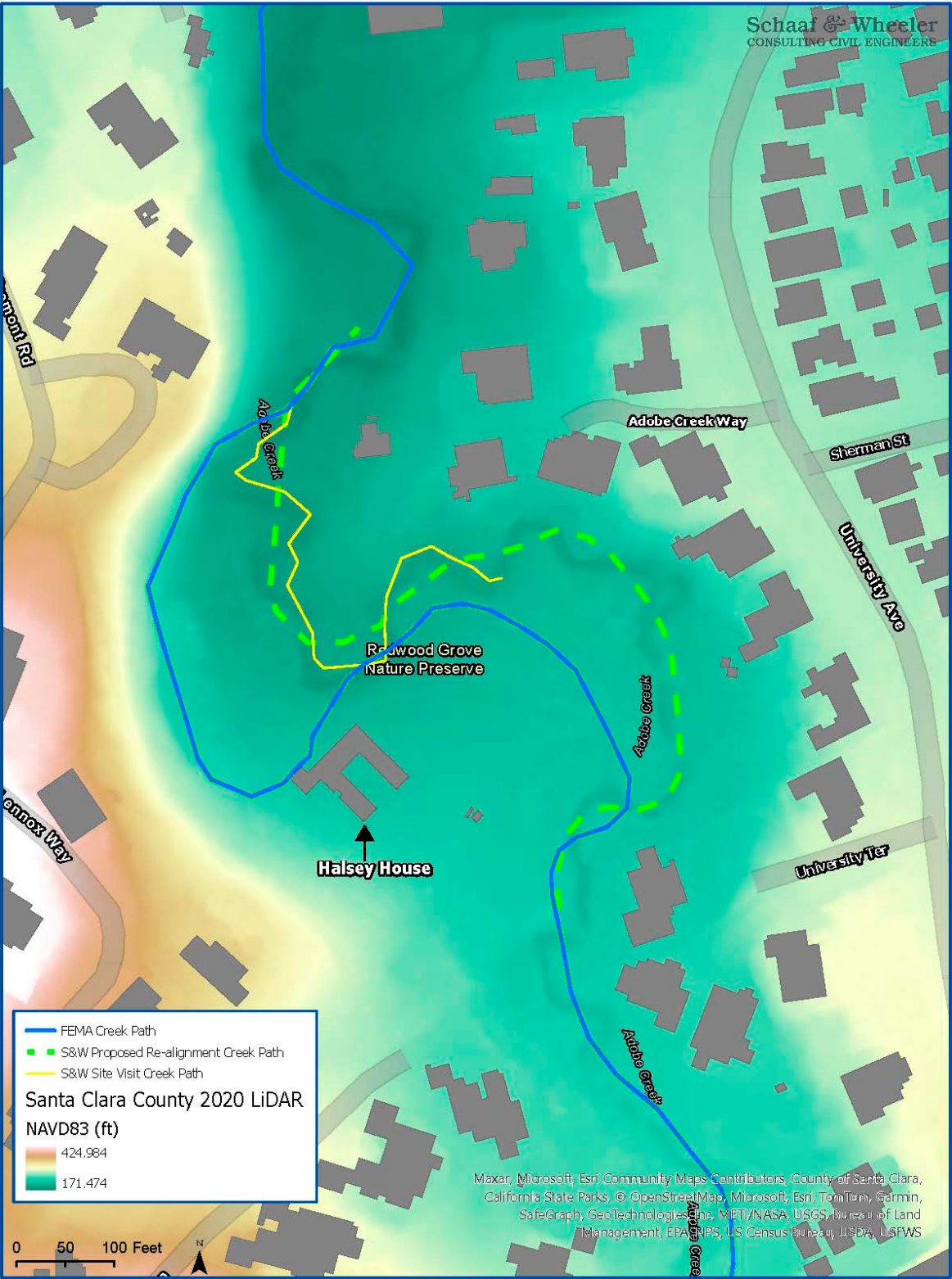


Figure 4. Site Investigation and LiDAR Creek Path

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.

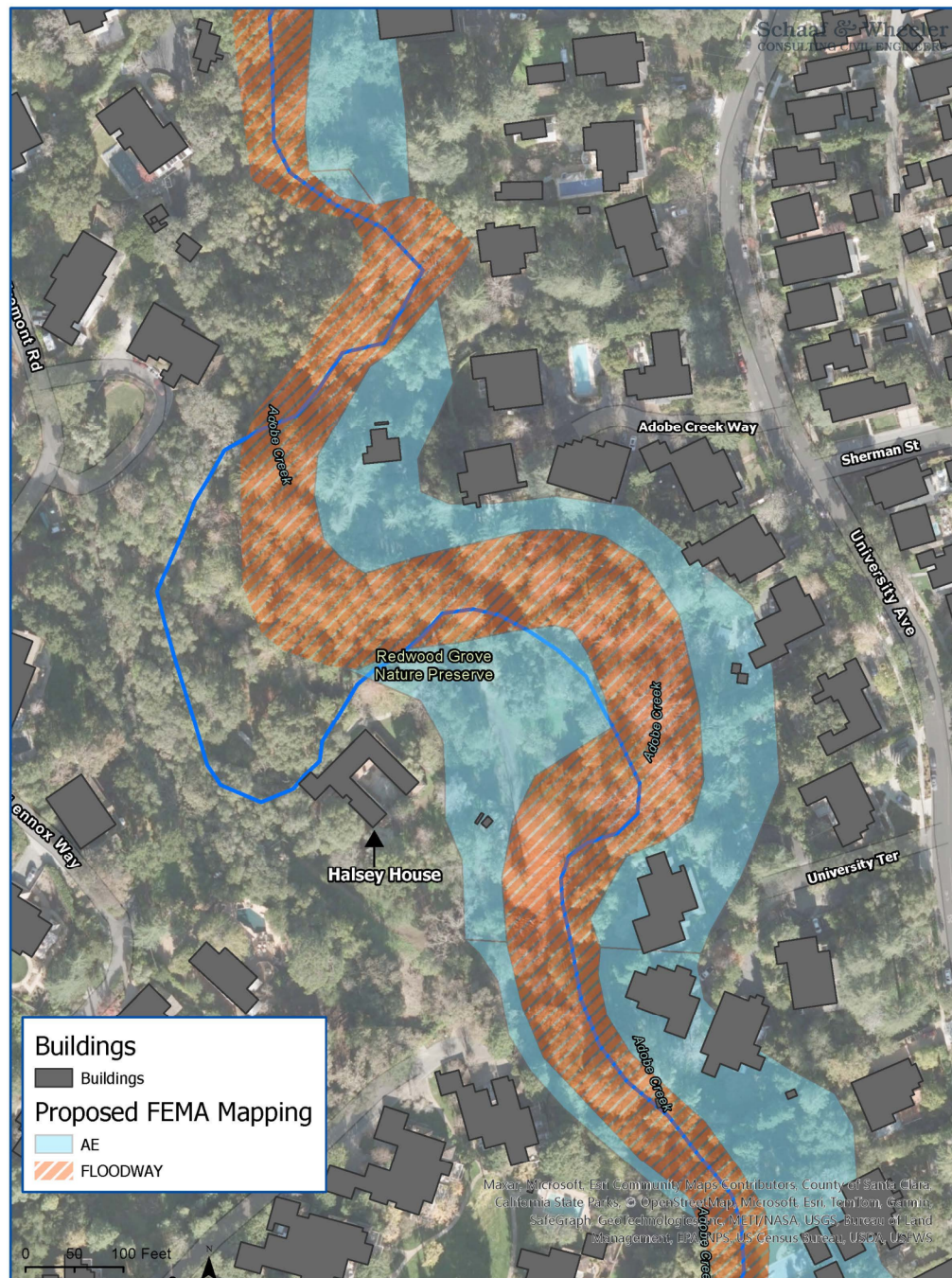


Figure 5. Proposed FEMA Re-Mapping

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.

