

Town of Atherton

2019 General Plan Update Project

DRAFT
INITIAL STUDY/MITIGATED NEGATIVE
DECLARATION

Prepared by:
Town of Atherton
Planning Department
91 Ashfield Road
Atherton, CA 94027

April 4, 2019

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Mitigated Negative Declaration

PROJECT DESCRIPTION AND BACKGROUND:

Project Title:	2018-2019 General Plan Update
Lead agency name and address:	Town of Atherton, 91 Ashfield Road, Atherton, CA 94027
Contact person and phone number:	Neal Martin, Planning Consultant, (650) 752-0544
Project Location:	Town of Atherton
Project sponsor's name and address:	Town of Atherton
General plan description:	Various
Zoning:	Various
Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation.)	See Project Description below
Surrounding land uses and setting; briefly describe the project's surroundings:	The Project area includes the entire Town of Atherton. The Town is bounded by the cities of Redwood City, Menlo Park, and Woodside and unincorporated areas of San Mateo County. The land use is primarily low density residential with a number of public and private schools interspersed. Most privately owned land in Atherton is developed. See Appendix A.
Other public agencies whose approval is required (e.g. permits, financial approval, or participation agreements):	None
Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?	No

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

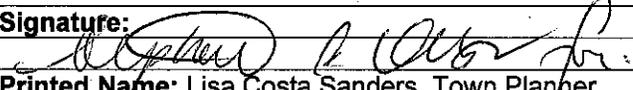
The environmental factors checked below would be potentially affected by this project. Please see the checklist beginning on page 8 for additional information.

<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture and Forestry	<input checked="" type="checkbox"/>	Air Quality
<input type="checkbox"/>	Biological Resources	<input checked="" type="checkbox"/>	Cultural Resources	<input checked="" type="checkbox"/>	Geology/Soils
<input type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Hazards and Hazardous Materials	<input checked="" type="checkbox"/>	Hydrology/Water Quality
<input type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Mineral Resources	<input checked="" type="checkbox"/>	Noise
<input type="checkbox"/>	Population/Housing	<input type="checkbox"/>	Public Services	<input type="checkbox"/>	Recreation
<input type="checkbox"/>	Transportation/Traffic	<input type="checkbox"/>	Tribal Cultural Resources	<input checked="" type="checkbox"/>	Utilities/Service Systems
<input type="checkbox"/>	Mandatory Findings of Significance				

DETERMINATION:

On the basis of this initial evaluation:

<input type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature: 	Date: 4-4-19
Printed Name: Lisa Costa Sanders, Town Planner	For: Town of Atherton

MITIGATION MEASURES: The measures listed below are included in the Project to avoid potentially significant effects.

Mitigation Measure AIR-1: In order to reduce impacts on air quality resulting from construction, future new developments shall implement the following measures:

Basic Construction Management Practices. The Project shall demonstrate proposed compliance with all applicable regulations and operating procedures prior to issuance of demolition, building or grading permits, including implementation of the following BAAQMD "Basic Construction Mitigation Measures".

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Mitigation Measure CUL-1: In order to reduce impacts on historic resources, future new developments shall implement the following measure:

In the event a future specific project is proposed that may have the potential to cause a significant adverse change in the significance of a historic resource, the Town shall require an evaluation of the resource by a qualified professional. The evaluation shall be conducted according to the Secretary of the Interior's Standards for evaluation of historic resources. Project specific mitigation measures shall be included and implemented in accordance with the Secretary's Standards.

Mitigation Measure CUL-2: In order to reduce impacts on archaeological resources, future new developments shall implement the following measure:

In the event that subsurface archaeological and/or paleontological resources are encountered during the course of grading and/or excavation, all development shall temporarily cease within 25 feet of the find until the Town's Planning Department is contacted and a qualified archaeologist or paleontologist assesses the resources and makes recommendations for their disposition. Construction activities could continue in areas more than 25 feet away. If any findings are determined to be significant by the archeologist, they shall be subject to scientific analysis; duration/disposition of archaeological specimens as agreed to by the Native American community, land owner, and the Town. This report would be filed with the Northwest Information Center.

Mitigation Measure HYD-1: In order to reduce impacts related to erosion and sedimentation, future new developments shall implement the following measures:

- Schedule grading and excavation work for dry weather only.
- Stabilize all denuded areas, install and maintain temporary erosion controls (such as erosion control fabric or bonded fiber matrix) until vegetation is established.
- Seed or plant vegetation for erosion control on slopes or where construction is not immediately planned.
- Protect storm drain inlets, gutters, ditches, and drainage courses with appropriate BMPs, such as gravel bags, fiber rolls, berms, etc.
- Prevent sediment from migrating offsite by installing and maintaining sediment controls, such as fiber rolls, silt fences, or sediment basins.
- Keep excavated soil on the site where it will not collect into the street.
- Transfer excavated materials to dump trucks on the site, not in the street.
- Contaminated Soils: If any of the following conditions are observed, test for contamination and contact the Regional Water Quality Control Board:
 - Unusual soil conditions, discoloration, or odor.
 - Abandoned underground tanks.
 - Abandoned wells.

- Buried barrels, debris, or trash.

Mitigation Measure HYD-2: In order to reduce impacts related to dam failure inundation, future new developments shall implement the following measures by the dam owner in compliance with SB 92 (2017):

- Submit Dam Failure Inundation Maps to the CA Department of Water Resources in accordance with the DWR schedule.
- Submit an Emergency Action Plan to the California Office of Emergency Services subsequent to submittal of the Dam Failure Inundation Maps.
- Submit updated plans and maps every 10 years.
- Coordinate the Emergency Action Plans with the affected local governments.

Mitigation Measure NOISE-2: In order to reduce noise impacts, future new developments shall implement the following measure:

Recognizing that aircraft and any associated issues thereto are federally regulated, the Town will work with nearby communities and other interested agencies to bring about a reduction of noise levels by private, military, public and commercial airplanes and helicopters.

Project Description

Under California law (Government Code Section 65300 et seq.), every City and County is required to have a General Plan that functions as the overarching, comprehensive and long range policy document. The Atherton General Plan was reviewed and updated in 2002. Since that time, the Housing Element was updated twice; once in 2007 and again in 2014. Because the Housing Element is current, it is not part of this update process. This update includes the Land Use Element, Circulation (including Scenic Highways) Element, Open Space and Conservation Element, Community Safety Element and Noise Element. The General Plan Update is a long-range planning document that guides the orderly growth and development of the Town, which is defined to be all properties within the Town's boundary limits. The General Plan Update is a policy document to direct the Town's vision of its future and establishes a policy framework to govern decision-making concerning the physical development of the community. The General Plan update does not authorize any specific development project, other form of land use approval of any kind, public facilities, or capital facilities expenditures or improvements to be developed. Although the General Plan Update includes changes and additions to the goals, objectives, and policies to achieve consistency with current state and local regulations and address the current practices of the Town, the majority of the General Plan continues those goals, objectives, policies, implementation measures, and standards in the current General Plan. The recommended modifications and additions to the General Plan are not intended to create changes to the physical environment that have significant environmental impacts that cannot be avoided or mitigated.

This General Plan Update ("Project") IS/MND is a program-level environmental document and includes analysis that provides a foundation for subsequent environmental review. No specific development projects are proposed at this time or analyzed herein. Future projects within the Town boundary are subject to the appropriate project-level environmental review and permitting by the Town of Atherton.

