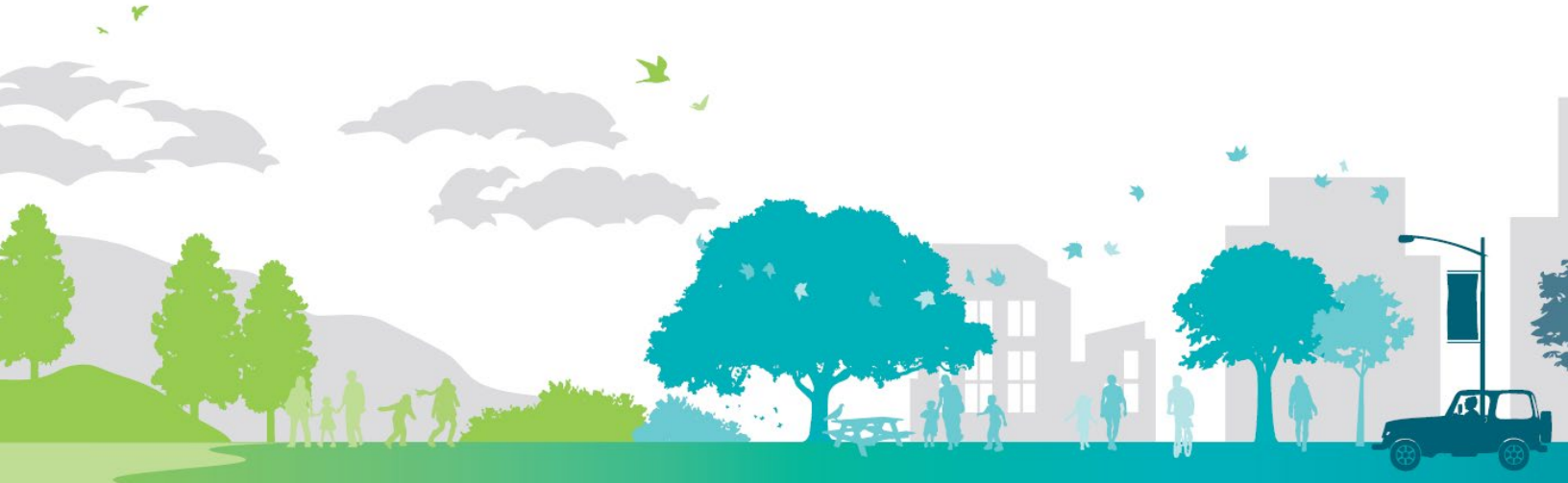
City of Mountain View

MOUNTAIN VIEW PUBLIC SAFETY BUILDING

July 2025 | Draft Environmental Impact Report

State Clearinghouse No. 2024120444



PLACEWORKS

This page is intentionally left blank.

July 2025 | Draft Environmental Impact Report

State Clearinghouse No. 2024120444

MOUNTAIN VIEW PUBLIC SAFETY BUILDING

for the City of Mountain View

City of Mountain View
Public Works Department
Contact: Naveen Govind, Senior Project Manager
500 Castro Street
Mountain View, California 94041
650.903.6527

Prepared by:

PlaceWorks
2040 Bancroft Way, Suite 400
Berkeley, California 94704
510.848.3815
www.placeworks.com

In Association with:

Forget Me Not History
Woodreeve Consulting

This page is intentionally left blank.

TABLE OF CONTENTS

1. Executive Summary 1-1

1.1 Introduction 1-1
1.2 Environmental Procedures 1-1
1.3 Project Location 1-3
1.4 Project Summary 1-3
1.5 Summary of Project Alternatives 1-4
1.6 Issues to Be Resolved 1-4
1.7 Areas of Controversy 1-5
1.8 Summary of Significant Environmental Impacts 1-5

2. Introduction 2-1

2.1 Purpose of the Environmental Impact Report 2-1
2.2 Environmental Review Process 2-2
2.3 Scope of this Draft EIR 2-3
2.4 Incorporation by Reference 2-5
2.5 Mitigation Monitoring 2-5

3. Project Description 3-1

3.1 Introduction 3-1
3.2 Project Site Location and Setting 3-2
3.3 Statement of Objectives 3-5
3.4 Project Characteristics 3-5
3.5 Intended Uses of the EIR 3-12

4. Environmental Analysis 4-1

Organization of Environmental Analysis 4-1
Levels of Significance 4-2
Cumulative Impacts 4-2
4.1 Air Quality 4.1-1
4.2 Biological Resources 4.2-1
4.3 Cultural and Tribal Cultural Resources 4.3-1
4.4 Geology and Soils 4.4-1
4.5 Greenhouse Gas Emissions 4.5-1
4.6 Hazards and Hazardous Materials 4.6-1
4.7 Noise 4.7-1
4.8 Transportation 4.8-1

5. Alternatives to the Proposed Project 5-1

5.1 Introduction 5-1

Table of Contents

5.2 Factors Considered when Developing Alternatives 5-2
5.3 Alternatives Considered and Rejected 5-3
5.4 Alternatives Selected for Analysis 5-4
5.5 Alternative A: No Project Alternative 5-4
5.6 Alternative B: Historic Preservation Alternative 5-8
5.7 Summary of Alternatives Evaluation 5-12
5.8 Environmentally Superior Alternative 5-14

6. Other CEQA Considerations 6-1
6.1 Effects Found Not to Be Significant 6-1
6.2 Significant Unavoidable impacts 6-3
6.3 Significant Irreversible Changes 6-4
6.4 Growth-Inducing Effects 6-5

7. Organizations and Persons Consulted 7-1
Lead Agency—City of Mountain View 7-1
Consultant Team 7-1

List of Figures

Figure 3-1 Regional and Local Vicinity Map 3-3
Figure 3-2 Aerial Photograph 3-4
Figure 3-3 Proposed Site Plan 3-7
Figure 3-4 First Floor Plan 3-8
Figure 3-5 Second Floor Plan 3-9
Figure 3-6 Third Floor Plan 3-10

List of Tables

Table 4.1-1 Criteria Air Pollutant Health Effects Summary 4.1-2
Table 4.1-2 Attainment Status of Criteria Air Pollutants in the San Francisco Bay Area Air Basin 4.1-14
Table 4.1-3 Ambient Air Quality Monitoring Summary 4.1-15
Table 4.1-4 Construction-Related Criteria Air Pollutant Emissions Estimates 4.1-19
Table 4.1-5 Operational Criteria Air Pollutant Emissions Estimates 4.1-21
Table 4.1-6 Construction Health Risk Assessment Results – Unmitigated 4.1-22
Table 4.1-7 Construction Health Risk Assessment Results – Mitigated 4.1-24
Table 4.3-1 Mountain View 2030 General Plan Policies Relevant to Cultural Resources and the Proposed Project 4.3-4
Table 4.5-1 Construction-Related GHG Emissions 4.5-16
Table 4.5-2 Consistency Analysis with the Air District's GHG Best Management Practices 4.5-16

Table 4.5-3 Consistency Analysis with the Municipal Operations Climate Action Plan 4.5-19
Table 4.6-1 Mountain View 2030 General Plan Policies Relevant to Hazardous Materials and the Proposed Project 4.6-5
Table 4.7-1 Typical Noise Levels 4.7-4
Table 4.7-2 Human Reaction to Typical Vibration Levels 4.7-5
Table 4.7-5 Project-Related Construction Noise 4.7-12
Table 4.7-6 Construction Equipment Vibration Levels for Architectural Damage 4.7-16
Table 5-1 Comparison of Project Alternative Impacts 5-12
Table 5-2 Ability to Meet Proposed Project Objectives 5-13

Appendices

Appendix A: Notice of Preparation, Initial Study, and Scoping Comments
Appendix B: Air Quality and Greenhouse Gas Emissions Data
Appendix C: Historic Resources Evaluation
Appendix D: Phase I Environmental Site Assessment
Appendix E: Noise Data

Table of Contents

This page is intentionally left blank.

1. Executive Summary

1.1 INTRODUCTION

This Draft Environmental Impact Report (EIR) addresses the environmental effects associated with the implementation of the proposed Mountain View Public Safety Building (proposed project). The California Environmental Quality Act (CEQA) requires that local government agencies consider the environmental consequences before taking action on projects over which they have discretionary approval authority. An environmental impact report (EIR) analyzes potential environmental consequences in order to inform the public and support informed decisions by local and state governmental agency decision makers. This document focuses on impacts determined to be potentially significant in the Initial Study completed for this project (see Appendix A, *Notice of Preparation, Initial Study, and Scoping Comments*).

This Draft EIR has been prepared pursuant to the requirements of CEQA. The City of Mountain View, as the lead agency, has reviewed and revised all submitted drafts, technical studies, and reports as necessary to reflect its own independent judgment, including reliance on City technical personnel from other departments and review of all technical subconsultant reports.

Data for this Draft EIR derive from on-site field observations, discussions with affected agencies, analysis of adopted plans and policies, review of available studies, reports, data and similar literature, and specialized environmental assessments (air quality, biological resources, cultural resources, geological resources, greenhouse gas emissions, hazards and hazardous materials, noise, transportation, and tribal cultural resources).

1.2 ENVIRONMENTAL PROCEDURES

This Draft EIR has been prepared pursuant to CEQA to assess the environmental effects associated with implementation of the proposed project, as well as anticipated future discretionary actions and approvals. CEQA established six main objectives for an EIR:

1. Disclose to decision makers and the public the significant environmental effects of proposed activities.
2. Identify ways to avoid or reduce environmental damage.
3. Prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.

1. Executive Summary

4. Disclose to the public reasons for agency approval of projects with significant environmental effects.
5. Foster interagency coordination in the review of projects.
6. Enhance public participation in the planning process.

An EIR is the most comprehensive form of environmental documentation in CEQA and the CEQA Guidelines; it is intended to provide an objective, factually supported analysis and full disclosure of the environmental consequences of a proposed project with the potential to result in significant, adverse environmental impacts.