HALSEY HOUSE RELOCATION FEASIBILITY STUDY

LOS ALTOS, CALIFORNIA
[23219]

PREPARED FOR
David J. Powers & Associates, Inc.

July 15, 2024

FINAL – REVISED



TABLE OF CONTENTS

INTRODUCTION	3
Background and Purpose.....	3
Methodology	3
BUILDING DESCRIPTION.....	3
RELOCATION	5
General Considerations	5
Structural Considerations	5
Logistical Considerations.....	7
Receiver Site Considerations	10
EVALUATION OF POTENTIAL IMPACTS	12
Historic Resource Integrity Considerations	13
Site Impact Considerations	15
CONCLUSION	17
ATTACHMENT A: STRUCTURAL REPORT	18

INTRODUCTION

BACKGROUND AND PURPOSE

Page & Turnbull has been retained by David J. Powers & Associates to provide Preservation Alternative consultation, including a Feasibility Study Memorandum considering the relocation of the Halsey House related to the Environmental Impact Report (EIR) analyzing the potential demolition of the Halsey House in the Redwood Grove Nature Preserve in Los Altos, California.

This Feasibility Study has been prepared to assess the feasibility of the proposed relocation and evaluate the potential impacts to the historic resource's integrity as an alternative to its demolition. This property located at 482 University Avenue, was found eligible under Criterion 1 (Events) for the California Register of Historical Resources (California Register) at the state level by the research and analysis reported in the *Halsey House Historic Resource Evaluation* (HRE) dated August 30, 2021, prepared by Page & Turnbull.

The focus of the following analysis is (1) on the physical feasibility of relocating the building either on-site or off-site to an acceptable receiver site and (2) on the evaluation of potential adverse impacts to the historic resource and surrounding site. It is not a comprehensive study of the overall feasibility of the option with regard to cost and further repair or rehabilitation scope.

METHODOLOGY

Page & Turnbull staff performed on-site observations of the overall condition of the building, with particular attention to its construction and foundations, to evaluate the structural feasibility of relocating the building. T&S Structural was also consulted regarding the logistical and structural considerations for potentially relocating the building on-site or off-site.

BUILDING DESCRIPTION

The following building description is summarized from the *Historic Resource Evaluation* dated August 30, 2021, prepared by Page & Turnbull, unless otherwise noted.

The building, currently located in the approximately six-acre Redwood Grove owned by the City of Los Altos (Owner), is a one-story single-family residence constructed in 1923 with a 1928-addition at the west corner of the north façade. The generally U-shaped wood frame building has a clay tile hipped roof, stucco clad exterior walls, and features a brick chimney at the west façade of the addition and a stucco clad chimney centered at the south-facing wall of the courtyard. Fenestration on the building consists of original multi-lite wood windows including asymmetrically divided three-over-one double-hung sash, six-lite casement windows, small four-lite casement windows, some one-over-one double-hung windows, and two pairs of six-lite slider window, and non-original windows including a jalousie window and some fixed single-lite windows. The building also retains several original wood-frame doors that include paired ten-lite French doors. The enclosed courtyard features a stucco clad south wall with an arched entrance preceded by semi-circular stone steps and

a small fountain attached to the wall and flanked by two curved buttresses with built in benches. The primary entrance to the residence features a porch reached via low concrete steps and a concrete landing with a wood pergola and plastic roof. Some of the extant original interior features consist of wood floors, painted plaster walls and ceilings, wood window and door trim, wood baseboard trim and picture railing, a brick fireplace at the addition and a tile fireplace at the original north living room. Non-historic finishes such as acoustic panels, drop ceilings and partitions walls were added when the property was acquired by the city in 1974.



Figure 1 - View of courtyard, looking northwest.

RELOCATION

GENERAL CONSIDERATIONS

Some potential challenges to consider for either on-site or off-site relocation of the building may include the need for soil stabilization or sequencing coordination. In the case of relocation, the current site and building would likely need to undergo a preparation process which could include bracing the building, detaching, or deconstructing portions of the building, and clearing site features, including landscaping, adjacent to the building to make way for building move equipment. Preparations would also need to be made to the selected receiver site, including clearing an adequate area for equipment access, and constructing new foundations and utility connection points for the building. Due to its overall footprint and general layout, the subject building would need to be selectively deconstructed and relocated in sections for feasible transportation.

STRUCTURAL CONSIDERATIONS

A structural evaluation of the subject building for potential on or off-site relocation was performed by T&S Structural to assess the overall structural condition of the building and inform an appropriate bracing design to ensure the safety of the building during the relocation process. The report considers three primary variables impacting the feasibility of moving the structure: the identification of a suitable receiver site; the availability of a suitable transportation route; and the structural integrity of the structure. Refer to Attachment A for the full structural report.

This feasibility study assumes for the purposes of analysis that an on- or off-site receiver location would be identified, procured, and prepared in any relocation scenario, while recognizing the potential challenges of securing such a site in the City of Los Altos. Assuming a suitable receiver site is secured, however, the most significant challenge to relocating the Halsey House would be the second variable: the availability of a suitable transportation route. T&S Structural evaluated three potential routes for relocating the Halsey House off-site and analyzed the impacts of their respective constraints. Any of the potential routes would significantly impact both the house and the surrounding environment. Of particular concern for the house is that the narrowness of the available routes considered in relation to the geometry of the house results in the necessity of dividing the house into approximately 14 separate sections to be relocated and reassembled.

As to the building's structural integrity, preliminary visual examination of the building indicates that it appears to be in sound structural condition, thus it is an acceptable candidate for relocation from a structural perspective. The residential building's wood frame sits on a concrete pier and post system foundation with an accessible crawl space. To relocate the building, the walls and roof would need to be laterally braced and detached from the existing foundation. Considering the size of the building, relocation would require cutting the walls and wood frame at key points while avoiding cutting the building at window or door openings. As noted above, the site constraints dictate that the number of sections would be approximately 14. This approach also requires that all existing floor-mounted interior walls, cabinets, flooring, or fixtures are removed from the building prior to