Key revisions and additions to the proposed "Project" include:

- Land Use Element – changes reflecting the proposed new Civic Center, the addition of proposed Greenways, revisions describing Silicon Valley Clean Water treatment facilities, updates relate to solid waste disposal and recycling, the addition of a section related to the Climate Action Plan,

and policies supporting these changes and additions. However, the basic land use pattern, designations and areas delineated are unchanged from the 2002 Land Use Element. Land use goals, objectives and policies were updated.

- Circulation Element – new text was added about the San Mateo County Congestion Management Program, the Grand Boulevard Initiative and Greenway Concept, Complete Streets Policies, the Bicycle and Pedestrian Master Plan, Safe Routes to Schools, Green Streets, the Neighborhood Traffic Management Program, the Traffic Counts Program, the Transportation Demand Management Program, and the Climate Action Plan. Updated discussions were included about Rail Transportation, the Caltrain Electrification Project, High-Speed Rail, Bus Transportation and Scenic Roadways. The Local Street Classification System was updated and a Level of Service grading system was added to describe the operational status of the local roadway network. Level of Service Standards of Significance under CEQA were proposed. Circulation goals, objectives and policies were updated.
- Open Space and Conservation Element – An inventory of open space lands was added. New text was added expanding the description of open space for natural resources, managed production of resources, outdoor recreation, public safety, military and tribal resources in the Open Space Element. The Conservation Element was updated to include a discussion of Santa Clara and San Mateo Plain Groundwater Sub-basins and Green Infrastructure under the topic of Water and its Hydraulic Force; coastal oak woodland under the topic of Forests; Soils; Atherton Channel, Town-wide Drainage Studies, San Mateo Countywide Water Pollution Prevention Program, erosion and sedimentation control, and the Bayfront Canal/Atherton Channel Flood Protection and Restoration Project, under the topic of Rivers, Other Water and Floodwater Management; Harbors and Fisheries; Wildlife and Habitats; Minerals and Other Natural Resources; historic buildings, structures and artifacts under the topic of Cultural Resources; and the Town Climate Action Plan. Open space and conservation goals, objectives and policies were updated.
- Community Safety Element – The seismic hazards description was updated including Alquist-Priolo Earthquake Fault Zones, surface rupture, ground shaking, ground failure, tsunami, seiche, dam failure, slope instability, land subsidence, and liquefaction. New sections were added describing flooding hazards and potential, urban and wildland fire potential. A section was added describing the emergency operations plan administered by the Atherton Police Department and the Menlo Park Fire Protection District. A section was added related to climate change. Emergency evacuation routes were updated. Community safety goals, objectives and policies were updated.
- Noise Element – The Atherton noise environment description was updated, including new measurements of existing noise levels and mapping of existing noise contours and projections of future (2040) noise levels and mapping of future noise contours. A discussion was added related to noise from aircraft over-flights, Caltrain electrification and High-Speed Rail. Goals, objectives and policies related to Noise were updated.

Initial Study - CEQA Environmental Checklist

This checklist identifies physical, biological, social and economic factors that might be affected by the proposed project. In many cases, background studies performed in connection with the projects indicate no impacts. A NO IMPACT answer in the last column reflects this determination. Where there is a need for clarifying discussion, the discussion is included either following the applicable section of the checklist or is within the body of the environmental document itself. The words "significant" and "significance" used throughout the following checklist are related to CEQA, not NEPA, impacts. The questions in this form are intended to encourage the thoughtful assessment of impacts and do not represent thresholds of significance.

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
I. AESTHETICS: Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Aesthetics Description

a) – d) **No Impact** - The Project is not located in a major viewshed, therefore, would not have a substantial adverse effect on a scenic vista. The Project is not located within a state scenic highway. The Project would not substantially degrade the existing visual character or quality of the site. The Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. The Project would not permit any greater amount of building area than currently allowed. There would be no change in the building square footage or floor area permitted on a lot; or cumulatively, no changes in building height and no change in setbacks.

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Agriculture and Forest Description

a-e) **No Impact** – There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance in the project area. There are no agriculture or forest zones in the project vicinity. Neither are there any Williamson Act contracts within the Town. There are no agricultural or forest uses in Town proposed for conversion to non-agricultural or non-forest uses.

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Air Quality Description

a) **No Impact** - The project consists of an update to the existing General Plan. No changes are proposed to the land uses, their pattern, intensity or extent. The only changes proposed to the circulation system involve redesignation of certain street classifications to achieve consistency with designations in adjacent jurisdictions or to reflect actual use. The Town is currently “built-out” in accordance with the existing 2002 General Plan and most development activities consist of demolishing older homes and replacing them with newer, larger homes. The Town population is expected to remain stable and there are no new large employers expected to locate in the Town. Many of the Bay Air Quality Management District’s (BAAQMD) Clean Air Plan’s control measures are targeted to area-wide improvements, large stationary source reductions, or large employers and these are not applicable to the proposed project. The project would also not impede the implementation of control measures. There would be no impact in relation to inconsistency with the Clean Air Plan.

b) **Less-than-Significant Impact with Mitigation** – Although the Town is “built-out” with residential and institutional (e.g. schools) uses, there are single family residential projects consisting of demolishing older homes and replacing them with newer, larger homes. Typically, there are 25 – 30 such projects in various stages of demolition and/or construction during the year. Because most projects involve the demolition of one house and its replacement, there has been an annual net decrease in single family homes of 0.5 homes/year over the last 5 years. However, the Town has been encouraging the inclusion of Accessory Dwelling Units in new home construction. There has been an annual net increase of 11 new Accessory Dwelling Units constructed year over the last 5 years.

Implementation of the General Plan Update project would involve demolition, excavation and site preparation, and building erection on individual project basis. Although these construction activities would be temporary, they would have the potential to cause both nuisance and health-related air quality

impacts. PM₁₀ (respirable particulate matter) is the pollutant of greatest concern associated with dust. If uncontrolled, PM₁₀ levels downwind of actively disturbed areas could possibly exceed State standards. In addition, dust fall on adjacent properties could be a nuisance. Construction impacts would also be a source off exhaust emissions from construction vehicles, which contribute to regional emission levels.

BAAQMD has developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether a proposed Project could result in potentially significant construction-related emissions impacts. If all of the screening criteria are met by a proposed Project, it can be confidently determined that the Project would be below threshold levels without the need to perform a detailed quantification of the Project's emissions. BAAQMD lists a screening size of 114 dwelling units for single-family land use type projects. Implementation of the General Plan Update results in approximately 30 single-family dwelling unit projects in various stages of demolition and/or construction occurring in a single year. Therefore, the Project would not be anticipated to result in emission of criteria pollutants during the construction period over threshold levels.

Construction-period emissions levels are below BAAQMD thresholds. However, BAAQMD recommends implementation of construction mitigation measures to reduce construction-related emissions for all projects, regardless of the significance level of construction-period impacts. These basic measures are included in **Mitigation Measure AIR-1**, below and would further reduce construction-period criteria pollutant impacts.

Demolition and earth-moving activities can also result in fugitive dust, which contributes to particulate matter levels. BAAQMD does not have a threshold of significance for fugitive dust impacts, but instead regards fugitive dust impacts as mitigated if appropriate management practices are implemented, as outlined in **Mitigation Measure AIR-1**.

Mitigation Measure AIR-1: In order to reduce impacts on air quality resulting from construction, future new developments shall implement the following measures shall be implemented:

Basic Construction Management Practices. The Project shall demonstrate proposed compliance with all applicable regulations and operating procedures prior to issuance of demolition, building or grading permits, including implementation of the following BAAQMD "Basic Construction Mitigation Measures".