An EIR is one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Before approving a proposed project, the lead agency must consider the information in the EIR; determine whether the EIR was prepared in accordance with CEQA and the CEQA Guidelines; determine that it reflects the independent judgment of the lead agency; adopt findings concerning the project's significant environmental impacts and alternatives; and adopt a statement of overriding considerations if significant impacts cannot be avoided.

1.2.1 Draft EIR Organization

Chapter 1: Executive Summary. Summarizes the background and description of the proposed project, the format of this EIR, project alternatives, any critical issues remaining to be resolved, and the potential environmental impacts and mitigation measures identified for the project.

Chapter 2: Introduction. Describes the purpose of this EIR, background on the project, the notice of preparation, the use of incorporation by reference, and Final EIR certification.

Chapter 3: Project Description. A detailed description of the project, including its objectives, its area and location, approvals anticipated to be required as part of the project, necessary environmental clearances, and the intended uses of this EIR.

Chapter 4: Environmental Analysis. Each environmental topic is analyzed in a separate section that discusses: the applicable regulatory framework; existing conditions; the significance criteria used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the project; the potential adverse and beneficial effects of the project; the level of impact significance with and without mitigation; and the potential cumulative impacts of the proposed project and other existing, approved, and proposed projects in the area.

Chapter 5: Alternatives to the Proposed Project. Describes the alternatives and compares their impacts to the impacts of the proposed project. Alternatives include the No Project Alternative

and the Historic Preservation Alternative. The environmentally superior alternative would be the Historic Preservation Alternative.

Chapter 6: Other CEQA Considerations. Provides a discussion of effects found not to be significant, significant and unavoidable impacts, significant irreversible changes to the environment, and growth-inducing effects.

Chapter 7: Report Preparers. Includes a list of people that prepared or were contacted during the preparation of this Draft EIR.

Appendices: The appendices for this document consist of these supporting documents:

- Appendix A: Notice of Preparation, Initial Study, and Scoping Comments
- Appendix B: Air Quality and Greenhouse Gas Emissions Data
- Appendix C: Historic Resources Evaluation
- Appendix D: Phase I Environmental Site Assessment
- Appendix E: Noise Data

1.2.2 Type and Purpose of This Draft EIR

This Draft EIR has been prepared as a "Project EIR," defined by Section 15161 of the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3). This type of EIR examines the environmental impacts of a specific development project and should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation.

1.3 PROJECT LOCATION

The project site is at 1000 Villa Street in the City of Mountain View in Santa Clara County. To the north of Mountain View is San Francisco Bay, to the east is Sunnyvale, to the south is Cupertino, and to the west is Palo Alto and Los Altos. Mountain View is approximately 40 miles southeast of San Francisco and approximately 14 miles west of San José.

The project site is bound by Central Expressway and the Caltrain Railroad to the north, Franklin Street to the east, Villa Street to the south, and South Shoreline Boulevard to the west. The site is assigned Assessor's Parcel Number 158-15-027. Regional access to the project site is from State Route (SR) 82, SR 85, and US 101.

1.4 PROJECT SUMMARY

The City intends to develop the project site in two phases. The proposed project would replace the existing building and associated parking lot. The proposed project includes a new Public

Safety Building, parking garage, shooting range, surface parking, and K-9 training area. In the eastern corner of the project site, 0.6-acre would remain undeveloped for future potential use by the City. The City of Mountain View is the lead agency for the proposed project.

1.5 SUMMARY OF PROJECT ALTERNATIVES

This Draft EIR analyzes alternatives to the proposed project that are designed to reduce the significant environmental impacts of the proposed project and feasibly attain most of the proposed project objectives. There is no set methodology for comparing the alternatives or determining the environmentally superior alternative under CEQA. Identification of the environmentally superior alternative involves weighing and balancing all of the environmental resource areas by the City. The following alternatives to the proposed project were considered and analyzed in detail:

- **Alternative A: No Project Alternative.** Consistent with Section 15126.6(e)(2) of the CEQA Guidelines, the No Project Alternative presents the No Project scenario. Accordingly, under this alternative, the proposed project would not be approved. No development activities would occur on the project site, which would remain in its existing condition.
- **Alternative B: Historic Preservation Alternative.** Under the Historic Preservation Alternative, the existing, 44,914-square-foot Mountain View Police Services - Fire Administration building would not be demolished and the proposed project would occur within the existing building. This alternative assumes that the existing parking garage would be reconfigured and/or expanded to accommodate the increased parking supply included in the proposed project, but no personnel or facility changes would occur within the existing building.

Chapter 5, *Alternatives*, of this Draft EIR, includes a complete discussion of these alternatives. As discussed in Chapter 5, the Historic Preservation Alternative is the Environmentally Superior Alternative pursuant to CEQA Guidelines Section 15126.6.

1.6 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the proposed project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this Draft EIR adequately describes the environmental impacts of the project.
2. Whether the benefits of the project override those environmental impacts which cannot be feasibly avoided or mitigated to a level of insignificance.

3. Whether there are other mitigation measures that should be applied to the project besides the Mitigation Measures identified in the Draft EIR.

4. Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the proposed project and achieve most of the basic project objectives.

1.7 AREAS OF CONTROVERSY

In accordance with Section 15123(b)(2) of the CEQA Guidelines, the EIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. Prior to preparation of the Draft EIR, the City of Mountain View issued a Notice of Preparation (NOP) on December 10, 2024. The CEQA-mandated scoping period for this EIR was between December 10, 2024 and January 15, 2025, during which interested agencies and the public could submit comments about the potential environmental impacts of the proposed project. During this time, the City received one comment letter, from the Native American Heritage Commission. This comment letter described regulatory information regarding the tribal consultation process and provided recommendations for cultural resources assessments. Appendix A, *Notice of Preparation, Initial Study, and Scoping Comments*, of this Draft EIR contains the NOP as well as the comment letter received by the City in response to the NOP.

1.8 SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS

Table 1-1, *Summary of Significant Environmental Impacts and Mitigation Measures*, presents significant impacts and mitigation measures, including the impact's level of significance with the imposition of mitigation measures. For a complete description of potential impacts, including those where no mitigation measures are required, please refer to the specific discussions in Sections 4.1 through 4.8.

1. Executive Summary

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
4.1 AIR QUALITY			
Impact AIR-1: Without mitigation, construction activities for the proposed project could generate fugitive dust that exceeds State standards.	**S**	**Mitigation Measure AIR-1:** The project contractor shall comply with the Bay Area Air District's basic best management practices for reducing construction-related emissions of uncontrolled fugitive dust (coarse inhalable particulate matter [PM_{10}] and fine inhalable particulate matter [$PM_{2.5}$]): ▪ 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 trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. ▪ All 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 five minutes (as required by the California airborne toxics	**LTS**

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		control measures Title 13, Section 2485, of the California Code of Regulations). 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. ▪ All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. ▪ All trucks and equipment, including their tires, shall be washed off prior to leaving the site. ▪ Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel. ▪ Publicly visible signs shall be posted with the telephone number and name of the person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations. These measures shall be noted on grading plans prepared by the	

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

1. Executive Summary

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		applicant submitted to the City of Mountain View Building Division. The construction contractor shall implement these measures during ground disturbing activities. The City shall verify compliance that these measures have been implemented during normal construction site inspections.	
Impact AIR-2: Construction activities for the proposed project could generate cancer risks above acceptable levels for the maximally exposed residential receptor.	**S**	**Mitigation Measure AIR-2:** The City of Mountain View shall specify in the construction bid that the project construction contractor(s) and subcontractor(s) comply with the following requirements for all off-road equipment used over the entire duration of the construction activities at the site: ▪ Use engines that meet either US EPA or California Air Resources Board (CARB) Tier 4 Final emission standards for engines that are greater than 25 horsepower. Ensure that all construction plans submitted to the City of Mountain View Building Division clearly show the selected emission reduction strategy for construction equipment over 25 horsepower. ▪ If Tier 4 Final equipment is not available for use for the project for a specific piece of off-road construction equipment, documentation shall be provided to the City of Mountain View demonstrating that such equipment is not available for the project. If Tier 4 Final equipment is not available, the construction contractor(s) and subcontractor(s) affected shall use Tier 4 Interim equipment	**LTS**

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		instead. If Tier 4 Interim equipment is not available for use for the project for a specific piece of off-road construction equipment, documentation shall be provided to the City demonstrating that such equipment is not available for the project. If Tier 4 Interim equipment is not available, the construction contractor(s) and subcontractor(s) affected shall use Tier 3 equipment outfitted with a level 3 diesel particulate filter instead. ▪ Prohibit the use of generators except for electric alternatives. The City shall ensure that all construction plans submitted to the City of Mountain View Building Division clearly show the requirement to use power storage equipment or electric generators in lieu of fossil fuel powered generators. ▪ Maintain a list of all operating equipment in use on the project site for verification by the City or their designee. The construction equipment list shall state the makes, models, fuel type, and number of construction equipment on-site. All equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. ▪ Communicate with all sub-contractors in contracts and construction documents that all non-essential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board Rule 2449 and is responsible for ensuring that this requirement is met.	