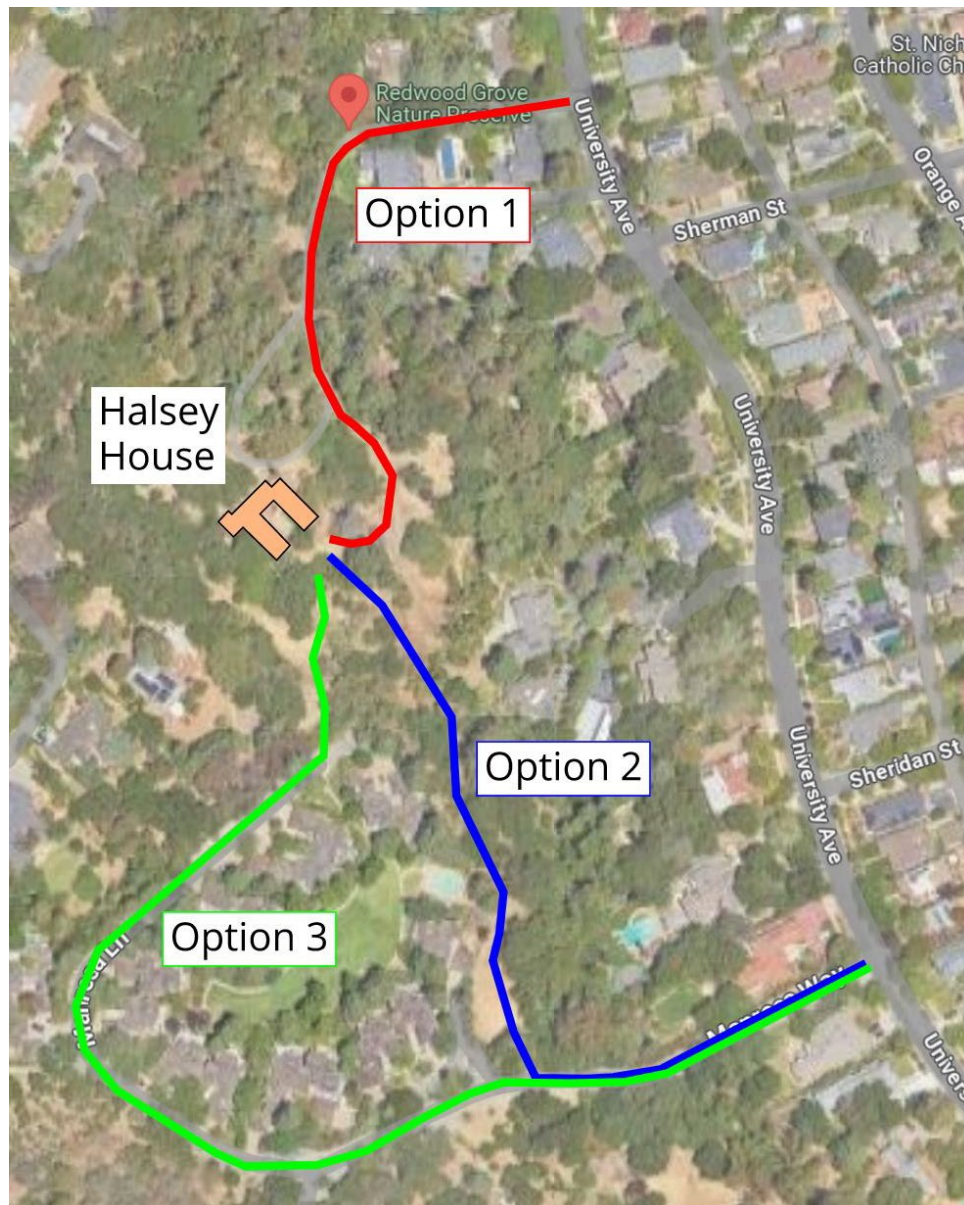
relocation. Elements of historic significance can be reinstalled at the receiver site and non-contributing elements discarded. The ancillary components of the building, including the front porch pergola, south courtyard wall and gate, and chimneys, all pose additional considerations for the relocation process. These components would likely need to be detached and either independently shored and transported, or deconstructed at the original site, and reconstructed at the receiver site.



Figure 2 - View of the brick chimney at west addition, view looking northeast.

LOGISTICAL CONSIDERATIONS

For the purposes of this study, a preliminary review of logistical feasibility for relocation was conducted using Google Maps views of the site and surrounding area, as well as on-site measurement. The Halsey House is approximately 16'-7" in height with an approximate building footprint of 88 feet by 86 feet. The three possible routes for relocation off-site include the Main Entrance to the Preserve; the trail out of the Preserve onto Manresa Way, which is a private road; or through an existing fence onto Manresa Way via Manresa Lane, which is also private. The second and third options both lead to University Ave. from Manresa Way (figure 4).



Key Map: Route Options (background courtesy Google Maps, 2024)

The first option is paved and relatively clear but is limited in width by the existing bridge and mature redwoods on either side of the route. The side rails of the bridge could be temporarily removed to

achieve an approximate maximum section width of 14'-6". (figures 3 and 6) However, the load capacity of the bridge is reported to be 8 tons, which is an additional limiting factor. If the residence were cut into the 14 or more sections necessary to accommodate the route width, each section would weigh approximately eight (8) tons itself, to which would be added approximately seven (7) tons of shoring beams and power dollies for the move, for a total load of approximately 15 tons. To accommodate this load, a temporary bridge over the existing bridge would be required. Temporary bridge construction for the purpose of building relocation is not an unusual scope of work for building movers, and thus has been factored into the feasibility analysis. The temporary bridge would also need to accommodate the load of service trucks and heavy equipment needed for the project, which range from approximately four (4) to nine (9) tons for typical compact units available, though smaller equipment is also manufactured.

The second option would require trimming and selective removal of the existing native plantings and mature trees along the trail and at key intersections, but overall could accommodate wider sections of up to 19'-0" if the existing median features at the intersection of Manresa Way and University Ave were removed. Finally, the third option is limited by the width of the existing private community gates, which are substantial masonry structures, and would require transported sections to be no more than 16'-0" wide. Both the second and third option would also require coordination with and approval from the gated community in addition to the typical local jurisdictional coordination, particularly for removal and trimming of site features along the route. Therefore, these options are considered infeasible by the Owner.

Beyond the Redwood Grove and the adjacent neighborhoods, the typical street within a half-mile radius of the site is approximately 25 feet to 40 feet in width. Refer to Attachment A for the structural report for photos of the three options and mapping of the different routes.



Figure 3 - View of the Redwood Grove Nature Preserve entry from University Ave., view looking west.



Figure 4 - View of Manresa Way entry from University Ave., view looking southwest. Source: Google Earth

Utility lines run through the south side of the parcel with a relatively low head clearance and further assessment of utility lines on the site should be done prior to a relocation effort. Additional

obstacles to relocation would be specific to the route taken, distance to and configuration of the receiver site, and may include unforeseen challenges not covered in this study. Relocation of the building within the site would likely require less coordination with external jurisdictional agencies than an offsite relocation.

In advance of relocation, a receiver site would also need to be secured and a transportation route determined. The proposed receiver site must be evaluated for transportation feasibility logistics in addition to the suitability of its setting. The act of relocating the building offsite would require extensive coordination with several key city, transportation, and utility agencies. This process may include mapping locations and heights of utility lines, traffic signals, vegetation, or other objects that exist along the proposed relocation route. As a general rule, the greater the distance between the current site and receiver site, the more complex and potentially expensive the relocation process would become.

The receiver site would need to be prepared in advance of the building relocation. This may include at a minimum clearing debris and other materials from the site to create a path for the buildings to enter the site. A full build-out of a new foundation prior to the building move may be necessary depending on the sequencing of the proposed project. If the buildings are not immediately slated for rehabilitation at the receiver site, they would need to be secured in place following the relocation until a full rehabilitation could be completed. Intermediate protective measures could include mothballing of the building sections and the implementation of routine monitoring until a full rehabilitation could be completed.

RECEIVER SITE CONSIDERATIONS

To help maintain the historic integrity of the building in the case of off-site relocation, potential receiver sites should be reviewed based on specific site selection criteria outlined in this section. Due to the character-defining relationship of the building's historic use as a residence and retreat space, a future receiver site for the building would ideally recreate the feeling and setting of the original site. The configuration of the building on the site should be reflective of the historic spatial relationship of the building to the public right-of-way. Refer to **Table 1** and **Figure 5** - Annotated Existing Site Plan below, which summarize the building's current relationship to the existing site. Ideally, a potential receiver site would include as many of these attributes as possible, with priority being given to a site where the building's setbacks, orientation, and relationship to grade and the public right-of-way could be replicated as closely as possible to the historic condition.