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

The BAAQMD significance thresholds for construction dust impacts are based on the appropriateness of construction dust controls. With implementation of the Basic Construction Mitigation Measures listed in Mitigation Measure AIR-1, impacts related to construction period emissions would be considered less than significant with mitigation. Because construction-period emissions do not exceed applicable criteria pollutant significance thresholds, additional construction mitigation measures would not be required to mitigate impacts.

Emissions from operation of the project could cumulatively contribute to air pollutant levels in the region. These air pollutants include ROG and NO_x that affect ozone levels (and to some degree – particulate levels), and PM₁₀ and PM_{2.5}.

BAAQMD lists an operational criteria pollutant screening size of 325 dwelling units for single-family land use type projects. Based on past data, the General Plan Update project is expected to result in no net increase in single-family dwelling units and an annual net increase of 11 new Accessory Dwelling Units. The General Plan target date is 2040. Therefore, there could be up to 231 new Accessory Dwelling Units added to the Town's housing stock during the life of the project. This is well below the screening size and therefore not anticipated to result in emissions of criteria pollutants over threshold levels during operations. Therefore, the Project would have a less-than-significant impact on operational criteria pollutants and regional air quality.

BAAQMD presents the separate operational screening level that localized carbon monoxide concentrations should be studied at affected intersections where traffic is increased to more than 44,000 vehicles per hour (or 24,000 vehicles per hour where mixing is substantially limited, such as in a tunnel). This screening level represents the volume of traffic at which a significant impact related to carbon monoxide would be possible. Based on traffic volumes in the vicinity, it is not anticipated the project will affect intersections of that volume. Therefore, the impact related to carbon monoxide emissions is less than significant.

c) **No Impact** - Additional analysis to determine cumulative air quality impacts of the Project is not necessary. In developing thresholds of significance for air pollutants, BAAQMD considered the emission levels at which a project's individual emissions would be cumulatively considerable. Because the Project emissions during construction and operation would not exceed these thresholds, they would not have a cumulatively considerable effect. There would be no additional significant cumulative air quality impacts.

d) **Less-than-Significant** – For the purpose of assessing impacts of a proposed Project on exposure of sensitive receptors to risks and hazards, the threshold of significance is exceeded when the project-specific cancer risk exceeds 10 in one million, the non-cancer risk exceeds a Hazard Index of 1.0 (or cumulative risk of 100 in one million or a Hazard Index of 10.0 respectively is exceeded), and/or the annual average PM_{2.5} concentration would exceed 0.3 µg/m³. Examples of sensitive receptors are places where people live, play or convalesce and include schools, hospitals, residential areas and recreation facilities.

Implementation of the General Plan Update Project could result in approximately 30 demolition and new home construction projects occurring annually. These individual projects would be located in proximity to other residential properties, which are considered sensitive receptors when it comes to health risks. However, the individual projects are randomly located throughout Town and the demolition and construction phases are separated by time (most projects take 2 -3 years to complete). For example, there may be no more than two demolitions occurring in an average month. Therefore, the exposure of individuals considered sensitive receptors would be substantially below the thresholds of significance and would be less-than-significant.

Following construction, none of the proposed General Plan land uses would be considered a significant stationary source of air toxins. There would be no impact related to the operational period health risks.

e) **No Impact** - Typical sources of objectionable odors include chemical plants, sewage treatment plants, large composting facilities, rendering plants, and other large industrial facilities that emit odorous compounds. Development of the project would not include any activities that are typical sources of objectionable odors. Other land uses near the project area are not those typically associated with objectionable odors. Therefore, the Project would have no impact in relation to odors.

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES: Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Biological Description

a-f) **No Impact** - The buildings and access drives contemplated as part of the proposed Project are currently permitted by the existing General Plan and existing zoning. The proposed Project would not allow larger buildings. It would not change the location where the buildings or access drives can be built. The identified sites suitable for development are almost all currently developed with buildings, structures, landscaping and pavement and, because of this, are highly unlikely to support any species identified as a candidate, sensitive or special status species. Local policies and State and federal regulations prohibit development on or near riparian habitat and other sensitive natural communities. The identified sites suitable for development are not near any federally protected wetlands nor would they interfere with the

movement of any native resident migratory fish or wildlife species. There is no habitat conservation plan or natural community conservation plan existing in the project area. Any heritage tree in conflict with a new building or access drive would require Planning Commission approval and site-specific analysis.

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES: Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Cultural Resources Description

a) **Less than Significant with Mitigation** – The General Plan Update does not include any proposal that would cause a significant adverse change in the significance of a historic resource. The Open Space and Conservation Element contains policies to encourage the preservation of both private and public historical resources and artifacts for the benefit of future generations. However, the General Plan Update Project is necessarily broad in scope and future specific projects that may have the potential to cause a significant adverse change in the significance of a historic resource may not be foreseeable. Therefore, in such a case the Town would implement **Mitigation Measure CUL-1** to reduce any potential impacts related to historic resources to a less than significant level.

Mitigation Measure CUL-1: In order to reduce impacts on historic resources, future new developments shall implement the following measure:

In the event a future specific project is proposed that may have the potential to cause a significant adverse change in the significance of a historic resource, the Town shall require an evaluation of the resource by a qualified professional. The evaluation shall be conducted according to the Secretary of the Interior’s Standards for evaluation of historic resources. Project specific mitigation measures shall be included and implemented in accordance with the Secretary’s Standards.

b & c) **Less than Significant with Mitigation** – There are no known archaeological or paleontological resources within the Town. The Open Space and Conservation Element contains policies to require construction projects to stop if archaeological or paleontological resources are uncovered during grading or other on-site excavation activities. Once the resources are assessed for importance, appropriate mitigation compliant with State law will be determined. However, as with any project that requires earthmoving or grading activities, there is the possibility that buried archaeological deposits or paleontological resources could be present and accidental discovery could occur. The Project would

implement **Mitigation Measure CUL-2** to reduce any potential impacts related to archaeological and/or paleontological resources to a less than significant level.

Mitigation Measure CUL-2: In order to reduce impacts on archaeological resources, future new developments shall implement the following measure :

In the event that subsurface archaeological and/or paleontological resources are encountered during the course of grading and/or excavation, all development shall temporarily cease within 25 feet of the find until the Town’s Planning Department is contacted and a qualified archaeologist or paleontologist assesses the resources and makes recommendations for their disposition. Construction activities could continue in areas more than 25 feet away. If any findings are determined to be significant by the archeologist, they shall be subject to scientific analysis; duration/disposition of archaeological specimens as agreed to by the Native American community, land owner, and the Town. This report would be filed with the Northwest Information Center.

d) **Less than Significant with Mitigation** – All known human remains in the project vicinity were buried within the confines of a private cemetery on the grounds of Sacred Heart Schools. No other cemetery is known to exist within the Town. Since the proposed Project does not involve changes to this cemetery, there would be no impacts on human remains. However, as with any project that may involve earthmoving or grading activities, there is the possibility that buried human remains could be present and accidental discovery could occur. In the event that human remains are uncovered, the proposed Project would implement **Mitigation Measure CUL-3**. Therefore, the proposed Project would have a less than significant impact related to disturbance of human remains.

Mitigation Measure CUL-3: In order to reduce impacts on human remains, future new developments shall implement the following measure:

If human remains are encountered, excavation or disturbance of the location shall be halted in the vicinity of the remains, and the county coroner contacted. If the coroner determines the remains are Native American, the coroner shall contact the Native American Heritage Commission. The Native American Heritage Commission shall identify the person or persons believed to be most likely descended from the deceased Native American. The most likely descendent shall make recommendations regarding the treatment of the remains with appropriate dignity.