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

1. Executive Summary

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
4.2 BIOLOGICAL RESOURCES			
Impact BIO-1: Tree removal and demolition activities during site clearance could destroy active nests, and/or otherwise interfere with nesting of birds protected under federal and State law.	**S**	**Mitigation Measure BIO-1:** Nests of raptors and other birds shall be protected when in active use, as required by the federal Migratory Bird Treaty Act and the California Fish and Game Code. The construction contractor shall indicate the following on all construction plans, if construction activities and any required tree removal occur during the breeding season (February 1 and August 31). Preconstruction surveys shall: ▪ Be conducted by a qualified biologist prior to tree removal or grading, demolition, or construction activities. Note that preconstruction surveys are not required for tree removal or construction, grading, or demolition activities outside the nesting period. ▪ Be conducted no more than 14 days prior to the start of tree removal or construction. ▪ Be repeated at 14-day intervals until construction has been initiated in the area after which surveys can be stopped. ▪ Document locations of active nests containing viable eggs or young birds. Protective measures for active nests containing viable eggs or young birds shall be implemented under the direction of the qualified biologist until the nests no longer contain eggs or young birds. Protective measures shall include:	**LTS**

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		▪ Establishment of clearly delineated exclusion zones (i.e., demarcated by identifiable fencing, such as orange construction fencing or equivalent) around each nest location as determined by the qualified biologist, taking into account the species of birds nesting, their tolerance for disturbance and proximity to existing development. In general, exclusion zones shall be a minimum of 300 feet for raptors and 75 feet for passerines and other birds. ▪ Monitoring active nests within an exclusion zone on a weekly basis throughout the nesting season to identify signs of disturbance and confirm nesting status. ▪ An increase in the radius of an exclusion zone by the qualified biologist if project activities are determined to be adversely affecting the nesting birds. Exclusion zones may be reduced by the qualified biologist only in consultation with California Department of Fish and Wildlife. ▪ The protection measures shall remain in effect until the young have left the nest and are foraging independently or the nest is no longer active.	
Impact BIO-2: The proposed development would result in removal of trees protected under City's Municipal Code.	**S**	**Mitigation Measure BIO-2:** The proposed project shall comply with the City of Mountain View's Municipal Code requirements for the provision of the removal of heritage trees in Chapter 32, Trees, Shrubs and Plants, Article II, Protection of The Urban Forest. A tree removal permit shall be obtained for the removal of	**LTS**

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

1. Executive Summary

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		any "heritage" tree, and replacement plantings shall be provided as approved by the City. If permitted, any replacement trees be placed off-site or an appropriate in-lieu tree replacement fee may be paid to the City of Mountain View as compensation for "heritage" trees removed by the proposed project, where sufficient land area is not available on-site for adequate replacement and when approved by the City. In addition, a Tree Protection and Replacement Program (Program) shall be developed by a Certified Arborist prior to project approval and implemented during project construction to provide for adequate protection and replacement of "heritage" trees, as defined by the City's Municipal Code. The Program shall include, but is not limited to, the following provisions: ▪ Adequate measures shall be defined to protect all trees to be preserved. These measures should include the establishment of a tree protection zone (TPZ) around each tree to be preserved, in which no disturbance is permitted. For design purposes, the TPZ shall be located at the dripline of the tree or 10 feet, whichever is greater. If necessary, the TPZ for construction-tolerant species (i.e., coast live oaks) may be reduced to 7 feet. ▪ Temporary construction fencing shall be installed at the perimeter of TPZs prior to demolition, grubbing, or grading.	

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		Fences shall be 6-foot chain link or equivalent, as approved by the City of Mountain View. Fences shall remain until all construction is completed. Fences shall not be relocated or removed without permission from the consulting arborist. ▪ No grading, excavation, or storage of materials shall be permitted within TPZs. Construction trailers, traffic, and storage areas shall remain outside fenced areas at all times. No excess soil, chemicals, debris, equipment, or other materials shall be dumped or stored within the TPZ. ▪ Underground services including utilities, sub-drains, water or sewer shall be routed around the TPZ. Where encroachment cannot be avoided, special construction techniques such as hand digging or tunneling under roots shall be employed where necessary to minimize root injury. Irrigation systems must be designed so that no trenching will occur within the TPZ. ▪ Construction activities associated with structures and underground features to be removed within the TPZ shall use the smallest equipment and operate from outside the TPZ. The consulting arborist shall be on-site during all operations within the TPZ to monitor demolition activity. ▪ All grading, improvement plans, and construction plans shall clearly indicate trees proposed to be removed, altered, or otherwise affected by development construction. The tree	

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

1. Executive Summary

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		information on grading and development plans should indicate the number, size, species, assigned tree number, and location of the dripline of all trees that are to be retained/preserved. All plans shall also include tree preservation guidelines prepared by the consulting arborist. ▪ The demolition contractor shall meet with the consulting arborist before beginning work to discuss work procedures and tree protection. Prior to beginning work, the contractor(s) working in the vicinity of trees to be preserved shall be required to meet with the consulting arborist at the site to review all work procedures, access routes, storage areas, and tree protection measures. ▪ All contractors shall conduct operations in a manner that will prevent damage to trees to be preserved. Any grading, construction, demolition or other work that is expected to encounter tree roots shall be monitored by the consulting arborist. If injury should occur to any tree during construction, it should be evaluated as soon as possible by the consulting arborist so that appropriate treatments can be applied. ▪ Any plan changes affecting trees shall be reviewed by the consulting arborist with regard to tree impacts. These include, but are not limited to, site improvement plans, utility and drainage plans, grading plans, landscape and	

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		irrigation plans, and demolition plans. ▪ Trees to be preserved may require pruning to provide construction clearance. All pruning shall be completed by a State of California Licensed Tree Contractor (C61/D49). All pruning shall be done by Certified Arborist or Certified Tree Worker in accordance with the current Best Management Practices for Pruning published by the International Society of Arboriculture, and adhere to the current editions of the American National Standard for Tree Care Operations (Section Z133.1) and Pruning (Section A300). ▪ Any root pruning required for construction purposes shall receive the prior approval of and be supervised by the consulting arborist. ▪ Any demolition or excavation, such as grading, pad preparation, excavation, and trenching, within the dripline or other work that is expected to encounter tree roots should be approved and monitored by the consulting arborist. Any root pruning required for construction purposes shall receive prior approval of, and by supervised by, the consulting arborist. Roots shall be cut by manually digging a trench and cutting exposed roots with a sharp saw. ▪ Tree(s) to be removed that have branches extending into the canopy of tree(s) to remain must be removed by a qualified arborist and not by construction contractors. The qualified	

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

1. Executive Summary

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		arborist shall remove the tree in a manner that causes no damage to the tree(s) and understory to remain. Tree stumps shall be ground 12 inches below ground surface. ▪ All tree work shall comply with the Migratory Bird Treaty Act as well as California Fish and Game Code Sections 3503 through 3513 to not disturb nesting birds. To the extent feasible, tree pruning, and removal shall be scheduled outside of the breeding season. Breeding bird surveys shall be conducted prior to tree work. Qualified biologists shall be involved in establishing work buffers for active nests. (See Mitigation Measure BIO-1.) ▪ The vertical and horizontal locations of all the trees identified for preservation shall be established and plotted on all plans. These plans shall be forwards to the consulting arborist for review and comment. ▪ Foundations, footings, and pavements on expansive soils near trees shall be designed to withstand differential displacement to protect the soil surrounding the tree roots. ▪ Any liming within 50 feet of any tree shall be prohibited, as lime is toxic to tree roots. Any herbicides placed under paving materials shall be safe for use under trees and labeled for that use. ▪ Brush from pruning and trees removal operations shall be chipped and spread beneath the trees within the TPZ. Mulch	

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		shall be between 2 inches and 4 inches in depth and kept at a minimum of 3 feet from the base of the trees. ▪ All recommendations for tree preservation made by the applicant's consulting arborist shall be followed.	
4.3 CULTURAL AND TRIBAL CULTURAL RESOURCES			
Impact CUL-1: The proposed project would remove the historical resource on the project site that is eligible for listing in the California Register under Criterion 3 as a significant example of the work of master architect Goodwin Steinberg.	**S**	**Mitigation Measure CUL-1.1:** The City shall have Historic American Building Survey Level II documentation completed for the Mountain View Police Services - Fire Administration building and its setting. To ensure public access, the City shall submit copies of the documentation to Mountain View Historical Association's History Center and the California Historical Resources Information System Northwest Information Center. This documentation shall include drawings, photographs, and a historical narrative: ▪ **Drawings:** Existing historic drawings of the historical resource shall be photographed with large-format negatives or photographically reproduced on Mylar. In the absence of existing drawings, full-measured drawings of the building's plan and exterior elevations shall be prepared prior to demolition. ▪ **Photographs:** Photo-documentation of the historical resource shall be prepared to Historic American Building Survey standards for archival photography, prior to demolition. Historic American Building Survey standards	**SU**

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

1. Executive Summary

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		require large-format black-and-white photography, with the original negatives having a minimum size of four inches by five inches. Digital photography, roll film, film packs, and electronic manipulation of images are not acceptable. All film prints, a minimum of four inches by five inches, must be hand-processed according to the manufacturer's specifications and printed on fiber-base, single-weight paper and dried to a full gloss finish. A minimum of 12 photographs shall be taken, detailing the site, building exterior, building interior, and character-defining features. Photographs must be identified and labeled using Historic American Building Survey standards. ▪ **Historical Overview:** A professional meeting the Secretary of the Interior's Professional Qualification Standards in Architectural History or History shall assemble historical background information relevant to the historical resource. The City of Mountain View shall verify compliance with this mitigation measure prior to the initiation of any site or building demolition or construction activities.	
		Mitigation Measure CUL-1.2: The City shall incorporate an exhibit or display of the Mountain View Police Services - Fire Administration building and a description of its historical significance into a publicly accessible portion of the proposed	

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		Public Safety Building. The display shall be developed with the assistance of one or more professionals experienced in creating such historical exhibits or displays.	
Impact CUL-2: Construction activities for the proposed project have the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15064.5.	**S**	**Mitigation Measure CUL-2:** Project supervisors, contractors, and equipment operators shall participate in an Archaeological Resource Awareness Training, conducted by a Secretary of Interior-qualified archaeologist, to become familiar with the type of artifacts and features that could be encountered during project-related ground disturbing activities, as well as the procedures to follow if archaeological resources are unearthed during construction. If indigenous, prehistoric or historic-period cultural materials are unearthed during ground-disturbing activities, all work within 100 feet of the find shall halt until a qualified archaeologist and Native American representative can assess the significance of the find. The City and a qualified archaeologist, defined as one meeting the U.S. Secretary of the Interior's Professional Qualifications Standards for Archaeology, and a Native American representative shall be immediately informed of the discovery. Prehistoric and indigenous materials might include obsidian and chert-flaked stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil ["midden"] containing heat-affected rocks and artifacts; stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered-stone tools, such as hammerstones and pitted stones. Historic-period materials might	**LTS**