Table 1 - Receiver Site Selection Criteria -- 482 University Avenue [APN 17530021]

Neighborhood Context & Zoning	Lot Size	Orientation to Public Right of Way	Setbacks & Building Placement on Lot	Setting
Early to mid-20 th century 1-2 story buildings with residential use and green spaces with mature trees.	4+ acres	Northeast-facing primary entry	200'+ setbacks all sides	Secluded Park-like Publicly owned Forested

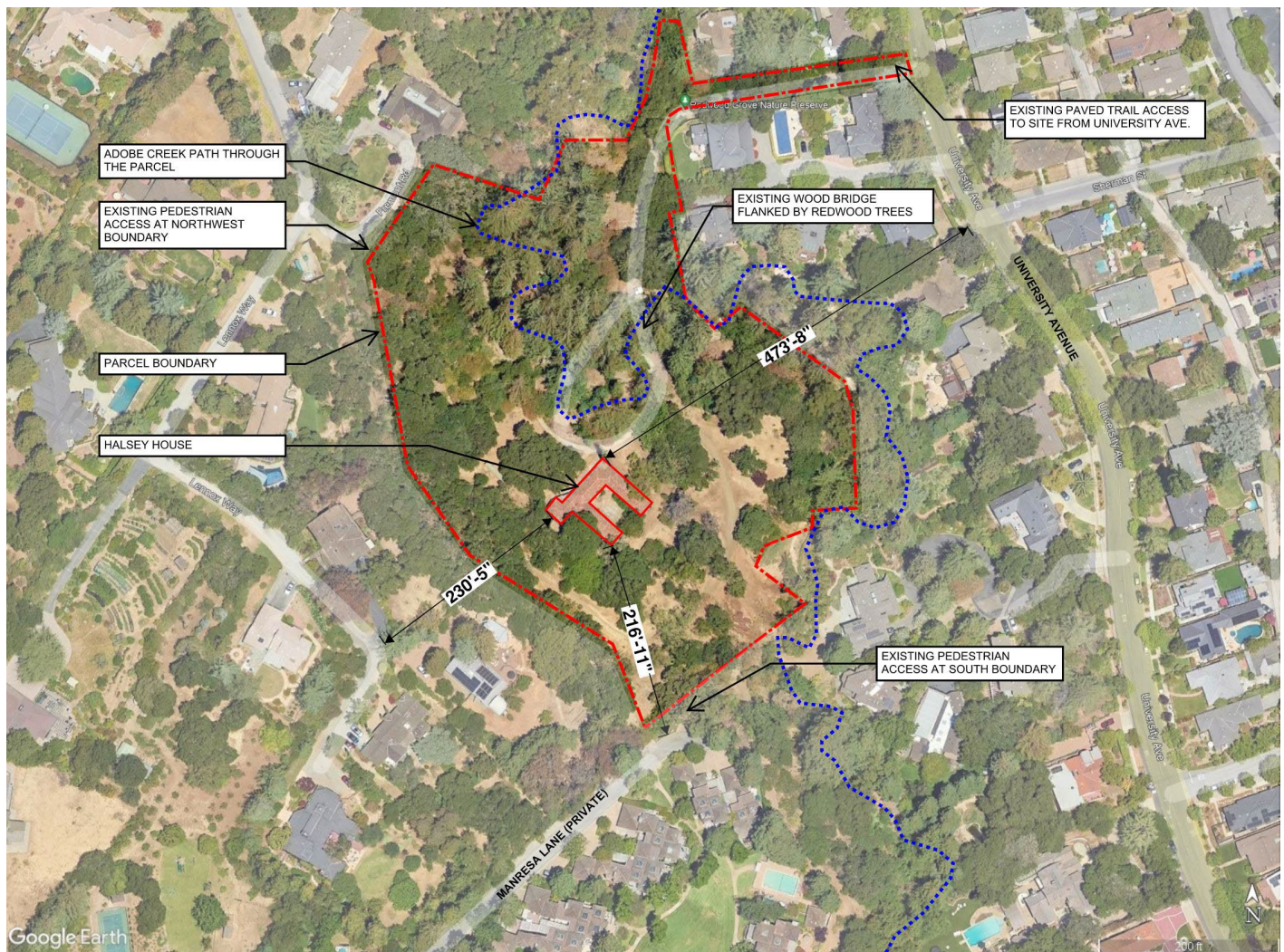


Figure 5 - Annotated Existing Site Plan – Image from Google Earth edited by Page & Turnbull.

EVALUATION OF POTENTIAL IMPACTS

The relocation of the historic resource would have significant implications for the Halsey House and its current historic status and eligibility for the California Register of Historic Places. The following statements are summarized from the HRE unless otherwise noted. The HRE provides a comprehensive analysis and evaluation of the resource according to the seven aspects of integrity set forth by the National Park Service and the California Office of Historic Preservation.

The HRE established that the existing site and its plantings are contributors to the historic resource's significance. It was determined that the Halsey House is eligible for the California Register under Criterion 1 (Events) at the state level of significance as an excellent example of the residential development patterns of Los Altos and for the establishment of the Redwood Grove, which is a unique property developed by Emma Halsey and her Japanese gardener, Mori, in the 1920s. The character-defining features of the historic resource include the original features, materials, and design elements of the residence and features of the landscape and site. The identified period of significance for the property begins in 1923 and includes any alterations undertaken during Emma Halsey's period of residence, which ended when she sold the property in 1945.

The identified character-defining features of the property include:

Exterior Features of The Halsey House

- Overall form and massing of the building (low, horizontal emphasis)
- Clay tile clad hipped roof
- Stucco cladding along exterior with a textured finish
- Original multi-lite wood sash windows, including three-over-one double-hung windows with ogee lugs, four-lite wood casement windows, six-lite wood casement windows, and six-lite wood sash slider windows
- Multi-light glazed French doors
- Multi-light sidelights flanking doors at the entrance porch and along south-facing wall of rear courtyard
- Tinted and stamped concrete at front entry porch and terrace
- Enclosed rear courtyard with tinted and stamped concrete patio at north end, built-in bench seating, fountain, and stone patio with steps at south end, and concrete stairs and metal railing at south end of west wing
- Original chimney with stucco cladding along south-facing wall of courtyard
- South courtyard wall with round arched wood plank door
- Semi-circular stone stairs along exterior of courtyard door in south courtyard wall
- Extant original metal fixtures including portions of original lamps and original door hardware at primary entrance

Interior Features of The Halsey House

- Original brick and tile fireplaces

- Original wood floors
- Plaster walls and ceilings
- Original wood panel doors
- Original hardware and wood trim of doors and windows
- Original wood baseboards and picture molding

Site

- Residence located deep within the approximately six-acre parcel and not visible from University Avenue
- Natural setting including:
 - Mature redwood trees
 - Mature oak trees
 - Adobe Creek
- Additional fruit trees, flowering trees, and plantings that appear to date from the period of significance

HISTORIC RESOURCE INTEGRITY CONSIDERATIONS

The Halsey House is considered individually eligible for the California Register under Criterion 1 for its association with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California. In order to qualify for listing in any local, state, or national historic register, a property or landscape must possess significance under at least one evaluative criterion and retain integrity. Seven aspects are used to evaluate a resource's integrity—location, setting, design, materials, workmanship, feeling, and association.¹ A property must possess most, or all, of these aspects in order to retain overall integrity. If a property does not retain integrity, it can no longer convey its significance and is therefore not eligible for listing in local, state, or national registers. The Halsey House currently retains all seven aspects of integrity, however four aspects—location, setting, feeling and association—could be impacted by the off-site relocation of the building. Integrity of design, materials, and workmanship would remain intact. In addition, if the building is removed from the site, the historic integrity of the Redwood Grove would also be impacted due to the interrelated historic significance of the residence and its setting. The following discussion summarizes the existing status of each aspect of integrity in relation to the Halsey House, and how each aspect could be impacted by relocating the building. A short discussion on the resulting impacts on the integrity of the Redwood Grove follows within the **Site Impact Considerations** section.