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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VI. GEOLOGY AND SOILS: Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Geology and Soils Description

a) i) **Less than Significant Impact** - The Alquist-Priolo Earthquake Fault Zoning Act (California Public Resources Code Sections 2621 et seq.) was passed to prevent construction of buildings used for human occupancy on the surface of active faults, in order to minimize the hazard of surface rupture of a fault to people and buildings. Before cities and counties can permit development within Alquist-Priolo Earthquake Fault Zones, geologic investigations are required to show that the sites are not threatened by surface rupture from future earthquakes. There are no Alquist-Priolo Earthquake Fault Zones in the Town of Atherton. The closest such zone is located in the Town of Woodside to the west of I-280. Other known faults within the Town boundaries may be susceptible to surface rupture. Surface rupture of an active fault could occur in the lifetimes of buildings developed pursuant to the General Plan Update.

Future development pursuant to the proposed General Plan Update would be consistent with the City's Safety Element, which contains goals and policies to protect residents from geologic and seismic hazards. Any future development projects pursuant to the proposed General Plan Update would be required to comply with all applicable Building Department requirements. Further, the Town's Building Code requires future development to submit an engineering geology report and soils engineering report to identify and mitigate geology conditions and hazards. Compliance with the CBC and Town Building Code would ensure impacts would be less than significant.

a) ii) **Less than Significant Impact** - There are several known active faults in the region, including the San Andreas Fault west of I-280, and the Hayward and Calaveras Faults located in the East Bay. Any major earthquake along these systems will cause seismic ground shaking in Atherton. Much of the Town is located on soil that is more porous and loosely compacted than bedrock, and thus subject to greater impacts from seismic ground shaking than bedrock.

Development under the existing and proposed General Plan Update would expose new structures and residents in Atherton to seismic ground shaking. Thus, this impact is not necessarily a result of the Update Project. Future development would be designed and built in compliance with the California Building Code (CBC). The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with specified probability of occurring at the site or in the area. Compliance with the CBC and the Atherton Municipal Code would ensure impacts would be less than significant.

a) iii) **Less than Significant Impact** - There are mapped zones where there is potential for liquefaction (California Geological Survey) along the Atherton Channel, along Eleanor Drive in the vicinity of Stockbridge Avenue, and in the vicinity of Tallwood Drive southeast of Walsh Road. There may be other areas with potential for liquefaction known locally. Each project developed pursuant to the proposed General Plan Update would be required to have a site-specific geotechnical investigation conducted. The geotechnical investigations for each respective project would evaluate liquefaction potential at the affected project sites and provide any needed recommendations for minimizing hazards from liquefaction and from other seismic ground failure. In addition, development must also comply with seismic safety regulations in the CBC and Atherton Municipal Code. Compliance with the CBC and Atherton Municipal Code would ensure impacts would be less than significant.

a) iv) **Less than Significant Impact** - Zones of required investigation for earthquake-induced landslides occur (California Geological Survey) northwest and south of Bear Gulch Reservoir. There may be other areas with potential for earthquake-induced landslides known locally. Each project developed pursuant to the proposed General Plan Update would be required to have a site-specific geotechnical investigation conducted. The geotechnical investigation for each such project on a site within a zone of required investigation for earthquake-induced landslides would be required to evaluate the potential for such landslides onsite provide any needed recommendations for minimizing hazards. Each project must also comply with seismic safety regulations and requirements regarding slope stability in the CBC and Atherton Municipal Code. Compliance with the CBC and Atherton Municipal Code would ensure impacts would be less than significant.

b) **Less than Significant Impact** - The natural water erosion potential of soils in Atherton is low, unless these soils are disturbed during the wet season. Erosion can be dramatically accelerated by soil disturbance and soil exposure by construction activities if effective soil erosion measures are not used.

Water erosion during construction of projects developed in accordance with the proposed General Plan Update would be minimized by limiting construction to dry weather, covering exposed excavated dirt during periods of rain, and protecting excavated areas from flooding with temporary berms. Soil erosion after construction would be controlled by implementation of approved landscape and irrigation plans. The Town of Atherton requires that these plans be submitted as part of the Building Permit review and approval process for each project. Compliance with this requirement would ensure impacts are less than significant.

Future construction may temporarily expose the soil to wind and/or water erosion. Erosion caused by strong wind, excavation and earth moving operations would be minimized by watering during construction and by covering earth to be transported in trucks to or from the site; these requirements are part of the Town of Atherton Grading and Drainage review process. Therefore, the project will not result in significant impacts related to a loss of topsoil or erosion.

Any project which involves disturbing more than ¼ acre of land, more than 50 cubic yards of cut or fill grading, creating or replacing 2,500 square feet of impervious surface, and/or several other similar criteria, shall have an erosion and sediment transport control plan as part of the applicant's grading plan, as a standard condition of approval by the Town of Atherton. The grading plan must be approved by the Building Department and the Public Works Department prior to the issuance of any building permits. Therefore, impacts are less than significant.

c) **Less than Significant Impact** - There are known areas in Atherton with unstable soils that could result in on- or offsite landslides, lateral spreading, liquefaction, or collapse. Development under the proposed General Plan Update may occur on soil that is unstable due to these factors and may result in significant impacts. Development proposing structures for human occupancy would be required to have a geotechnical investigation conducted per the CBC and the Atherton Municipal Code. The geotechnical investigation would include site-specific assessment of hazards from subsidence and collapsible soils.

Each project would be required to comply with recommendations in the geotechnical investigation report for that project ensuring that impacts are less than significant.

The major cause of ground subsidence is withdrawal of groundwater. The issue of groundwater withdrawal is addressed in the Draft Open Space and Conservation Element under the topic Santa Clara and San Mateo Plain Groundwater Sub-basins. Atherton, along with several other surrounding jurisdictions have committed to the sustainable management of local groundwater to protect its quality and ensure its availability during droughts and emergency situations. A system of future repetitive measurements of land-surface elevation is in place to determine if any subsidence occurs. Therefore, it is unlikely that ground subsidence would become a substantial hazard as a result of the General Plan Update.

d) **Less than Significant Impact** - Most of the Town of Atherton is underlain by alluvial soils composed primarily of granular soils (silty sand, sand, and gravel). Such soils typically have low to moderately low expansion potentials. West of Alameda de las Pulgas is underlain by bedrock of the Franciscan Formation with generally thin soil covering. Such soils also typically have low to moderately low expansion potentials. Projects built in accordance with the General Plan Update would be required to comply with applicable Building and Safety regulations and the CBC. The geotechnical investigation would be prepared and include site-specific assessment of hazards from potentially expansive soils. Each project would be required to comply with recommendations in the geotechnical investigation report for that project. There would be no significant risks to life or property due to expansive soils.

e) **No Impact** - Existing sewers serve the entire Town of Atherton. Projects developed in accordance with the General Plan Update would include sewer laterals and would not rely on septic tanks or other alternative wastewater disposal systems. No impact would occur.

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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VII. GREENHOUSE GAS EMISSIONS: Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Greenhouse Gas Emissions Description

a) – b) **Less-than-Significant Impact** – The project consists of an update to the existing General Plan. No changes are proposed to the land uses, their pattern, intensity or extent. The only changes proposed to the circulation system involve redesignation of certain street classifications to achieve consistency with designations in adjacent jurisdictions or to reflect actual use. The Town is currently “built-out” in accordance with the 2002 General Plan and most development activities consist of demolishing older homes and replacing them with newer, larger homes. The Atherton 2016 adopted Climate Action Plan (CAP) includes projections of “Business-as-usual” and “Target” emissions for years 2020 and 2030 from 2005 base year emissions. The CAP projects “Business-as-usual” emissions would increase by 3,652 (243.5/year) metric tons of CO₂e and 9,535 (381.4/year) metric tons of CO₂e for the years 2020 and 2030 respectively. The CAP projects “Target” emissions would decrease by 10,910 (727.3/year) metric tons of CO₂e and 35,639 (1,425.6/year) metric tons of CO₂e for the years 2020 and 2030 respectively.