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

1. Executive Summary

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. If the find is determined to be potentially significant, the archaeologist, in consultation with the Native American representative, shall develop a treatment plan that could include site avoidance, capping, or data recovery. If avoidance is not feasible, project impacts shall be mitigated in accordance with the recommendations of the archeologist, in coordination with the City, Native American representative, and pursuant to CEQA Guidelines Section 15126.4 (b)(3)(C), which requires implementation of a data recovery plan. Once the recovery plan has been reviewed and approved by the City, implemented, and any appropriate resource recovery completed, project construction activity within the area of the find may resume.	
Impact CUL-3: Construction activities for the proposed project have the potential to result in unanticipated discovery of human remains interred outside of dedicated cemeteries.	**S**	**Mitigation Measure CUL-3:** In the event of the discovery of human remains during demolition, excavation, or construction, there shall be no further excavation or disturbance of the site within a 50-foot radius of the location of such discovery, or any nearby area reasonably suspected to overlie adjacent remains, and the area shall be secured to prevent further disturbance. The City and the Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to their authority, the Coroner shall notify the Native	**LTS**

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		American Heritage Commission within 24 hours, which shall attempt to identify descendants of the deceased Native American. If no satisfactory agreement can be reached as to the disposition of the remains pursuant to this State law, then the landowner, in consultation with a qualified archaeologist, shall formulate an appropriate treatment plan for the find, which might include, but not be limited to, respectful scientific recording and removal, being left in place, removal and reburial on-site, or elsewhere. Associated grave goods are to be treated in the same manner. A final report shall be submitted to the City's Community Development Director prior to release of a Certificate of Occupancy. This report shall contain a description of the mitigation programs and its results, including a description of the monitoring and testing resources analysis methodology and conclusions, and a description of the disposition/curation of the resources. The report shall verify completion of the mitigation program to the satisfaction of the City's Community Development Director.	
Impact CUL-4: Construction activities for the proposed project have the potential to cause a significant impact to an unknown tribal cultural resource as defined in Public Resources Code 21074.	**S**	**Mitigation Measure CUL-4:** Implement Mitigation Measures CUL-2 and CUL-3.	**LTS**

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

1. Executive Summary

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
4.4 GEOLOGY AND SOILS			
Impact GEO-1: The construction activities, increased site occupancy, and development of new structures under the proposed project could exacerbate an existing hazard associated with liquefaction due to seismic events.	**S**	**Mitigation Measure GEO-1:** Prior to the issuance of building permits, the project sponsor shall retain the services of a certified engineering geologist and/or geotechnical engineer to prepare a site-specific geotechnical study based on the most recent draft of the conceptual site plans. The geotechnical study shall address, but is not limited to, the effects of seismically induced liquefaction, and include recommendations to ensure any potential hazards related to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction would not occur. The geotechnical study shall be approved by the City of Mountain View's Building Inspection Department prior to the issuance of building permits.	**LTS**
Impact GEO-2 The construction activities, development, and increased site occupancy involved in the proposed project could exacerbate an existing hazard associated with unstable soils due to seismically induced liquefaction.	**S**	**Mitigation Measure GEO-2:** Implement Mitigation Measure GEO-1.	**LTS**
4.5 GREENHOUSE GAS EMISSIONS			
No significant impacts			

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
4.6 HAZARDS AND HAZARDOUS MATERIALS			
Impact HAZ-1: The proposed project could create a hazard to future site occupants due to the release of hazardous materials originating from off-site land uses.	**S**	**Mitigation Measure HAZ-1:** Prior to issuance of demolition or grading permits, shallow soil samples and groundwater samples shall be taken in the near surface soil and tested for tetrachloroethylene to determine if contaminants from previous operations on the former Fremont Laundry or Evelyn Avenue parking lot sites are present at concentrations above established regulatory construction worker safety and commercial environmental screening levels. The results of the soil sampling and testing must be provided to the City of Mountain View Community Development Department. If contaminated soils or groundwater are found in concentrations above the appropriate regulatory environmental screening levels for the proposed project, the project sponsor shall obtain regulatory oversight from the Santa Clara County Department of Environmental Health, Department of Toxic Substances Control, or Regional Water Quality Control Board to mitigate the contamination found. A Site Management Plan (SMP), Removal Action Plan (RAP), or equivalent document must be prepared by a qualified hazardous materials consultant. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety and the health of future workers and visitors to the project site during operation of the proposed	**LTS**

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

1. Executive Summary

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		project. Evidence of regulatory oversight and a regulatory approved plan shall be provided to the City of Mountain View Community Development Department. In the event that vapor encroachment is discovered, the proposed project shall develop a vapor management plan. The vapor management plan shall be prepared in consultation with applicable regulatory agencies, including the Department of Toxic Substances Control and the Regional Water Quality Control Board, and shall be reviewed and accepted by the City of Mountain View prior to the issuance of demolition and grading permits.	
4.7 NOISE			
Impact NOI-1: The proposed project would generate a substantial temporary increase in ambient noise levels during construction.	**S**	**Mitigation Measure NOI-1:** The project sponsor shall incorporate the following practices into the construction contract specifications to be implemented by the construction contractor during the entire construction phase of the project. The project sponsor and contractors shall prepare a Construction Noise Control Plan that includes the following measures: ▪ Limit construction to the hours of 8:00 a.m. to 6:00 p.m., Monday through Friday, and between 9:00 a.m. to 5:00 p.m. on weekends. ▪ Construct temporary noise barriers, where feasible, to screen receptors to the west, south, and east from the	**LTS**

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		construction area. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps. ▪ At least 21 days prior to the start of construction activities, property owners within a 500-foot radius of the project site shall be notified of the planned construction. The notification shall include a brief description of the project, a description of the construction phases to occur, the construction hours noted above, and the overall construction duration. The notification shall include the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. ▪ At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, they shall investigate, take appropriate corrective action, and report the action to the City. ▪ Prior to the start of construction, the project sponsor shall	

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

1. Executive Summary

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		retain a qualified acoustical consultant to conduct construction noise monitoring during the major phases of project construction at select locations in the surrounding neighborhood. The number and location of monitoring positions, and the construction phases during which monitoring shall occur, shall be determined by City staff in consultation with the acoustical consultant. All sound level meters used during monitoring shall satisfy the American National Standards Institute (ANSI) standard of Type 1 instrumentation. All measurements shall be at least 5 feet above the ground and away from reflective surfaces. The noise monitoring data and results shall be submitted in a memorandum to the City on a weekly basis during the construction phases requiring monitoring, along with comparison to the 80 dBA Leq (8-hr) construction noise limit. If exceedances of the construction noise limit are found, the applicant's construction contractor shall modify construction techniques and equipment to reduce the construction noise below the 80 dBA Leq (8-hr) limit. ▪ Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. The signs shall note that all other equipment shall be turned off if not in use for more than 5 minutes. The construction manager shall be responsible for enforcing these noise	

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		reduction requirements. ▪ Construction trucks and equipment shall utilize the best available noise control techniques including improved mufflers, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible. ▪ The contractor shall use impact tools that are hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools. ▪ Stationary noise sources (e.g., generators and air compressors) shall be located as far from sensitive receptors as possible, and they shall be muffled and enclosed within temporary sheds, insulation barriers, or other measures to reduce noise levels to the extent feasible. ▪ Stockpiling of materials shall be located as far as feasible from nearby noise-sensitive receptors. ▪ During the entire active construction period, the use of noise-producing signals—including horns, whistles, alarms, and bells—shall be for safety warning purposes only. The construction manager shall require the use of smart back-up alarms on equipment. (These devices automatically adjust the alarm level based on the background noise level.)	

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

1. Executive Summary

Table 1-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		Alternately, equipment back-up alarms may be turned off and replaced with human spotters in compliance with all safety requirements and laws.	
4.8 TRANSPORTATION			
No significant impacts			

LTS = Less than Significant; S = Significant; SU = Significant and Unavoidable

2. Introduction

2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The California Environmental Quality Act (CEQA) requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. This Draft Environmental Impact Report (EIR) has been prepared to satisfy CEQA and the CEQA Guidelines. The EIR is the public document designed to provide decision makers and the public with an analysis of the environmental effects of the proposed project, to indicate possible ways to reduce or avoid environmental damage and to identify alternatives to the project. The EIR must also disclose significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects.

The lead agency means "the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment" (CEQA Section 21067). The City of Mountain View (City) has the principal responsibility for approval of the proposed Mountain View Public Safety Building project (proposed project). For this reason, the City is the CEQA lead agency for this project.

The intent of the Draft EIR is to provide sufficient information on the potential environmental impacts of the proposed project to allow the City to make an informed decision regarding approval of the proposed project. Specific discretionary actions to be reviewed by the City are described in Section 3.4, *Intended Uses of the EIR*.

This Draft EIR has been prepared in accordance with requirements of the:

- California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code, Sections 21000 et seq.)
- State Guidelines for the Implementation of the CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations, Sections 15000 et seq.)

The overall purpose of this Draft EIR is to inform the lead agency, responsible agencies, decision makers, and the general public about the environmental effects of the development and operation of the proposed project. This Draft EIR addresses effects that may be significant and adverse; evaluates alternatives to the project; and identifies mitigation measures to reduce or avoid adverse effects.

2. Introduction

2.2 ENVIRONMENTAL REVIEW PROCESS

2.2.1 Notice of Preparation and Initial Study

The City determined that an EIR would be required for this project and issued a notice of preparation (NOP) and initial study on December 10, 2024 (see Appendix A, *Notice of Preparation, Initial Study, and Scoping Comments*, of this Draft EIR). The CEQA-mandated scoping period for this EIR was between December 10, 2024 and January 15, 2025, during which interested agencies and the public could submit comments about the potential environmental impacts of the proposed project. During this time, the City received one comment letter, from the Native American Heritage Commission, dated December 13, 2024.

The NOP process helps determine the scope of the environmental issues to be addressed in the Draft EIR. Based on this process and the initial study for the project, certain environmental categories were identified as having the potential to result in significant impacts. Issues considered potentially significant are addressed in this Draft EIR, but issues identified as less than significant or no impact are not. Refer to the initial study in Appendix A for discussion of how these initial determinations were made.