Location: The building has remained situated at its location of original construction since 1923 and the overall property has retained its location and its approximate size.

¹ U.S. Department of the Interior, National Park Service, National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (Washington, D.C.: National Park Service, 1995), 44.

The relocation of the Halsey House would likely adversely impact this aspect of integrity. The National Park Service states in the Moving Historic Buildings publication, dated 1979, that moving a historic structure irreparably diminishes or destroys its integrity of location and that when the decision is made to move a historic structure, careful consideration must be given to determining what aspect of the structure contributes most toward qualifying it as worthy of preservation.² However, the California Office of Historic Preservation notes that under special circumstances a resource might retain its eligibility for listing in the California Register if it was moved to prevent its demolition at its former location and if the new location is compatible with the original character and use of the historical resource. A historical resource should retain its historic features and be sited such that there is compatibility in orientation, setting, and the general environment of the resource at its new location.³

Setting: The building was erected within a large, six-acre piece of land and was sited to take advantage of the landscape and the curve of Adobe Creek. Early in the property's history, Emma Halsey and Mori, her gardener, planted many redwood saplings to complement the existing oak trees on the property. The landscaping work by Emma was continued into the early 1940s with the assistance of Yoshio Hongo, following Mori's retirement. These redwoods remain today and have grown to maturity. The Halsey House therefore retains its wooded and natural setting.

The relocation of the Halsey House would impact this aspect of integrity as the setting of the Redwood Grove was shaped and created by Emma Halsey and her gardeners from 1923 to 1945, reflecting the preferences of Emma Halsey in nurturing and developing the unique setting of the Halseys' home. While integrity of setting would be compromised by relocating the building, the selection of a receiver site that features mature redwoods and oaks may help to minimize this potential impact.

Feeling: The Halsey House retains integrity of feeling. The building retains the feeling of an early 1920s residence that was intended to serve as a year-round home for the Halsey family and was set within a wooded, lush landscape along Adobe Creek. The property retains its semi-rural feeling through its wooded setting that is removed from the main public right-of-way on University Avenue.

The relocation of the Halsey House could potentially impact and compromise the integrity of feeling of the historic resource. In order to avoid or minimize this potential impact, the receiver site should allow for the same deep setbacks and relation to the public right-of-way and be of a similar wooded environment.

Association: The Halsey House retains integrity of association. The building is significant for its residential development history and the development of Redwood Grove in the early 1920s by Emma Halsey and Mori. These associations continue to be represented through the retention of the

² U.S. Department of the Interior, National Park Service, Moving Historic Buildings (Washington, D.C.: National Park Service, 1979), 9.

³ California Office of Historic Preservation Technical Assistance Series #6 California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register) Sacramento: California Office of State Publishing, January 2011. Accessed February 13, 2024, <http://ohp.parks.ca.gov/pages/1069/files/technical/assistance/bulletin/6/2011/update.pdf>

residence's architectural characteristics that date to the time of Emma Halsey's period of residence and the retention of the property's landscape and the redwood trees that were transplanted to the site by Emma and Mori in the early 1920s.

The relocation of the Halsey House would impact the integrity of association of the resource given the close and interconnected significance between the building and the landscape. Although the architectural characteristics of the property would be retained in full and may continue be able to demonstrate the patterns of early residential development in Los Altos, the property's significance as it relates to the development of the Redwood Grove would be lost.

As outlined above, the Halsey House, if relocated, would likely lose integrity of setting and association, while integrity of location and feeling would be partially impacted.

SITE IMPACT CONSIDERATIONS

The historic resource is currently located in Redwood Grove Park, which is owned and managed by the City of Los Altos. The Halsey House and the larger property of Redwood Grove was listed as a City of Los Altos Historic Landmark in May 1981. The park is approximately 6.7-acres and is densely vegetated with trees including redwoods, oaks, fruit trees, and flowering trees planted by the original property owners. The park also features a natural stream, native plantings, picnic amenities, a boardwalk, and paved and unpaved pedestrian walkways. The relocation of the historic resource would require potential clearing of vegetation. This may necessitate removal or thinning of some of the mature redwood trees and new growth at the site, as well as clearing the route between the residence and the road. Adobe Creek crosses the site from the north boundary to the center point of the property's east boundary. The creek acts as the natural western boundary of the City of Los Altos. Use of heavy equipment and large vehicles would potentially impact the surrounding soils and creek banks. A procedure to restore any significant damage incurred or remove debris left at the site and along the route to the closest public street after the building relocation process is completed should be implemented.

As the Redwood Grove is a contributing feature of the identified historic resource, a brief discussion of its potential historic integrity if the Halsey House were to be removed from the site is warranted. As identified in the HRE, the historic resource consists of both the residence and the site. Removal of the residence from the Redwood Grove would result in the loss of most of the character-defining features that have previously been identified (refer to list of the character-defining features included above). The character-defining features related specifically to the site would be largely retained, with only the loss of the "Residence located deep within the approximately six-acre parcel and not visible from University Avenue." With the loss of the residence, however, the history of the Redwood Grove as a private and personal landscape created through the personal efforts of Emma Halsey and her gardeners would also be lost. This can be understood as a loss of integrity related to feeling and association. In addition, given the relative changes to the property since the end of the period of significance (1945), there have already been losses to the design and workmanship related to the

original efforts of Emma Halsey, Mori, and Yoshio. The impacts to these aspects of integrity would ensure that the identified historic resource (consisting of the deeply interconnected history of the residence and its setting) would no longer be eligible for individual listing on the California Register for the criterion discussed within the HRE. The Redwood Grove would likely be able to be listed on the Los Altos Historic Resources Inventory at a local level of significance as a unique landscape in Los Altos, but would require updated documentation and would benefit from a robust interpretive program. Interpretive efforts that retain the footprint of the Halsey House and its rear courtyard, along with an interpretive panel may assist in bringing the story of this unique place to a wider audience.