The Bay Area Air Quality Management District (BAAQMD) provides two alternative quantitative thresholds, a brightline threshold of 1,100 metric tons of CO₂e per year to assess smaller projects or an efficiency-based threshold of 4.6 metric tons CO₂e per Service Population (SP) per year for larger projects. BAAQMD defines the SP as the number of residents and employees generated by the project. In this case, the project would not substantially change the number of residents or substantially increase the number of employees. Therefore, the project is small enough that the brightline threshold is the larger of the two and the project should be assessed against the brightline threshold of 1,100 metric tons of CO₂e per year for this analysis.

As stated above, the CAP projects “Business-as-usual” emissions would increase by 243.5 metric tons of CO₂e per year and 381.4 metric tons of CO₂e per year between 2005 and the years 2020 and 2030 respectively. Further, assuming at least partial implementation of the Atherton CAP, the annual CO₂e emissions would decrease, not increase. Therefore, with partial or full implementation of the CAP the project would have no impact on Greenhouse Gas emissions. Even in the worst case with “Business-as-usual” emissions, the projected annual increase would be substantially less than the brightline threshold of 1,100 metric tons of CO₂e per year; this would be a less-than-significant impact.

The Town has adopted a qualified GHG Reduction Strategy in the form of the 2016 Atherton Climate Action Plan. The General Plan Update recognizes and supports the CAP. The CAP is cited in the Land Use, Circulation and Community Safety Elements and those elements contain policies supporting its implementation. Therefore, the Project does not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The Project is consistent with the CAP and this would be a less-than-significant impact.

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS: Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Hazards and Hazardous Materials Description

a) **Less-than-Significant Impact** - Hazardous materials include substances that are flammable, corrosive, explosive, radioactive, infectious, thermally unstable, and poisonous. Although such substances are typically associated with industrial land uses and processes, which do not exist in Atherton, they may be found at construction sites and public buildings (e.g. corporation yards). Hazardous materials are also used in most households, and may include cleaning solvents, paint, motor oil, pesticides, plastics, and various common household chemicals.

Hazardous material issues are commonly associated with storage, handling, transportation, and disposal. There may also be issues associated with hazardous building materials such as asbestos, lead and mercury. Naturally occurring hazards such as mold may also be an issue in some structures. More recently, the disposal of electronic waste such as computers, televisions, and fluorescent lamps has become a concern.

Adoption of the General Plan Update would have a less than significant impact on the transport, use, or disposal of hazardous materials. The Project does not anticipate new land uses that would generate hazardous materials, or require the storage or transport of hazardous materials. State laws regulate the transport, use and disposal of hazardous material associated with construction and at public buildings. As a primarily residential community, continued use of household hazardous materials such as paint, batteries, motor oil, cleaning solvents, and fluorescent light bulbs can be expected. However, they would be in quantities that would have a less than significant impact.

b) **Less-than-Significant Impact** - There would be a less than significant impact on the risk of hazardous materials accidents resulting from implementation of the General Plan Update. The Project proposes no increase in the level of hazardous materials handled, stored, transported, or disposed in Atherton, nor does it propose changes to the transportation system which would increase the risk of upset.

c) **Less-than-Significant Impact** - The General Plan Update proposes no change to hazardous material handling within the vicinity of Atherton's school campuses. In the event building materials such as asbestos, lead, or mercury are determined to be present in schools as these facilities are updated and retrofitted, appropriate remediation measures would be followed.

d) **No Impact** – There are no sites in Atherton included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the land uses designated in the General Plan Update project could not be located on or near such a site. No impact would occur.

e) **No Impact** - The nearest public use airports are San Carlos Airport in the City of San Carlos, 4 miles to the northwest, and Palo Alto Airport in the City of Palo Alto, 4 miles to the southeast of the Town boundary. No portion of the Town is within an airport land use plan or within two miles of an airport.

General Plan Update implementation would not cause any hazards related to aircraft operating to or from either airport.

f) **No Impact** – There are no private airstrips or helicopter landing sites within the Town of Atherton. General Plan Update implementation would not cause any hazards related to aircraft operating to or from either private airstrips or helicopter landing sites.

g) **No Impact** - The Town of Atherton maintains a citywide emergency operations plan, which goes into effect at the onset of a major disaster such as a major earthquake. The Police Department and the Menlo Park Fire Protection District maintains the disaster plan. In case of a disaster, the Police Department and Fire Protection District are responsible for implementing the plan. Emergency evacuation routes are designated in the proposed, updated Community Safety Element. The Police Department may designate evacuation routes based on the specific circumstance of the emergency.

The City has preplanned evacuation routes for dam inundation areas associated with Bear Gulch Reservoir. The proposed General Plan Update would not change any land use designations in Town.

Emergency preparedness and evacuation routes would not be altered or affected by development under the proposed General Plan Update. Therefore, General Plan Update would not affect implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

h) **Less-than-Significant Impact** – The Community Safety Element Update includes a discussion of Urban and Wildland Fires. The entire Town of Atherton has been identified as a “Community At Risk” by CAL FIRE. Policies included in the Community Safety Element Update address proposals to incorporate required and appropriate fire mitigation measures in new construction, development of legislative and regulatory framework at both the state and local levels to manage the wildland-urban-interface, and provision of minimum road widths and clearances around structures.

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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IX. HYDROLOGY AND WATER QUALITY: Would the project:

a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| e) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Inundation by seiche, tsunami, or mudflow | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Hydrology and Water Quality Description

a) **Less-than-Significant Impact** – Section 303 of the federal Clean Water Act requires states to develop water quality standards to protect the beneficial uses of receiving waters. In accordance with California’s Porter/Cologne Act, the Regional Water Quality Control Boards (RWQCBs) of the State Water Resources Control Board (SWRCB) are required to develop water quality objectives that ensure their region meets the requirements of Section 303 of the Clean Water Act.

Atherton participates in the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), a partnership of the City/County Association of Governments (C/CAG), each incorporated city and town in the county, and the County of San Mateo, which share a common National Pollutant Discharge Elimination System (NPDES) permit. The Federal Clean Water Act and the California Porter-Cologne Water Quality Control Act require that large urban areas discharging stormwater into the San Francisco Bay or the Pacific Ocean have an NPDES permit to prevent harmful pollutants from being dumped or washed by stormwater runoff, into the stormwater system, then discharged into local waterbodies.

The Municipal Regional Permit outlines the State's requirements for municipal agencies in San Mateo County to address the water quality and flow-related impacts of stormwater runoff. Some of these requirements are implemented directly by municipalities while others are addressed by the SMCWPPP on behalf of all the municipalities. This is a comprehensive permit that requires activities related to construction sites, industrial sites, illegal discharges and illicit connections, new development, and municipal operations. The permit also requires a public education program, implementing targeted pollutant reduction strategies, and a monitoring program to help characterize local water quality conditions and to begin evaluating the overall effectiveness of the permit's implementation.

The land uses and population densities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. These same land uses and population densities were in effect when the SMCWPPP was adopted and certified. Policies, programs and projects included in the General Plan Update support and implement the SMCWPPP.