2.2.2 Draft EIR

This Draft EIR will be available for review by the public and interested parties, agencies, and organizations for a 45-day comment period starting July 1, 2025, and ending August 15, 2025. During the comment period, the public is invited to provide written comments on the Draft EIR via mail or email to the City of Mountain View Public Works Department by 5:00 p.m. on August 15, 2025. Comments should be submitted as follows:

- Written: Naveen Govind, Senior Project Manager
  City of Mountain View
  500 Castro Street
  Mountain View, California, 94041
- Phone: (650) 903-6527
- Email: Naveen.Govind@mountainview.gov with “Public Safety Building EIR” as the subject line.

2.2.3 Final EIR Certification

Upon completion of the public review period for the Draft EIR, the City will review all written comments received and prepare written responses for each. A Final EIR will incorporate the received comments, responses to the comments, and any changes to the Draft EIR that result

from comments. The Final EIR will be presented to the City for potential certification as the environmental document for the project.

2.3 SCOPE OF THIS DRAFT EIR

The scope of the Draft EIR was determined based on the City's initial study and comments received in response to the NOP. Pursuant to Sections 15126.2 and 15126.4 of the CEQA Guidelines, the Draft EIR should identify any potentially significant adverse impacts and recommend mitigation that would reduce or eliminate these impacts to levels of insignificance.

2.3.1 Impacts Considered Less than Significant

During preparation of the initial study, the City determined that 11 environmental impact categories were not significantly affected by the proposed project. These categories are not discussed in detail in this Draft EIR.

- Aesthetics
- Agriculture and Forestry Resources
- Energy
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Wildfire

2.3.2 Potentially Significant Adverse Impacts

Through the initial study process, the City determined that further analysis was needed for some of the significance criteria for five environmental topics (air quality, biological resources, geology and soils, hazards and hazardous conditions, noise, and transportation) and all of the significance criteria for three environmental topics (cultural resources, greenhouse gas emissions, and tribal cultural resources) to determine whether the proposed project would result in potentially significant impacts. These topics and specific significance criteria are evaluated in detail in Chapter 4, *Environmental Analysis*, of this Draft EIR.

- **Air Quality**
  a) 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.
  b) Expose sensitive receptors to substantial pollutant concentrations.
  c) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

2. Introduction

- **Biological Resources**
  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 Wildlife or U.S. Fish and Wildlife Service.
  b) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- **Cultural Resources**
  a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.
  b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
  c) Disturb any human remains, including those interred outside of dedicated cemeteries.
- **Geology and Soils**
  a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.
  b) 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.
- **Greenhouse Gas Emissions**
  a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
  b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
- **Hazards and Hazardous Materials**
  a) 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.
- **Noise**
  a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
  b) Generate excessive groundborne vibration or groundborne noise levels.
- **Transportation**
  a) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).
- **Tribal Cultural Resources**
  a) 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:

- i) 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
- ii) 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.

2.4 INCORPORATION BY REFERENCE

Some documents are incorporated by reference into this Draft EIR, consistent with Section 15150 of the CEQA Guidelines, and they are available for review at the City of Mountain View website.

- *Mountain View 2030 General Plan,* City of Mountain View Community Development Department, July 2012.
- *City Of Mountain View Draft 2030 General Plan and Greenhouse Gas Reduction Program Final Environmental Impact Report,* LSA Associates, September 2012.

2.5 MITIGATION MONITORING

Public Resources Code Section 21081.6 requires that agencies adopt a monitoring or reporting program for any project for which it has made findings pursuant to Public Resources Code Section 21081 or adopted a Negative Declaration pursuant to Section 21080(c). Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR or Negative Declaration.

The Mitigation Monitoring Program for the proposed project will be completed as part of the Final EIR, prior to consideration of the project by the City of Mountain View.

2. Introduction

This page is intentionally left blank.

3. Project Description

3.1 INTRODUCTION

This chapter of the Draft Environmental Impact Report (EIR) describes the proposed Mountain View Public Safety Building Project (proposed project) to the public, reviewing agencies, and decision makers. Pursuant to the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (State CEQA Guidelines Section 15124), an environmental impact report (EIR) should contain a description of the proposed project that includes:

- The precise location and boundaries of the proposed project;
- A statement of the objectives sought by the proposed project, including the underlying purpose of the project;
- A general description of the project's technical, economic, and environmental characteristics; and
- A statement briefly describing the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making, a list of permits and other approvals required to implement the project, and a list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies.

An adequate project description should not supply extensive detail beyond that needed for evaluation and review of environmental impacts. Accordingly, this chapter describes the necessary details of the proposed project that are critical in assessing the direct, indirect, long-term, and temporary impacts associated with project implementation. This project description identifies key elements of the proposed project including information about the location, setting, and characteristics of the project site; the principal project features; project objectives; and required permits and approvals. The City of Mountain View (City) is the lead agency for the proposed project.

3.2 PROJECT SITE LOCATION AND SETTING

3.2.1 Regional and Local Location

The project site is at 1000 Villa Street in the city of Mountain View in Santa Clara County. To the north of Mountain View is San Francisco Bay, to the east is Sunnyvale, to the south is the city of Cupertino, and to the west are the cities of Palo Alto and Los Altos (see Figure 3-1, *Regional and Local Vicinity Map*). Mountain View is approximately 40 miles southeast of the city and county of San Francisco and approximately 14 miles west of the city of San José.

As shown on Figure 3-1, the 4.3-acre project site is bounded by West Evelyn Avenue to the north, Franklin Street and Oak Street to the south, and South Shoreline Boulevard to the west. The site is assigned Assessor's Parcel Number 158-15-027. Regional access to the project site is from United States (US) Highway 101, State Route 82 (SR-82), and SR-85.

3.2.2 Existing Site and Surrounding Conditions

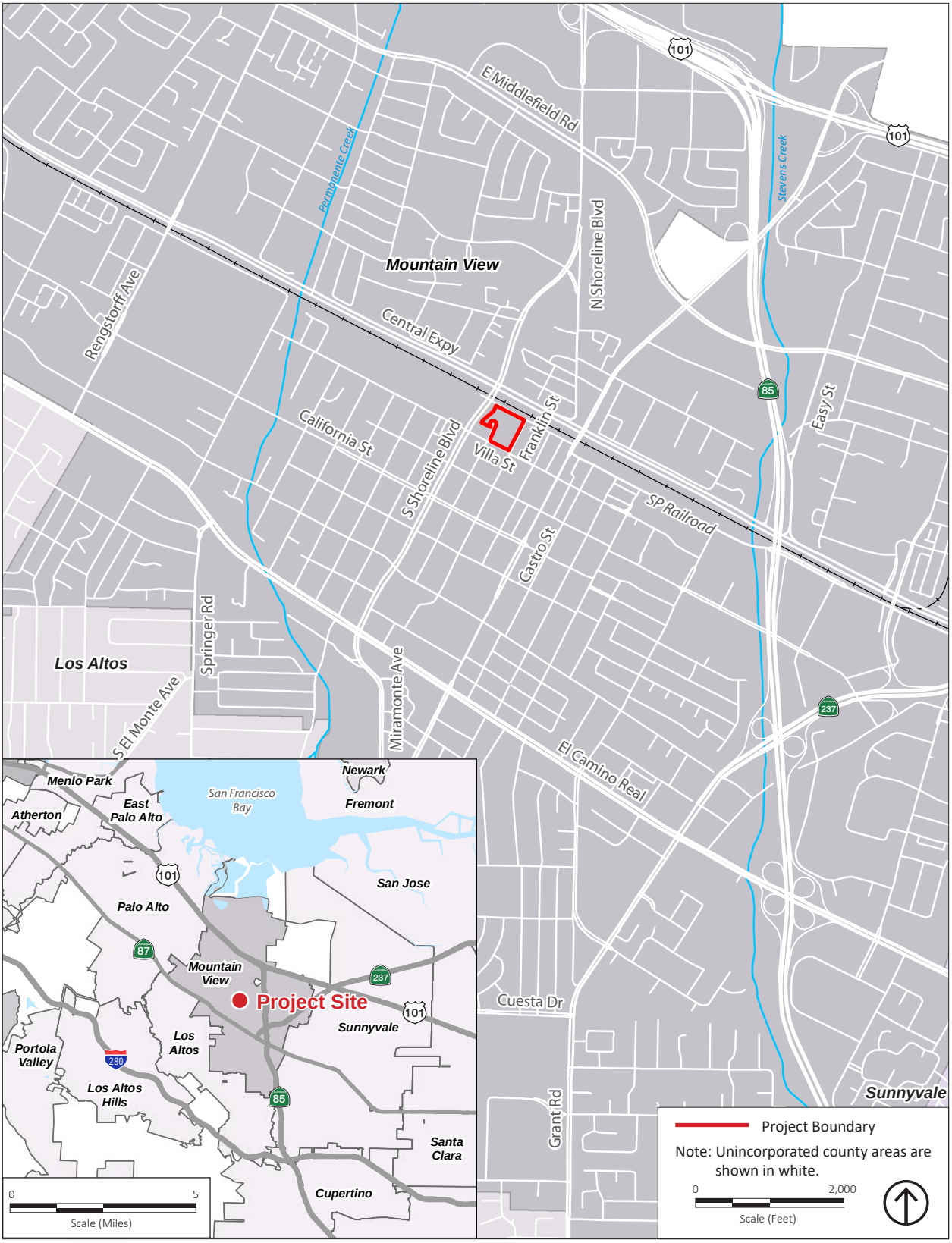
The project site is the location of the existing Mountain View Police Department. As shown on Figure 3-2, *Aerial Photograph*, the project site is currently occupied by the Mountain View Police Services - Fire Administration building; a 42-stall public parking lot; a 110-stall, restricted-access parking lot; a pump station; and a K-9 training area.

As shown on Figure 3-2, the project site is mainly surrounded by single- and multi-family residential, commercial, and institutional land uses. The project site is surrounded by one and two-story residential buildings to the north across the Caltrain railroad tracks and then Central Expressway; two four-story apartment buildings and two-story offices to the east; one- and two-story residential buildings to the south; and one- and two-story residential buildings directly west, with the Kahn Lab School located west across South Shoreline Boulevard. The Khan Lab School is approximately 0.15 miles west of the project site. The Mountain View Fire Department Station No. 1 is 0.1 miles southwest of the project site along Oak Street.