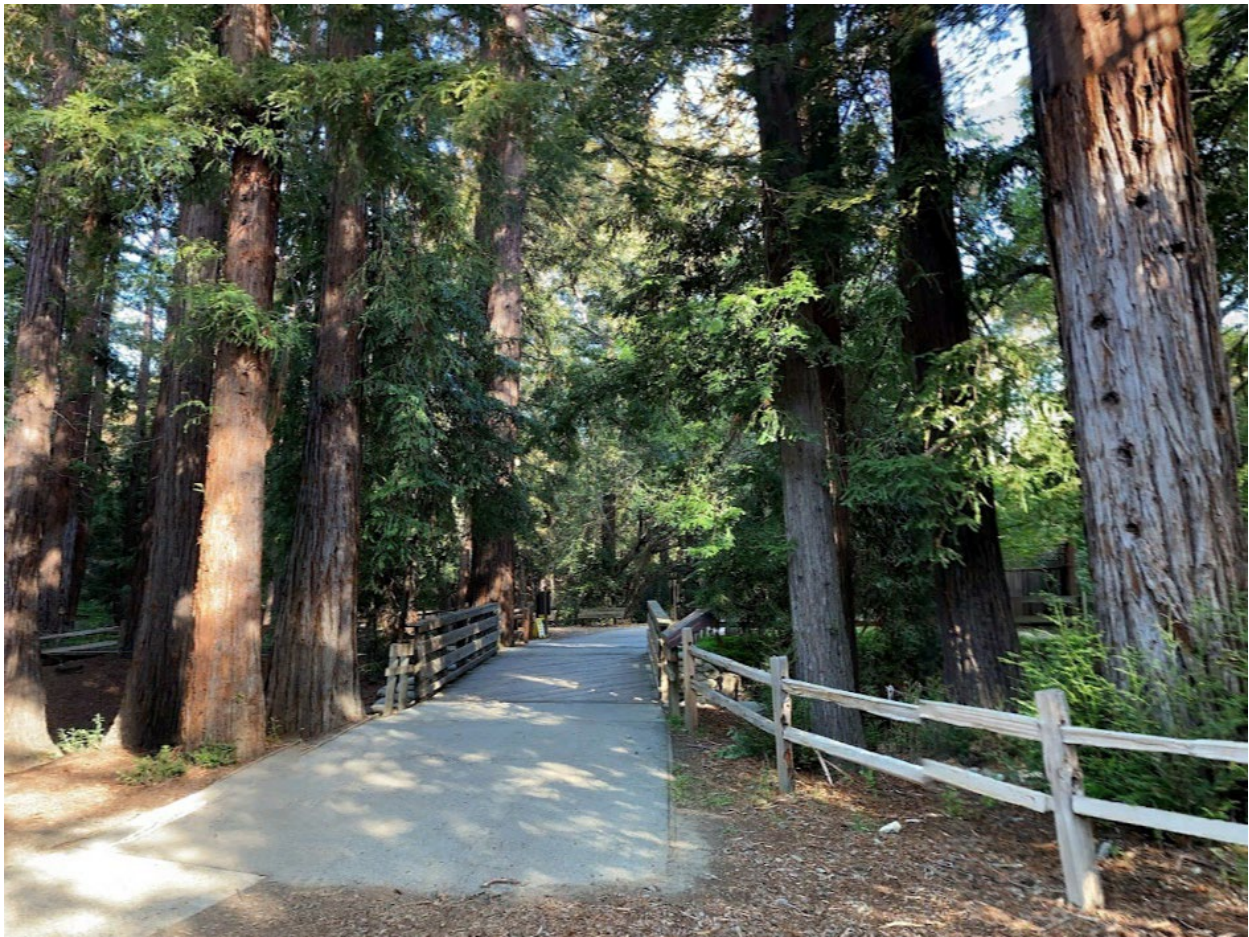


Figure 6 - View of the existing non-historic wood bridge and mature trees at northeast of the building.
Source: Google Earth.

CONCLUSION

This feasibility study has been prepared for the Halsey House located at 482 University Avenue, Los Altos, California which is eligible for listing in the California Register of Historic Resources. The report assesses the feasibility of relocating the building offsite, and the potential adverse impact to the historic resource and its current site in the case of a relocation on- or off-site. The report analyzes at a high-level the range of challenges and considerations required for the relocation process and preservation of the building. The relocation of the Halsey House would likely adversely impact several aspects of integrity currently retained by the historic resource including location, setting, feeling, and association. The resource might retain its significance as a good example of changing residential patterns in Los Altos if it is placed on a suitable receiver site, but would lose its significance related to the development of the Redwood Grove. With most of the aspects of integrity impacted, the resource could potentially lose its eligibility for the California Register. In addition to the impacts to the building, relocation could result in significant impacts to the natural resources on the site, including to native plantings, mature trees, and Adobe Creek. Considering the cumulative impacts to site and the integrity of the historic resource determined by this analysis, relocation does not appear to be a feasible alternative for the preservation of the Halsey House.

ATTACHMENT A: STRUCTURAL REPORT



Halsey House Structural Feasibility

The purpose of this feasibility study is to establish the feasibility of moving the existing Halsey House from its' current location in the Redwood Grove Preserve at 482 University Avenue in Los Altos California. There are three primary variables that control the feasibility of any move.

- 1) There will need to be a suitable receiver site within a reasonable distance. Without a receiver site that move cannot take place.

It is our understanding that a receiver site has not yet been identified. We will assume that one will be located.

- 2) There needs to be a suitable transportation route to move the structure from its current location to the receiver site.

During our site visit T&S Structural was able to Identify three possible transportation routes. In each route there will be low hanging branches that will need to be trimmed back and smaller trees that will need to be removed, there are also major obstructions that will limit the size of the sections that can be transported. The following are highlights of each route. Please see the attached Exhibit A for a diagram of each route and photographs of the major obstructions.

- The Main Entrance to the Preserve – The main entrance to the preserve is the first route that was investigated. The route is paved and relatively clear. The major obstruction is in the path over the bridge, where there are redwood trees on each side of the bridge. The clear distance between trees is 16'-2". These obstructions limit the width of any section to be transported to an approximate maximum of 14'-6" and to achieve the 14'-6" the bridge rails would need to be temporarily removed. Each section of the building would weigh approximately 8 tons with an additional 7 tons of shoring equipment which includes shoring beams and two power dollies. The bridge capacity is reported to be 8 tons and would not be capable of supporting this 15-ton load. A temporary bridge would be required to be constructed over the top of the existing bridge deck in order to use this route.
- The Trail out of the preserve to Manresa Drive – The trail itself is narrow but there is sufficient level area to the east of the trail to allow for transport. This would most likely cause damage to the native planting that is now being restored. There are three major obstructions in the route. At the entrance to the trail from the park there is a large old growth tree. In order to use the trail the section of the structure would need to go off the trail into the native planting to the east and around the tree to the east. At the other end of the trail as it exits to Manresa Drive the access narrows to 20'-9". At the intersection of Manresa Drive and University Avenue there is a large old growth tree that narrows the exit to University Avenue to 20'-6". These obstructions limit the width of any section to be transported to an approximate maximum of 19'-0".
- Through the fence onto Manresa Lane – If the fence is removed Manresa Lane is a paved route out of the area. This is a private road that is part of a planned development. The development is gated. The gates reduce the road width to 17'-4" at the intersection of

Manresa Lane and Manresa Drive. Once on Manresa Drive the same obstructions exist at the intersection of Manresa Drive and University Avenue. These obstructions limit the width of any section to be transported to an approximate maximum of 16'-0".

Based on these constraints the structure would need to be cut into a minimum of 14 sections

- 3) The integrity of the existing structure is very important. The process of disconnecting a structure from its' foundation, cutting it into manageable sections, lifting them, and transporting them to a new location is stressful. There needs to be adequate integrity for this process to take place without causing irreparable damage to the existing structure.

The Halsey House is a one-story wood frame single family residential that is constructed in a horseshoe shape with a central courtyard. The residence has been vacant for many years and the architectural finishes are showing signs of a lack of maintenance. There are a few locations where the roof has been leaking and the ceiling finishes have deteriorated and fallen. Despite the architectural damage the overall structure is in good condition.