Although wastewater would be generated from the land uses proposed in General Plan Update project, this wastewater would flow to the Silicon Valley Clean Water Treatment Facility, which currently serves the Town and other nearby jurisdictions. The project does not propose any industrial uses, nor would it

create or discharge large quantities of polluted water. Therefore, the proposed Project would result in less-than-significant impacts on water quality standards or waste discharge requirements.

b) **Less-than-Significant Impact** – As discussed in the draft Open Space and Conservation Element, The Town of Atherton is part of the San Francisquito Creek area of the Mid-peninsula that overlies the Santa Clara and San Mateo Plain Groundwater Sub-basins. The Town, along with the cities of Palo Alto, East Palo Alto, Menlo Park, Stanford University, San Mateo County, Santa Clara Valley Water District and several other agencies and non-governmental organizations have committed to:

- Collaborating with other agencies and organizations to better understand the hydrology and geology of the San Francisquito Creek area, and
- The sustainable management of local groundwater to protect its quality and ensure its availability during droughts and emergency situations.

The Town actively monitors the land surface elevation relative to known benchmarks in order to detect any sign of potentially adverse subsidence. Town policies, as described in the General Plan Update, support green infrastructure and groundwater replenishment. Therefore, the Project would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level and would result in less-than-significant impacts to the Sub-basin.

c) **Less-than-Significant with Mitigation** – There are no known proposed projects that would result in the alteration of the course of a stream or substantially alter the existing drainage pattern. However, any project that requires earthmoving or grading activities, includes the possibility of erosion and sedimentation. Therefore, the Town should implement **Mitigation Measure HYD-1** to reduce any potential impacts related to erosion and sedimentation to a less than significant level.

Mitigation Measure HYD-1: In order to reduce impacts related to erosion and sedimentation, future new developments shall implement the following measures:

- Schedule grading and excavation work for dry weather only.
- Stabilize all denuded areas, install and maintain temporary erosion controls (such as erosion control fabric or bonded fiber matrix) until vegetation is established.
- Seed or plant vegetation for erosion control on slopes or where construction is not immediately planned.
- Protect storm drain inlets, gutters, ditches, and drainage courses with appropriate BMPs, such as gravel bags, fiber rolls, berms, etc.
- Prevent sediment from migrating offsite by installing and maintaining sediment controls, such as fiber rolls, silt fences, or sediment basins.
- Keep excavated soil on the site where it will not collect into the street.
- Transfer excavated materials to dump trucks on the site, not in the street.
- Contaminated Soils. If any of the following conditions are observed, test for contamination and contact the Regional Water Quality Control Board:
 - Unusual soil conditions, discoloration, or odor.
 - Abandoned underground tanks.
 - Abandoned wells
 - Buried barrels, debris, or trash.

d) **Less-than-Significant with Mitigation** - The Town of Atherton contains one stream: the Atherton Channel. There are no known proposed projects that would result in the alteration of the course of a stream or substantially alter the existing drainage pattern. However, any project that requires earthmoving or grading activities, includes the possibility of erosion and sedimentation. Implementation

of **Mitigation Measure HYD-1** would reduce any potential impacts related to erosion and sedimentation to a less than significant level.

Atherton participates in the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) as described in section a) above. The land uses and population densities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. These same land uses and population densities were in effect when the SMCWPPP was adopted and certified. Policies, programs and projects included in the General Plan Update, particularly those in the Open Space and Conservation Element, support and implement the SMCWPPP. The proposed Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Therefore, the proposed Project would result in less-than-significant impacts on surface runoff and potential for flooding on- and off-site.

e & f) **Less-than-Significant Impact** – As stated above, the land uses and population densities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. Policies, programs and projects included in the General Plan Update, particularly those in the Open Space and Conservation Element, are designed to prevent the creation or contribution of runoff water which would exceed the capacity of existing or planned stormwater drainage systems, provide substantial additional sources of polluted runoff, and prevent the degradation of water quality. Therefore, the proposed Project would result in less-than-significant impacts to existing or planned stormwater drainage systems, would not result in substantial additional sources of polluted runoff, and would not result in substantial degradation of water quality.

g) **Less-than-Significant with Mitigation** – There are no 100-year flood zones, as designated by the Federal Emergency Management Agency (FEMA), in the Town of Atherton. The dam inundation area for Bear Gulch Reservoir has been modeled and mapped by Cal Water, the dam owner, in January 2019. The inundation area generally follows the alignment of the Atherton Channel west of Alameda de las Pulgas (please see the Community Safety Diagram). Flooding from dam failure is modeled to be most severe in this area. East of Alameda de las Pulgas the modeling forecasts spreading and reduced depths of flooding, covering an area generally between Polhemus Avenue and Park Lane west of Berry Lane. East of Berry Lane the flooding is forecasted to further spread northerly crossing El Camino Real into unincorporated North Fair Oaks.

As stated above, the land uses and population densities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. Policies, programs and projects included in the General Plan Update support reduction and/or elimination of local flooding problems. Inundation from dam failure remains a hazard along Atherton Channel, west of Alameda de las Pulgas, and in the forecasted inundation area between Alameda de las Pulgas and El Camino Real. Therefore, the Town should implement **Mitigation Measure HYD-2** to reduce any potential impacts related to dam failure inundation to a less than significant level.

Mitigation Measure HYD-2: In order to reduce impacts related to dam failure inundation, future new developments shall implement the following measures by the dam owner in compliance with SB 92 (2017):

- Submit Dam Failure Inundation Maps to the CA Department of Water Resources in accordance with the DWR schedule.
- Submit an Emergency Action Plan to the California Office of Emergency Services subsequent to submittal of the Dam Failure Inundation Maps.
- Submit updated plans and maps every 10 years.
- Coordinate the Emergency Action Plans with the affected local governments.

h) **No Impact** - See response (g) above. No portions of the Town of Atherton are within a 100-year floodplain identified by the Federal Emergency Management Agency (FEMA). Therefore, the proposed Project would not place structures within the flow of a 100-year flood, and the Project would have no related impacts.

i) **Less-than-Significant with Mitigation** – See response to g) above. Implementation of Mitigation Measure HYD-2 would reduce any potential impacts related to dam failure inundation to a less than significant level.

j) **Less-than-Significant Impact** - A tsunami is a series of ocean waves usually caused by a sudden displacement of the ocean floor, most often due to earthquakes. Elevations in the Town range from approximately 23 feet on the west side of Bay Road, to approximately 341 feet in the vicinity of Stockbridge Avenue west of Alameda de las Pulgas. These elevations are well above the mapped Tsunami Inundation area.¹ Therefore, the Town is not at risk of flooding due to tsunamis.

A mudflow is a landslide composed of saturated rock debris and soil with a consistency of wet, uncured concrete. There are three small areas (approximately 1 acre in size) in Atherton identified as susceptible to earthquake-induced landslide by the California Geological Survey. Whether these could become mudflows depends on the basic material consistency and the degree of saturation during a seismic event. One of these zones is located on Bear Gulch Reservoir property and is and will remain undeveloped. Bear Gulch Reservoir property is planned and zoned for open space. The other two locations are south of Walsh Road. Any new development proposed on or near these areas would be required to have a geotechnical investigation and recommendations for mitigating the landslide hazard prior to issuing a building permit for the development.

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. Bear Gulch Reservoir is the only area in Atherton that could be impacted by seiche. The Reservoir is surrounded by open space lands which mitigate the potential impacts related to seiche.