3.2.3 General Plan Land Use and Zoning

The project site has a General Plan land use designation of Parks, Schools and City Facilities with a corresponding zoning designation of Public Facility (PF). According to the Mountain View General Plan land use designation map, low density residential neighborhoods are to the north, downtown mixed use is to the east, low density residential neighborhoods are to the south, and medium-density residential and office uses are to the west.[1]

[1] Mountain View General Plan Land Use Designation, 2020, https://mountainview.prod.govaccess.org/home/showdocument?id=2268.



Source: Generated using ArcMap 2023.

Figure 3-1
Regional and Local Vicinity Map



Source: Generated using ArcMap 2025.

Figure 3-2
Aerial Photograph

3.3 STATEMENT OF OBJECTIVES

The objectives for the proposed project include:

- **General Plan Consistency.** Provide for the development of the site consistent with City's General Plan.
- **Enhance Public Safety Infrastructure.** Construct a modern, state-of-the-art Public Safety Building that meets the operational needs of the Mountain View Police Department (MVPD) and other public safety personnel.
- **Improve Operational Efficiency.** Provide upgraded facilities, including offices, an auditorium, sleep quarters, lockers, and fitness areas, to enhance the functionality and efficiency of police and fire department operations.
- **Increase Parking Capacity.** Develop a three-story parking garage and reconfigure surface parking to accommodate approximately 244 parking spaces, improving access for personnel and visitors.
- **Enhance Site Access and Circulation.** Improve vehicular and pedestrian access with designated secured and public entry points from Oak Street and Franklin Street while maintaining connectivity to major transportation routes.
- **Preserve Flexibility for Future City Uses.** Reserve 0.6 acres of the project site for potential future municipal development to accommodate evolving community needs.
- **Site Reuse.** Utilize the site that currently houses the Mountain View Police Services - Fire Administration building at 1000 Villa Street due to its central location and parcel size that allows for the size and mix of facilities envisioned for the proposed project.

3.4 PROJECT CHARACTERISTICS

"Project," as defined by the CEQA Guidelines, means:

> ... the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1)…enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700. (14 California Code of Regulations Section 15378[a])

3. Project Description

The proposed project would remove the existing Mountain View Police Services - Fire Administration building and associated parking lot and K-9 training area, and construct a new Public Safety Building, parking garage, indoor shooting range, surface parking, and K-9 training area at the same location. In the eastern corner of the project site, 0.6-acre would remain undeveloped for future potential use by the City. See Figure 3-3, *Proposed Site Plan*.

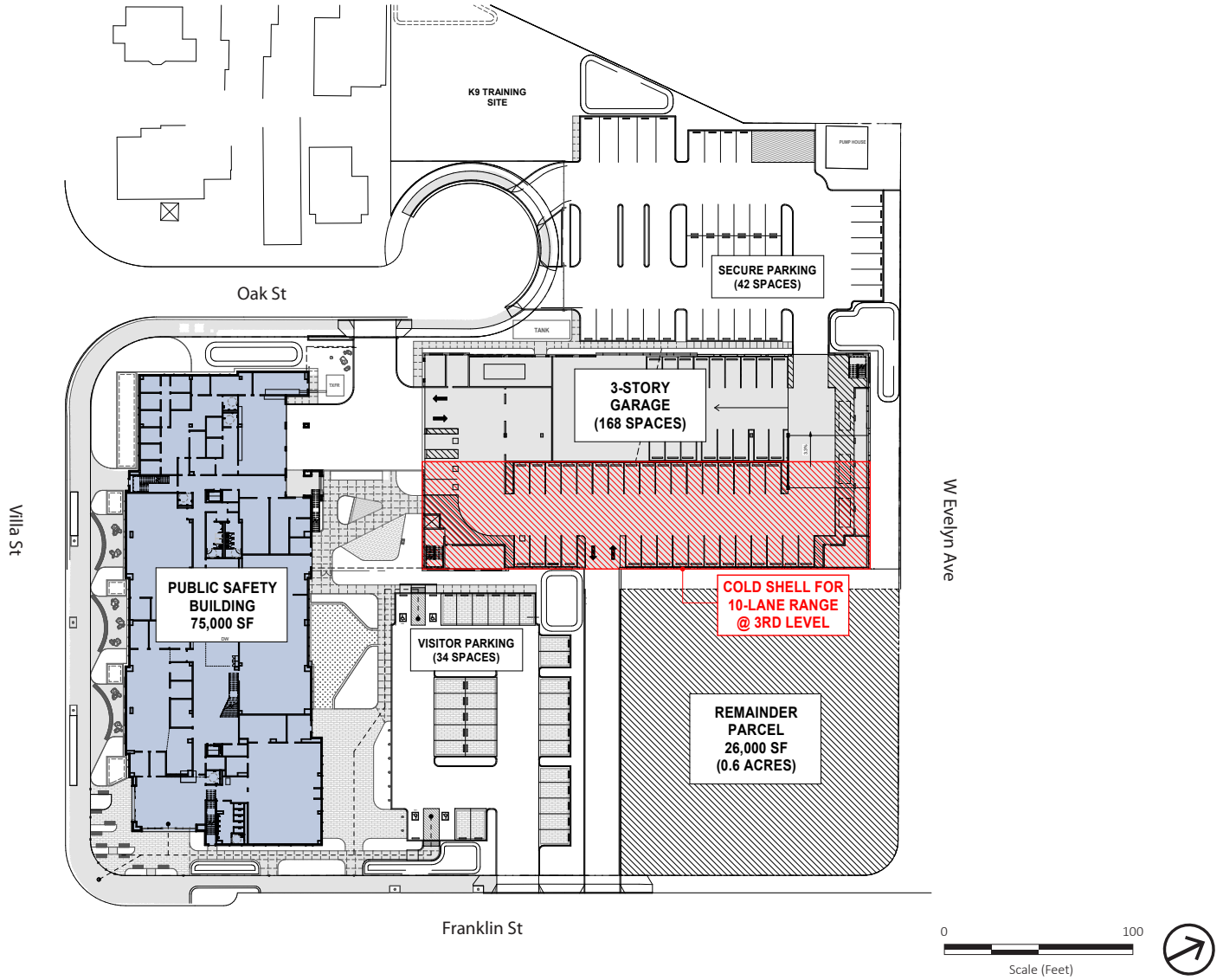
3.4.1 Public Safety Building

Table 3-1, *Existing and Proposed Project Site Conditions*, compares the existing conditions to those of the proposed project. As shown in Table 3-1, the current building, which serves as the headquarters for the police and fire departments, is 44,914 square feet, and the proposed Public Safety Building would be approximately 75,000 square feet, three stories high and a floor area ratio of 0.49. The proposed Public Safety Building would have a variety of offices and associated service rooms for police and fire activities. Some of the designated areas include an auditorium, offices, sleeping quarters, lockers, and a fitness room (see Figure 3-4, *First Floor Plan*; Figure 3-5, *Second Floor Plan*; and 3-6, *Third Floor Plan*). All new facilities would meet current State building standards and would be Leadership in Energy and Environmental Design (LEED) Gold certified, as required in the Mountain View Municipal Code Section 8.20.12. Once built, the proposed Public Safety Building would have an immediate personnel increase of thirteen (13) environmental health staff who would be relocated to the proposed project, for an on-site employee population of 182 employees compared to the existing on-site employee population of 169 employees. At maximum capacity, the proposed Public Safety Building could accommodate up to 242 personnel; however, this number is not the staffing level that is proposed as part of the project.

Table 3-1 Existing and Proposed Project Site Conditions

	Existing Conditions	Proposed Project
Site Area	4.3 acres	4.3 acres
Building Size	44,914 square feet	75,000 square feet
Building Height	1 to 2 stories, with 45-foot clock tower	3 stories
Surface Parking Spaces	42 spaces	76 spaces
Garage Parking Spaces	110 spaces	168 spaces
Total Parking Spaces	152 spaces	244 spaces
Employment	169 employees	182 employees

Source: City of Mountain View, 2025.



Source: SVA Architects 2024.

Figure 3-3
Proposed Site Plan



1st Floor - Net Areas

Auditorium	2,752 SF
Evidence	4,133 SF
Field Operations	1,890 SF
Intake	4,614 SF
Public Safety Support	2,652 SF
Support	3,396 SF
	19,437 SF

1st Floor Gross - 24,756 SF

Source: SVA Architects 2024.