Based on the constraints of each route out of the preserve and the limited size of the sections to be transported, in our opinion the feasibility of successfully moving the structure is very low.

EXHIBIT A

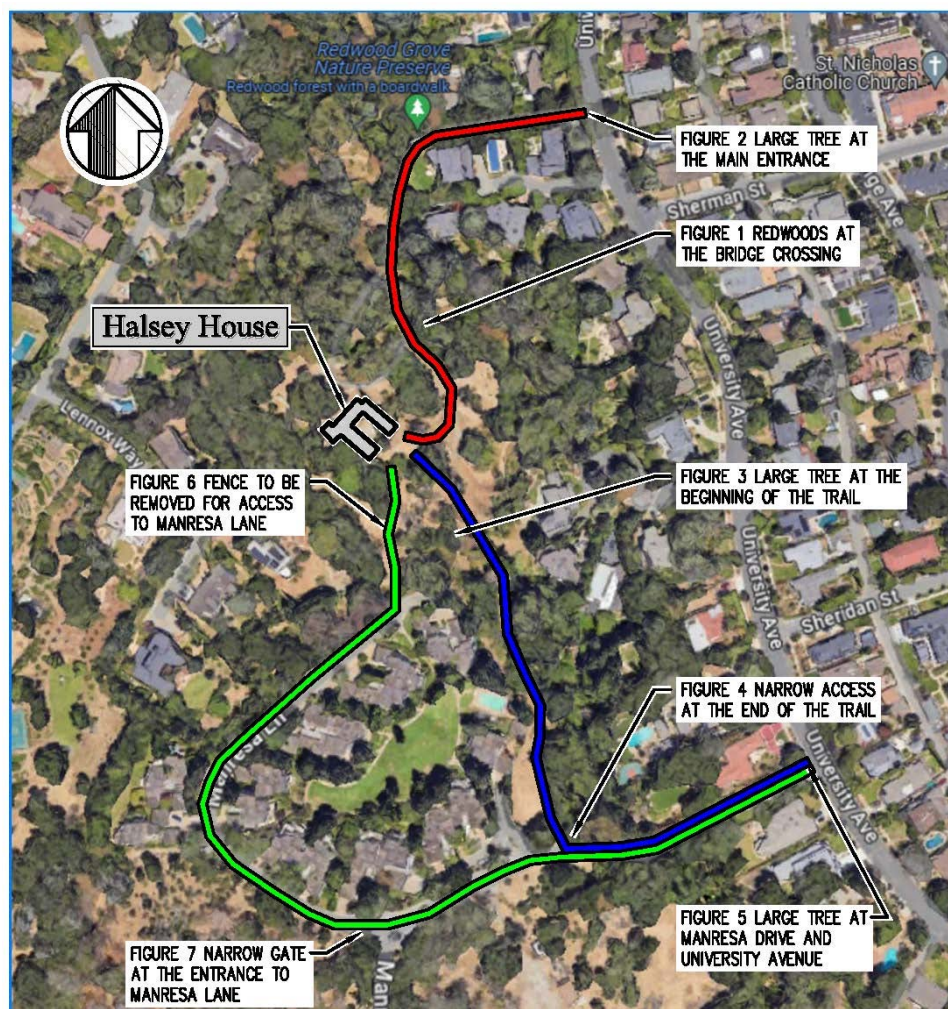




Figure 1



Figure 2



Figure 3



Figure 4



Figure 5



Figure 6



Figure 7

From: [Jim Wing](#)
To: [Public Comment](#)
Cc: [Gabriel Engeland](#)
Subject: Halsey House Study Session
Date: Saturday, June 20, 2026 8:13:01 AM

Los Altos Mayor Meadows and Distinguished Council Members,
Subject: Halsey House June 23 2026 CEQA Report Study Session

Staff and consultants have done a good job preparing this CEQA report. Following is some of my comments on items that need revision or need to be added to report. I plan to submit a legal CEQA letter to Los Altos Saff before June 27, 2026 that has all of my items.

- **Attachment 6 -Appendix E Geotechnical Investigation**
- No evidence of discussion on active septic tank or its drain field that extends almost to Adobe Creekbank. In early springtime, I always see Adobe Creek green algae just downstream. A soil core sample was drilled April 2024 by consultants in septic tank drain field, but no data is in report. This data is important because it decides if Federal Clean Water Act mitigation is required.
- No evidence of Halsey House crawl space soil contamination data after more than 50 years of rat habitation.
- **6.1.2 Abandonment of Existing Utilities.** Add statement that PG&E has removed all electrical power lines from Halsey House and did disconnect at electrical power pole located on Redwood Grove west ridge. If PG&E electrical power is needed in the future, it will require undergrounding down an environmentally sensitive west Redwood Grove ridge.
- **6.1.2 Impacts of the San Francisco Dusky-Footed Woodrat.** Since consultants' investigation in April 2024, woodrats have abandoned nests near Halsey House and moved to about 108 feet to Redwood Grove south border. This item should be deleted from report.
- **1.1.2 Demolition Details.** Construction / Demolition equipment access would need to cross wood Adobe Creek Bridge that was built over 45 years ago and rated at 8 ton when new. Report states that all equipment / loads would be in the 6 to 7+ ton range. In the past 20 years, the bridge main wood support beams show evidence of "stress failure" at point were ends of beams rest on cement footing. When heavy loads now cross the bridge, you can measure failure by "stress dusting". Prior Los Altos Public Works Director, observed and commented on this ever-increasing problem. County Fire Department has also made the same observation and were going to revise their emergency fire access procedures to route 7.5-ton pump truck to backside of Hasey house via Manresa Way and use its end of road fire hydrant.

Two mature redwood trees, one on each side of bridge restrict width of truck loads /

equipment. If proper space to protect redwood trees from truck loads / equipment can not be maintained, authorization to use private road Manresa Way will be needed.
Thank You for your consideration, Jim Wing Milverton Road Los Altos Ca.

From: [Roberta Phillips](#)
To: [Public Comment](#); [City Council](#)
Subject: Halsey House study session 6/23/2026
Date: Tuesday, June 23, 2026 11:10:38 AM

Dear Council Members

I received an email from a friend stating " **PUBLIC COMMENT PERIOD:** **From Thursday, June 11** to Monday, July 27 at 5:00 pm the public and all affected agencies are hereby invited to review the Draft EIR and submit written comments.

1. If I want to make a public comment where do I send the comment?
2. If the draft EIR was not available on the City website until June 18th then how can people comment before the report was available?
3. How were the residents notified? Was It in the City Manager's Weekly Update?(Our City Heights Newsletter) ?
4. How much would it cost to rehabilitate Halsey House?

Would you please reply back to me in writing.

Thanks

Roberta Phillips

From: baeric@earthlink.net
To: [Public Comment](#)
Subject: [External Sender]study session june 23 2026 halsey house
Date: Tuesday, June 23, 2026 12:54:26 PM

Halsey House Draft EIR comments

An Environmental Impact Report (EIR) in California must include a clearly stated purpose and project description. Under the California Environmental Quality Act (CEQA), the environmental analysis relies on knowing exactly what the building or site is intended to be used for. The project here is clearly described as “demolition.” At no time has it been determined that the Halsey House should be demolished. City Council sought an EIR with alternative options for Halsey House, not a demolition project. Therefore, this report is not valid.