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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X. LAND USE AND PLANNING: Would the project:

a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

¹ California Emergency Management Agency, *Tsunami Inundation Map for Emergency Planning, Redwood Point Quadrangle/Palo Alto Quadrangle*, June 15, 2009

Land Use and Planning Description

a) **No Impact** – The land uses and population densities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. The Project would not physically divide an established community; therefore it would have no impact.

b) **No Impact** – As indicated in a) above, the land uses and population densities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. Therefore, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect and would have no impact.

c) **No Impact** – There are no habitat conservation plans or natural community conservation plans in Atherton. Therefore, the Project would have no impact on habitat conservation plans or natural community conservation plans.

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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XI. MINERAL RESOURCES: Would the project:

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

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

Mineral Resources Description

a) **No Impact** – There are no mineral resources in Atherton that are of value to the region or to residents of the state. Therefore, the Project would have no impact on the availability of a known mineral resource.

b) **No Impact** – There are no locally-important mineral resource recovery sites in Atherton, nor are any delineated on the local general plan, specific plan or other land use plan. Therefore, the Project would have no impact on the availability of a locally-important mineral resource recovery site.

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
XII. NOISE: Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Noise Description

a) **Less-than-Significant Impact** – The Town’s noise ordinance (Chapter 8.10 of the Atherton Municipal Code) and the Noise Element of the adopted General Plan contain the Town’s policies and thresholds on noise. Land uses and transportation systems proposed in the General Plan Update are essentially the same as in the existing adopted General Plan. While future construction activities would involve temporary noise, such activities are exempt from the Noise Ordinance, however “loud and raucous noise emanating from any construction or delivery site” is prohibited. Long-term land use operational activities are required to comply with the noise ordinance standards and General Plan policies. Projections of future noise due to traffic volume increases² range from -0.1 to 0.8 dBA. In environmental noise, a change in noise level of 3 dB is considered a just noticeable difference. Therefore, future noise due to traffic volume increases is a less than significant impact. Projections of future noise due to electrification of Caltrain noted a decrease in noise of 0.3 dBA.³ Since this is a relatively small change in overall noise, and is a decrease in noise, it is considered a less than significant impact.

b) **Less-than-Significant Impact** – Land uses and transportation systems proposed in the General Plan Update are the same as in the existing adopted General Plan. There are no changes proposed in the General Plan Update that would increase groundborne vibration or groundborne noise levels. However, some existing uses along the railroad tracks may be subject to noticeable ground vibration, even if it is not changing. Therefore, there would be less-than-significant impact as a result of Project implementation.

² RGD Acoustics, *Assistance with the General Plan Noise Element Update, Report, Town of Atherton*, 29 November 2018

³ Peninsula Corridor Electrification Project FEIR, December 2014

c) & d) **Less-than-Significant Impact** – The RGD Acoustics report cited in a) above indicates future noise due to traffic volume increases and the Caltrain electrification project to be 0.8 dBA or less and a 3 dBA is considered a just noticeable difference. The land uses and development intensity proposed in the General Plan Update are unchanged from the existing adopted General Plan; therefore, the noise associated with the land use and development intensity would remain unchanged. The increase in ambient noise levels in Town as a result of the Project would be less than significant.

e) **Less-than-Significant with Mitigation** – Although the Town is located outside the San Carlos Airport Noise Contours it is within the Airport Influence Area (AIA) as contained in the San Carlos Airport Land Use Plan and Atherton residents have complained of excessive noise from aircraft approaching San Carlos Airport. The General Plan Update would not encourage continuation or increase of such excessive aircraft noise. The Update, on the other hand, contains policies promoting the reduction of excessive aircraft noise. The Project would implement **Mitigation Measure NOISE-1** to reduce potential impacts related to noise to a less than significant level.

Mitigation Measure NOISE-2: In order to reduce noise impacts, future new developments shall implement the following measure shall be implemented:

Recognizing that aircraft and any associated issues thereto are federally regulated, the Town will work with nearby communities and other interested agencies to bring about a reduction of noise levels by private, military, public and commercial airplanes and helicopters.

f) **No Impact** – The Project is not located within the vicinity of a private airstrip; therefore, it would not expose people residing or working in the project area to excessive noise levels. There would be no impact.

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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XIII. POPULATION AND HOUSING: Would the project:

a) Induce substantial 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Population and Housing Description

a) – c) **No Impact** - The land uses and population densities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. The Town is built-out in accordance with the land uses proposed in the General Plan. There is no population growth, housing displacement nor population displacement proposed in the General Plan Update. Therefore, the Project would not induce substantial population growth in an area, either directly or indirectly, it would not displace substantial numbers of existing housing or substantial numbers of people, and it would not necessitate the construction of replacement housing. The Project would have no impact on population and housing.

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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XIV. PUBLIC SERVICES:

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 any of the public services:

i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Public Services Description

a) i. **No Impact** – Fire protection services are provided by the Menlo Park Fire Protection District, a special district that provides fire protection services to the Cities of Menlo Park and East Palo Alto, the Town of Atherton and portions of unincorporated San Mateo County. The Atherton land uses, population densities and intensities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. No additional growth is proposed in Atherton as part of the General Plan Update. Therefore, the proposed Project will not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives of the Fire Protection District.

a) ii. **Less-than-Significant Impact** – Police protection services are provided by the Atherton Police Department, a department of the local government. The Atherton land uses, population densities and intensities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. No additional growth is proposed in Atherton as part of the General Plan Update. The General Plan Update identifies a specific project to reconstruct the Atherton Civic Center, including a new Police Department facility. This facility, although larger than the existing facility, will not accommodate an increase in sworn officers or other personnel. The environmental impacts of constructing the new Civic Center were evaluated in a separate Environmental Impact Report⁴ which included mitigation measures for impacts found to be potentially significant. Those mitigation measures reduced the potential impacts to a less-than-significant level. Therefore, the proposed Project will not result in substantial adverse physical

⁴ PlaceWorks, *Civic Center Master Plan Draft EIR for the Town of Atherton*, State Clearinghouse #2014112003, April 2015

impacts associated with the provision of new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives of the Atherton Police Department.

a) iii. **No Impact** – Public schools in Atherton are provided by the Las Lomas Elementary School District (Las Lomas Elementary School - K-3), the Menlo Park City School District (Encinal Elementary and Laurel Schools - K-5), the Redwood City Elementary School District (Selby Lane School - TK-8), and the Sequoia Union High School District (Menlo-Atherton High School - 9-12). The Atherton land uses, population densities and intensities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. No additional growth is projected in Atherton as part of the General Plan Update. Therefore, the proposed Project will not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives of the several school districts.

a) iv. **No Impact** – Park maintenance and operation services are provided by the Atherton Parks and Recreation Department, a department of the local government. The Atherton land uses, population densities and intensities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. No additional growth is proposed in Atherton as part of the General Plan Update. No new or changed park facilities are called for in the General Plan Update. Therefore, the proposed Project will not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other park and recreation performance objectives.

a) v. **Less-than-Significant Impact** – Town Administrative services, public library and Corporation Yard services are currently located in the Civic Center in the vicinity of Ashfield Road and Dinkelspiel (Station) Lane. Police services are also located in the Civic Center as described in a) ii. above. The Atherton land uses, population densities and intensities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. No additional growth is proposed in Atherton as part of the General Plan Update. The General Plan Update identifies a project to reconstruct the Atherton Civic Center, including new space for administrative services, new public library and corporation yard. This facility, although larger than the existing facility, will not accommodate an increase in personnel. The environmental impacts of constructing the new Civic Center were evaluated in a separate environmental document which included mitigation measures for impacts found to be potentially significant. Those mitigation measures reduced the potential impacts to a less-than-significant level. Therefore, the proposed Project will not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives of the Town of Atherton.