Figure 3-4
First Floor Plan



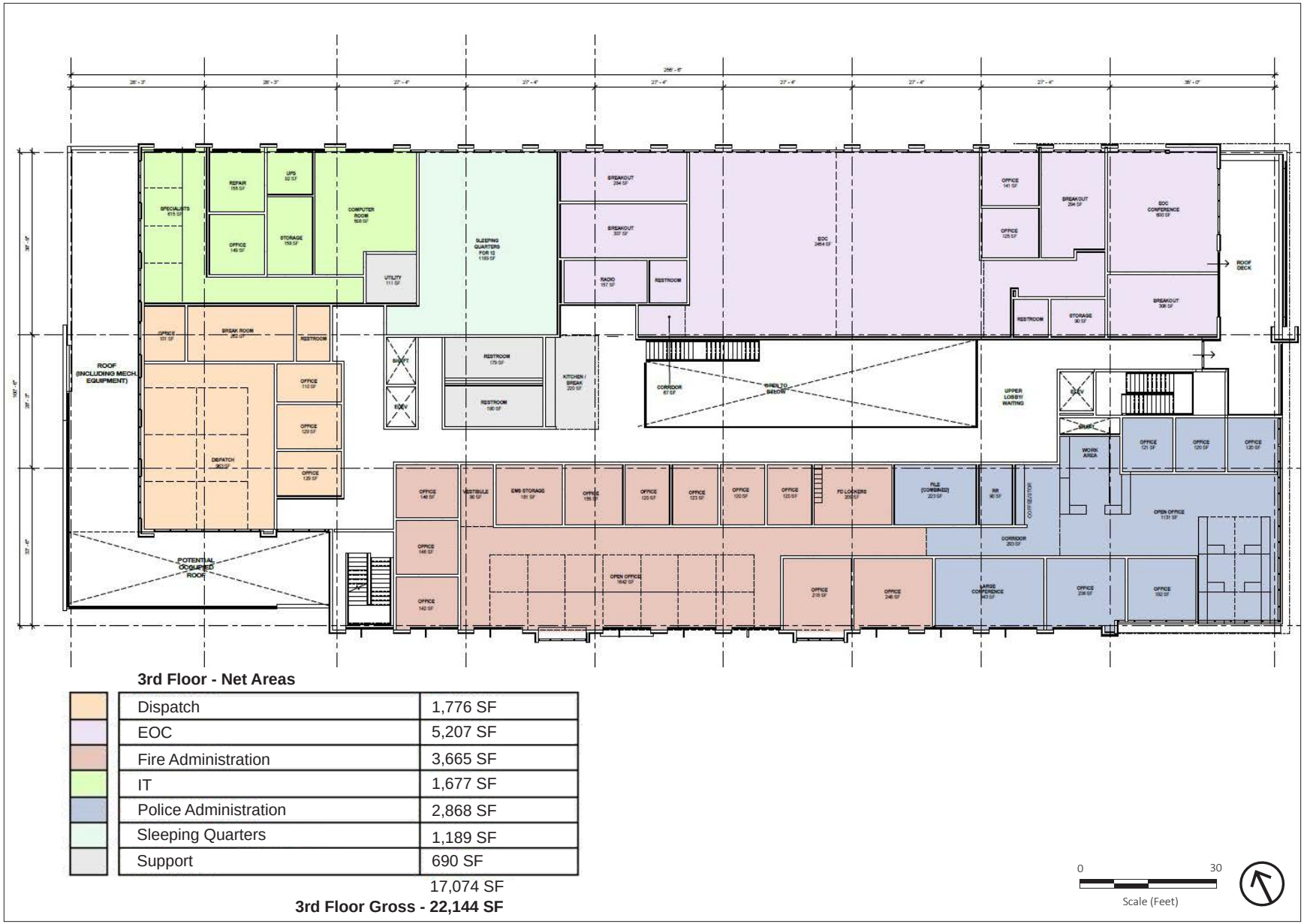
2nd Floor - Net Areas

	Field Operations	5,459 SF
	Lockers & Fitness	4,260 SF
	Field Operations	5,321 SF
	Support	1,568 SF
		16,608 SF

2nd Floor Gross - 21,951 SF

Source: SVA Architects 2024.

Figure 3-5
Second Floor Plan



Source: SVA Architects 2024.

Figure 3-6
Third Floor Plan

3.4.2 K-9 Training Area

The K-9 training area would be in the same location as the existing K-9 training area in the western portion of the project site and would be similar in size. The K-9 training area would be designed and utilized in a very similar fashion to its existing use, and no large upgrades are proposed.

3.4.3 Indoor Shooting Range

The proposed project includes a new indoor shooting range on the top level of the proposed parking garage. The shooting range would be approximately 12,215 square feet in size and would follow industry standards and regulations to address air quality effects, noise, reverberation, and echoes.

3.4.4 Site Access and Circulation

The proposed project would have two vehicular access points. One would be along Oak Street and would be secured, while the other access point would be along Franklin Street and would be open to the public.

Major arterials that can be used to access the project site are Highway 101 and the Central Expressway to the north, State Route 85 to the east, and West El Camino Real and Interstate 280 to the south. Additionally, the site can be accessed via the Caltrain railroad, which is directly north of the site with a station located 0.2 miles to the east.

3.4.5 Vehicular Parking

The proposed project includes a three-story parking garage that would include approximately 168 parking spaces. As previously described, the top level of the parking garage would contain the proposed indoor shooting range. The existing, 152-space surface parking lot would be reconfigured/relocated to other surface parking spaces for City personnel and a surface lot for future visitors to the proposed Public Safety Building. Currently, the current building site accommodates 152 parking spaces in total, including public/visitor parking and restricted-access employee parking areas. With the addition of the parking garage and surface parking lot reconfigurations, the proposed project would accommodate approximately 244 parking spaces, including the public/visitor parking lot. Out of the 244 total parking spaces across the site, 210 parking spaces would have restricted access and 34 spaces would be open to the public. Of the total parking spaces, 168 would be garage parking and the remaining 76 parking spaces would be dedicated to surface parking. All parking will meet the California Green Building Standards Code (24 CCR, Part 11, known as “CALGreen”) Tier 2 parking standards for electric vehicles.

3.4.6 Landscape

The proposed project would include improved landscaping around the project site. Site improvements would include ornamental landscaping and benches, an outdoor event space, shade structures, hardscape areas, and utility upgrades. Additional outdoor uses would include a public event plaza and a staff outdoor area. During development of the project site, 38 heritage trees would need to be removed; these include Coast redwood and Raywood ash trees.

3.4.7 Utilities

The proposed project would include a pump house and production well, and communications tower. The production well and pump house would be located on the northern eastern portion of the project site within the secure surface parking lot.

The project would be designed as an all-electric building and would not include any natural gas usage.

3.4.8 Project Construction

The project is preliminarily scheduled to start in late 2025 and be completed in early 2028. The project would be completed in three development phases. In the first phase, the site would be prepared and selective demolition would occur to allow for construction of the proposed Public Safety Building; in the second phase, the Public Safety Building would be constructed; in the third phase, the remainder of the existing building would be removed and the proposed parking garage and shooting range would be developed.

Construction activities would include building and asphalt demolition, trenching for utilities, site preparation and rough grading, building construction, paving, and architectural coating. No pile driving, rock blasting, crushing or excavation would occur during the construction phase. Construction would take place from 7:00 a.m. to 4:00 p.m., Monday through Friday, as allowed by the Mountain View Municipal Code Section 8.70, *Construction Noise*. The active construction and staging areas would be on the project site.

3.5 INTENDED USES OF THE EIR

It is the intent of this Draft EIR to evaluate the environmental impacts of the proposed project, thereby enabling the City of Mountain View, other responsible agencies, and interested parties to make informed decisions with respect to the requested entitlements. This Draft EIR is a project-level Draft EIR that examines the environmental impacts of the proposed project. This Draft EIR also addresses various actions by the City and others to adopt and implement the proposed project.

3. Project Description

The Draft EIR is intended to disclose to the public, agencies, and decision makers the proposed project's details, analyses of the proposed project's potential environment impacts, and identification of feasible mitigation or alternatives that would lessen or reduce significant environmental impacts.

This Draft EIR will serve as the primary environmental document for all actions associated with the Mountain View Public Safety Building, including any discretionary approvals requested or required to implement the proposed project. The City of Mountain View is the lead agency under CEQA and has the principal approval authority over the proposed project.

In order to implement the proposed project, the City of Mountain View would issue the following permits and approvals:

- Certification of this EIR
- Permits required to implement the proposed project, including, but not limited to:
  - Demolition permit
  - Tree removal permit
  - Grading permit
  - Utility permits
  - Building permits
- Other agreements or actions of the City in furtherance of the proposed project

To approve the proposed project, the City of Mountain View City Council must first certify the Final EIR. The City Council will consider the information in the EIR when making its decision to approve or deny the proposed project, or in directing modifications to the proposed project in response to the EIR's findings and mitigation measures.

3. Project Description

This page has been intentionally left blank.

4. Environmental Analysis

Chapter 4 examines the environmental setting of the proposed project, analyzes its effects and the significance of its impacts, and recommends mitigation measures to reduce or avoid impacts. This chapter has a separate section for each environmental issue area that was determined to need further study in the EIR. This scope was determined in the initial study and notice of preparation (NOP), which were published December 2024 (see Appendix A, *Notice of Preparation, Initial Study, and Scoping Comments*), and through public and agency comments received during the NOP comment period from December 10, 2024 to January 15, 2025. Environmental topics and their corresponding sections and abbreviations are:

- 4.1 Air Quality (AIR)
- 4.2 Biological Resources (BIO)
- 4.3 Cultural and Tribal Cultural Resources (CUL)
- 4.4 Geology and Soils (GEO)
- 4.5 Greenhouse Gas Emissions (GHG)
- 4.6 Hazards and Hazardous Materials (HAZ)
- 4.7 Noise (NOI)
- 4.8 Transportation (TRA)

Sections 4.1 through 4.8 provide a detailed discussion of the environmental setting, impacts associated with the proposed project, and mitigation measures designed to reduce significant impacts where required and when feasible. The residual impacts following the implementation of any mitigation measure are also discussed.

The initial study also determined that certain issues under an environmental topic would not be significantly affected by implementation of the project; these issues are not discussed further in this EIR.

ORGANIZATION OF ENVIRONMENTAL ANALYSIS

To assist the reader with comparing information between environmental issues, each section is organized under these major headings:

- **Regulatory Background** offers an overview of applicable laws, regulations, plans, and policies relevant to each environmental topic.

- **Existing Conditions** offers a description of the existing environmental conditions, providing a baseline against which the impacts of the proposed project can be compared.
- **Significance Criteria** refer to the quantitative or qualitative standards, performance levels, thresholds, or criteria used to evaluate whether an impact is significant. These standards are based primarily on the CEQA Guidelines unless otherwise noted.
- **Project Impact Analysis** provides a detailed discussion of the potential direct and indirect impacts of the proposed project. Mitigation measures are included as necessary.
- **Cumulative Impact Analysis** provides an overview of the geographic setting and cumulative projects considered in the cumulative impact assessment. Significant cumulative impacts are identified and mitigation measures are included as necessary.

LEVELS OF SIGNIFICANCE

The level of significance is identified for each impact in this Draft EIR. Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

- **No impact.** The project would result in no adverse effect on the environment.
- **Less than significant.** The project would not exceed the established significance criteria.
- **Significant.** The project would exceed the established significance criteria. For each significant impact, the EIR identifies mitigation measures to reduce, eliminate, or avoid the adverse effect. If one or more mitigation measures would reduce the impact to a less-than-significant level successfully, this is stated in the EIR.
- **Significant and unavoidable.** The project would exceed the established significance criteria, and no feasible mitigation measures are available to reduce the impact to a less-than-significant level.