A historic landmark requires evaluation of alternatives in great detail including preservation, rehabilitation, restoration or reconstruction. The City cannot not only look at a historic resource thru the lens of what its use is or could be. If it is deemed historic, it has intrinsic worth and is protected by CEQA.

In fact, there are a range of possible uses for the building, including its most recent use as a nature center and facility for youth nature programs. Other potential uses include as a small performance center, yoga and meditation facility or perhaps even as an office facility for city staff, or Grassroots Ecology operations at the preserve.

When Halsey House was “mothballed,” the rationale was that the City did not have funds to properly repair it. In the ensuing years, there was little to no maintenance, even when reports identified critical and urgent repairs necessary to preserve and stabilize the building.

The City has approximately \$16M in its Park in Lieu/Park Impact fund, yet none of those funds have been allocated for critical repairs to Halsey House. This speaks to the City’s de facto demolition by neglect and failure to properly prioritize use of park funds on existing parks and facilities.

Given the City Council’s proven carelessness with preservation efforts of historic buildings, the best alternative at this time might be to mothball Halsey House once again until such time as a responsible council properly addresses the significance of this historic landmark and finds a path forward that results in preserving an important contributor to Los Altos history.

The only reason Redwood Grove exists is because of the Halsey family. To tear the house down, especially without a plan to recognize its importance in situ, is an affront to the history and legacy of the Halseys and our community. We deserve better. And so do future generations of youths who should have the ability to experience nature through an immersive experience with the Halsey House and its legacy as an integral part.

Jon Baer, President

Friends of Historic Redwood Grove



Virus-free www.avg.com

From: [PALLA Support](#)
To: [Public Comment](#)
Subject: Public Comment Council Special Meeting Study Session 6-23-26 Item #1 Halsey House Project Draft EIR
Date: Tuesday, June 23, 2026 1:13:17 PM
Attachments: [Halsey House reso. no. 2023-27-signed.pdf](#)

Dear Council Members,

On April 25, 2023, the City Council conducted a public Study Session regarding the future of the Halsey House and subsequently adopted **Resolution No. 2023-27**.

Resolution No. 2023-27 states:

"At the conclusion of the Study Session, City Council **identified two options (total demolition and adaptive reuse) and directed staff to proceed with CEQA analysis** for these two options and the alternatives."

The Resolution further states:

"When the environmental review is complete, Council will have information about the environmental consequences of different options concerning the Halsey House to provide further direction to staff."

The Council did not authorize environmental review of a project defined as "demolition." Rather, the Council directed environmental review of multiple options concerning the future of the Halsey House, including total demolition, adaptive reuse, and other alternatives, so that the Council could subsequently determine a preferred course of action.

The Draft EIR before the Council is demolition of the Halsey House.

Accordingly, the project filed, circulated, and evaluated for environmental review is materially different from the scope authorized by the City Council in Resolution No. 2023-27.

This distinction is not merely semantic. Under State Law and CEQA, the project description establishes the scope of environmental review and must accurately reflect the action authorized by the lead agency. Resolution No. 2023-27 directed environmental review of multiple options concerning the future of the Halsey House. The Draft EIR instead evaluates a project whose stated action is demolition of the Halsey House.

This is not a routine comment on the adequacy of the Draft EIR's analysis, mitigation measures, or alternatives. It is a threshold issue concerning the fundamental scope of the project being evaluated.

Therefore, the Council must direct the Draft EIR to be corrected, revised, and recirculated with a project description, project objectives, and

environmental analysis consistent with Resolution No. 2023-27.

Because the environmental review has been prepared and circulated based on a project definition that differs from the action authorized by the City Council, the deficiency cannot be remedied through responses to comments alone and requires reconsideration of the underlying environmental analysis before the Draft EIR proceeds further.

Sincerely,

Members of Preservation Action League Los Altos

RESOLUTION NO. 2023-27

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LOS ALTOS
APPROPRIATING FUNDING FOR ENVIRONMENTAL REVIEW FOR THE
HALSEY HOUSE, AUTHORIZING THE CITY MANAGER TO EXECUTE AN
AGREEMENT WITH AN ENVIRONMENTAL CONSULTANT IN AN AMOUNT
NOT TO EXCEED \$200,000, AND FINDING THAT THE COUNCIL'S ACTION IN
APPROVING THIS RESOLUTION IS EXEMPT FROM REVIEW UNDER THE
CALIFORNIA ENVIRONMENTAL QUALITY ACT**

WHEREAS, at April 25, 2023, Study Session, the City Council received information and a status update on the Halsey House; and

WHEREAS, at the conclusion of the Study Session, City Council identified two options (total demolition and adaptive reuse) and directed staff to proceed with CEQA analysis for these two options and the alternatives; and

WHEREAS, when environmental review is complete, Council will have information about the environmental consequences of different options concerning the Halsey House to provide further direction to staff; and

WHEREAS, the City Council's action in approving this resolution is statutorily exempt from review under CEQA pursuant to CEQA Guidelines Section 15262 (Feasibility and Planning Studies);

NOW THEREFORE, BE IT RESOLVED, that the City Council of the City of Los Altos hereby:

1. Finds that the foregoing recitals are true and correct.
2. Appropriates \$200,000 from the General Fund to Project# CF-01004 for CEQA analysis.
3. Authorizes the City Manager to execute a Professional Services Agreement in an amount not-to-exceed \$200,000 with an environmental consultant to perform environmental review as previously directed by the City Council.
4. Authorizes the City Manager to take such further actions as may be reasonably necessary to implement the objects and purposes of this resolution, provided that any expenditure beyond that appropriated and authorized herein shall require approval from the City Council.

I HEREBY CERTIFY that the foregoing is a true and correct copy of a Resolution passed and adopted by the City Council of the City of Los Altos at a meeting thereof on the 9th day of May, 2023, by the following vote:

AYES: Dailey, Fligor, Meadows, Weinberg
NOES: Lee Eng
ABSENT:
ABSTAIN:



Sally Meadows, MAYOR

Attest:



Melissa Thurman, MMC
CITY CLERK

From: [Tagfam](#)
To: [Public Comment](#)
Subject: PUBLIC COMMENT AGENDA ITEM 1 [Halsey House Project Draft EIR Study Session] - [June 23, 2026]
Date: Tuesday, June 23, 2026 3:34:37 PM

Dear Los Altos City Councilmembers,

This Council authorized review of the Redwood Grove Halsey House for adaptive reuse as a nature center for educational and recreational programming. I request that the Council rescope the EIR so adaptive reuse and demolition alternatives are evaluated with equal rigor. The analysis now before the Council appears to be scoped for demolition only, without a balanced evaluation of alternatives and their relative environmental, historic, and community impacts.

Since 2008, the Halsey House has remained vacant, unused, and insufficiently maintained to the point that demolition is now being considered. As the report acknowledges, the Halsey House is a local Historic Landmark and is eligible for the California Register of Historic Resources (CRHR); accordingly, it is a historic resource under CEQA. A project description that evaluates only demolition is inadequate where adaptive reuse was previously authorized for review and remains a feasible alternative for preserving the site's historic and public value.

I urge the Council to rescope the EIR to provide a fair and complete alternatives analysis, including adaptive reuse as a nature center, before taking further action on demolition. I also request that the City review the governance and scoping process that led to a demolition-focused analysis, and that both the Parks Commission and Historic Commission, for as long as it remains, be included before any final decision is made regarding this valuable City of Los Altos resource.

Sincerely,

Valerie Taglio