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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XV. RECREATION:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Recreation Description

a) & b) **No Impact** – As described in Section XIV a) iv. above, the Atherton land uses, population densities and intensities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. No additional growth is proposed in Atherton as part of the General Plan Update. No new or changed park facilities are called for in the General Plan Update. The proposed Project would not 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 does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, the Project would have no impact on existing recreational facilities.

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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XVI. TRANSPORTATION/TRAFFIC: Would the project:

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Transportation/Traffic Description

a) – b) **No Impact** – The proposed Project is consistent with the MTC/ABAG Final Plan Bay Area 2040 in that it is consistent with the land uses, circulation components, climate protection goals, housing goals and other goals and performance targets of the regional Plan. The Project is also consistent with the C/CAG Congestion Management Program, including its level of service standards. The Project addresses transportation and circulation topics including the Grand Boulevard Initiative, Complete Streets, Bike/Pedestrian Master Plan, Safe Routes to Schools Program, Green Streets, Neighborhood Traffic Management Program, Transportation Demand Management, rail transportation, bus transportation and scenic roadways. The Circulation Element Update includes level of service standards, derived from the Transportation Research Board, 2000 Highway Capacity Manual, as a commonly accepted measure of effectiveness for the performance of the circulation system. The Update further includes level of service standards of significance under the California Environmental Quality Act. These standards are used to identify thresholds of significant adverse impact on Town intersections during CEQA analysis. The Update modifies a few street classifications, without any impact. Therefore, the proposed project would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system and would have no impact.

c) **No Impact** – The proposed Project includes policies supporting a change in air traffic patterns related to commercial flights approaching and departing the San Carlos Airport. These policies relate to over-flight noise and would not increase traffic levels nor result in a change in location that increases substantial safety risks. No impact would result.

d) **No Impact** – The proposed Project does not include design features and discourages incompatible uses. Therefore, it would not increase hazards due to a design feature or incompatible uses and would have no impact.

e) **No Impact** – The proposed Project includes policies supporting emergency access and designates specific emergency access routes. Therefore, it would not result in inadequate emergency access and would have no impact.

f) **No Impact** – The proposed Project includes policies, plans and programs supporting and enhancing public transit, bicycle, or pedestrian facilities. Therefore, it would not result in conflicts with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities and would have no impact.

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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XVII. 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:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Tribal Cultural Resources Description

a) – b) **No Impact** – As stated in the Open Space and Conservation Element Update, there are no known Native American Tribal Resources in or near Town. Therefore, the Project would have no impact on California Native American tribal cultural resources as defined in the California Public Resources Code.

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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XVIII. UTILITIES AND SERVICE SYSTEMS: Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Utilities and Service Systems Description

a) – b) **No Impact** – As described in the Land Use Element Update, sewage is collected by the West Bay Sanitary District and Fair Oaks Sanitary District for transmission to treatment facilities located in the eastern portion of Redwood Peninsula in Redwood City and operated by Silicon Valley Clean Water (SVCW); a joint powers authority consisting of the cities of Belmont, Redwood City, San Carlos, and the West Bay Sanitary District. The SVCW treatment facilities currently treat wastewater from Atherton and other member jurisdictions in compliance with the standards and requirements of the San Francisco Bay Regional Water Quality Control Board. The Atherton land uses, population densities and intensities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. No additional growth is projected in Atherton as part of the General Plan Update. Therefore, the Project would not exceed the wastewater treatment requirements of the SFBRWQCB and would have no impact. Neither would the Project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

c) **Less-than-Significant with Mitigation** –There are no known proposed projects that would result in the alteration of the course of a stream or substantially alter the existing drainage pattern. However, any project that requires earthmoving or grading activities, includes the possibility of erosion and sedimentation. Therefore, the Town should implement **Mitigation Measure HYD-1** (see Section IX. c) and d)) to reduce any potential impacts related to erosion and sedimentation to a less than significant level.

d) **No Impact** - As described in the Land Use Element Update, the Town's water supply comes from the City and County of San Francisco operated Hetch Hetchy System. The water supply is delivered by the California Water Service Company. The current water supply is adequate to meet the needs and requirements of the Town. The Atherton land uses, population densities and intensities projected in the General Plan Update are unchanged from the adopted 2002 General Plan. No additional growth is projected in Atherton as part of the General Plan Update. Therefore, the Project would have sufficient water supplies available to serve the project from existing entitlements and resources; no new or expanded entitlements are needed and would have no impact.

e) **No Impact** – As described in Section XVIII. a) – b) above, The SVCW treatment facilities currently treat wastewater from Atherton and other member jurisdictions in compliance with the standards and requirements of the San Francisco Bay Regional Water Quality Control Board. The Atherton land uses, population densities and intensities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. No additional growth is projected in Atherton as part of the General Plan Update. Therefore, the Project could result in a determination by the SVCW that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments and would have no impact.

f) – g) **No Impact** – As described in the Land Use Element Update, solid waste and recycling generated by the Town of Atherton is collected and handled by a contractor, which hauls the waste to the Shoreway Environmental Center (a recycling and transfer station) in San Carlos and then to a disposal site at the Corinda Los Trancos “Ox Mountain” landfill north of State Route 92 and Skyline Boulevard. The Ox Mountain facility is licensed to accept mixed municipal solid waste, construction/demolition, agricultural, industrial, and other wastes. The facility has an estimated capacity of 60.5 million cubic yards and is estimated to reach capacity by approximately 2034. The Atherton land uses, population densities and intensities proposed in the General Plan Update are unchanged from the adopted 2002 General Plan. No additional growth is projected in Atherton as part of the General Plan Update. Therefore, facility is served by a landfill with sufficient permitted capacity to accommodate the Project’s solid waste disposal needs and would have no impact. Further, the current solid waste collection and disposal operations comply with federal, state, and local statutes and regulations related to solid waste and the Project would have no impact on those operations.

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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XIX. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Mandatory Findings of Significance Description

The General Plan Update Project includes land uses, population densities and intensities as they are currently existing and are unchanged from the adopted 2002 General Plan. No additional growth is projected in Atherton as part of the General Plan Update.

a) **Less-than-Significant Impact** – The Project has the potential to enhance, not degrade, the quality of the environment. Policies supporting maintenance of the Town’s rural environment, implementation of the Complete Streets program, preservation of open space, protection from excessive noise, protection from flooding and wildland fires, implementation of clean water projects, protection of historic artifacts, and other similar policies and programs are examples of this potential. The Project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the

number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Where potential impacts have been identified, mitigation measures are proposed to reduce the potential impact to a level of less-than-significant.

b) **No Impact** – The General Plan Update project, itself is cumulative in nature. The proposed land uses and circulation pattern are consistent with San Mateo County and Bay Area Regional land use and circulation plans. The Project is comprehensive in that it includes all of the elements required by State law to be encompassed in a general plan (the Housing Element Update was completed earlier; in 2014). Therefore, Project would not have impacts that are individually limited, but cumulatively considerable.

c) **Less-than-Significant Impact** – As analyzed in this Initial Study, the Project will not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. The potential environmental effects on humans analyzed in this Initial Study include air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, transportation and traffic, and utilities and service systems. Where potential impacts have been identified, mitigation measures are proposed to reduce the potential impact to a level of less-than-significant.

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APPENDICES

A. Project Location Map

APPENDIX A: PROJECT LOCATION MAP