CUMULATIVE IMPACTS

A cumulative impact consists of an impact created as a result of the combination of the project evaluated in the EIR, together with other reasonably foreseeable projects causing related impacts. CEQA Guidelines Section 15130 requires an EIR to discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." Cumulative effects could occur when future development under the project is combined with development in the surrounding area or, in some instances, in the entire region.

Pursuant to CEQA Guidelines Section 15130(a)(3), where a cumulative impact is significant when compared to baseline conditions, the analysis must address whether the project's

contribution to the significant cumulative impact is "considerable." If the contribution of the project is considerable, then the EIR must identify potentially feasible measures that could avoid or reduce the magnitude of the project's contribution to a less-than-considerable level. If the project's contribution is not considerable, it is considered less than significant and no mitigation for the project's contribution is required.

CEQA Guidelines Section 15130[b][1] states that the information used in the analysis of cumulative impacts should come from one or two sources:

A. A list of past, present, and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency; or

B. A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

The cumulative impact analyses in this EIR use method A and considers the two planning projects and 14 development projects listed in Table 4-1, *Cumulative Projects List*.

Table 4-1 Cumulative Projects List

Name/Location	Description	Status	Approximate Distance from Project Site
Downtown Precise Plan Comprehensive Update	Comprehensive update to 1988 Precise Plan	Planning Process in Progress	0 miles (adjacent to project site)
Moffett Boulevard Precise Plan	New Precise Plan	Planning Process in Progress	0.1 miles
333 Franklin Street	Residential projects with 14 housing units	Under Review	0.1 miles
701 West Evelyn Avenue	4-story commercial building with 6,500 square feet of retail space and 28,090 square feet of office space	Approved	0.2 miles
705 West Dana Street	3-story commercial building with 18,800 square feet of commercial, restaurant, and office space with parking	Approved	0.2 miles
City Lot 12 (West Side of Bryant Street between	5-story mixed-use development with 120 housing units and 2,300 square feet	Approved	0.2 miles

4. Environmental Analysis

Table 4-1 Cumulative Projects List

Mercy and California Streets)	of commercial space		
231-235 Hope Street	4-story residential development with 9 housing units	Under Construction	0.2 miles
747 West Dana Street	Commercial development with 7,000 square feet of office space and 1,600 square feet of retail space	Under Construction	0.2 miles
756 California Street	3-story commercial building with 6,997 square feet of retail and office space	Approved	0.3 miles
400 Moffett Boulevard	6-story residential development with 175 housing units; 2,373 square feet of commercial/retail space; 7,000 square feet of residential amenities; and parking	Under Review	0.4 miles
590 Castro Street	4-story office development with 105,255 square feet of office space and parking	Approved	0.4 miles
1265 Montecito Avenue	5-story residential development with 84 housing units and parking	Under Construction	0.4 miles
777 West Middlefield Road	Residential development with 716 housing units	Under Construction	0.5 miles
555 West Middlefield Road	Residential addition to add 323 housing units, a new amenity/leasing building, parking, and a public park	Approved	0.5 miles
969 Hope Street and 679 Fairmont Avenue	7-story residential project with 36 housing units and parking	Under Review	0.6 miles
881 Castro Street	8-story mixed-use development with 140 housing units; 13,352 square feet of commercial space; and below-grade parking	Under Review	0.6 miles

Source: City of Mountain View, January 2025, https://www.mountainview.gov/home/showpublisheddocument/10653/638735936825030000.

The cumulative discussions in Sections 4.1 through 4.8 explain the geographic scope of the area affected by each cumulative effect (e.g., immediate project vicinity, county, watershed, air basin), which depends on the environmental topic being analyzed. For example, in assessing macroscale air quality impacts, all development in the air basin contributes to regional emissions of criteria pollutants, and basinwide projections of emissions are the best tool for determining the cumulative impact. In assessing aesthetic impacts, on the other hand, only development in the local area of change would contribute to a cumulative visual effect because the area of change is only visible near that area.

4.1 AIR QUALITY

This section of the Draft Environmental Impact Report (EIR) describes the potential impacts to air quality due to adoption and implementation of the proposed project. This section describes the regulatory framework and existing conditions, identifies criteria used to determine impact significance, provides an analysis of the potential air quality impacts, and identifies feasible mitigation measures that could minimize any potentially significant impacts. This evaluation is based on the methodology recommended by the Bay Area Air District (Air District), formally the Bay Area Air Quality Management District, for project-level analyses. Cumulative impacts related to air quality are based on the regional boundaries of the San Francisco Bay Area Air Basin (SFBAAB). Criteria air pollutant emissions modeling is included in Appendix B, *Air Quality and Greenhouse Gas Emissions Data*, of this Draft Environmental Impact Report (EIR).

Terminology

The following are definitions for terms used throughout this chapter:

- **AAQS.** Ambient Air Quality Standards.
- **CES.** CalEnviroScreen. CES is a mapping tool that helps identify the California communities most affected by sources of pollution and where people are often especially vulnerable to pollution's effects.
- **Concentrations.** The amount of pollutant material per volumetric unit of air. Concentrations are measured in parts per million (ppm), parts per billion (ppb), or micrograms per cubic meter ($\mu g/m^3$).
- **Criteria Air Pollutants.** Air pollutants under the Federal Clean Air Act (carbon monoxide, nitrogen oxides, lead, sulfur oxides, ozone, and coarse and fine particulates).
- **DPM.** Diesel particulate matter.
- **Emissions.** The actual quantity of pollutant, measured in pounds per day or tons per year.
- **Impacted Community**. Unincorporated communities in Santa Clara County that are disproportionately burdened by pollution as defined by the County in the proposed General Plan using CES data.
- **Overburdened Community**. Defined by the Air District as an area located within a census tract identified by CES, Version 4, having an overall CES score at or above the 70th percentile, or located within 1,000 feet of any such census tract.
- **ppm.** Parts per million.
- **Sensitive receptor.** Land use types that are considered more sensitive to air pollution than others due to the types of population groups or activities involved. These land uses include residential, retirement facilities, hospitals, and schools.
- **TAC.** Toxic air contaminant.
- **$\mu g/m^3$.** Micrograms per cubic meter.
- **VMT.** Vehicle miles traveled.

4.1 Air Quality

AIR POLLUTANTS OF CONCERN

Criteria Air Pollutants

The pollutants emitted into the ambient air by stationary and mobile sources are categorized as primary and/or secondary pollutants. Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_X), sulfur dioxide (SO_2), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), and lead (Pb) are primary air pollutants. Of these, CO, SO_2, NO_2, PM_{10}, and $PM_{2.5}$ are "criteria air pollutants," which means that AAQS have been established for them. VOC and NO_X are criteria pollutant precursors that form secondary criteria air pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O_3) and nitrogen dioxide (NO_2) are the principal secondary pollutants. Table 4.1-1, *Criteria Air Pollutant Health Effects Summary*, summarizes the potential health effects associated with the criteria air pollutants.

Table 4.1-1 Criteria Air Pollutant Health Effects Summary

Pollutant	Health Effects	Examples of Sources
Carbon Monoxide (CO)	Chest pain in heart patients Headaches, nausea Reduced mental alertness Death at very high levels	Any source that burns fuel such as cars, trucks, construction and farming equipment, and residential heaters and stoves
Ozone (O_3)	Cough, chest tightness Difficulty taking a deep breath Worsened asthma symptoms Lung inflammation	Atmospheric reaction of organic gases with nitrogen oxides in sunlight
Nitrogen Dioxide (NO_2)	Increased response to allergens Aggravation of respiratory illness	Same as carbon monoxide sources
Particulate Matter (PM_{10} and $PM_{2.5}$)	Hospitalizations for worsened heart diseases Emergency room visits for asthma	Cars and trucks (particularly diesels) Fireplaces and woodstoves Windblown dust from overlays, agriculture,
Sulfur Dioxide (SO_2)	Aggravation of respiratory disease (e.g., asthma and emphysema) Reduced lung function	Combustion of sulfur-containing fossil fuels, smelting of sulfur-bearing metal ores, and industrial processes
Lead (Pb)	Behavioral and learning disabilities in children	Contaminated soil

Source: California Air Resources Board, 2018, Reduce Your Exposure to Particle Pollution, https://ww2.arb.ca.gov/resources/fact-sheets/reduce-your-exposure-particle-pollution, accessed on May 20, 2024. South Coast Air Quality Management District, 2005, Guidance Document for Addressing Air Quality, Issues in General Plans and Local Planning, https://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4, accessed on May 20, 2024.

Toxic Air Contaminants

People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems.[1] By the last update to the TAC list in December 1999, CARB had designated 244 compounds as TACs.[2] Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. There are no air quality standards for TACs. Instead, TAC impacts are evaluated by calculating the health risks associated with a given exposure. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most relevant to the proposed project being particulate matter from diesel-fueled engines.

Diesel Particulate Matter

In 1998, CARB identified DPM as a TAC. Almost all diesel exhaust particles are 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs. Long-term (chronic) inhalation of DPM is likely a lung cancer risk. Short-term (i.e., acute) exposure can cause irritation and inflammatory symptoms and may exacerbate existing allergies and asthma symptoms.[3]

Placement of New Sensitive Receptors

Because placement of sensitive land uses falls outside CARB's jurisdiction, CARB developed and approved the *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) to address the siting of sensitive land uses in the vicinity of freeways, distribution centers, rail yards, ports, refineries, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities. This guidance document was developed to assess compatibility and associated health risks when placing sensitive receptors near existing pollution sources.

In 2017, CARB provided a supplemental technical advisory to the handbook for near-roadway air pollution exposure, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways.* Strategies include practices and technologies that reduce traffic emissions, increase dispersion of traffic pollution (or the dilution of pollution in the air), or remove pollution from the air.[4]

[1] US Environmental Protection Agency, 2024, Health and Environmental Effects of Hazardous Air Pollutants. https://www.epa.gov/haps/health-and-environmental-effects-hazardous-air-pollutants, accessed on May 20, 2024.
[2] California Air Resources Board, 1999, Final Staff Report: Update to the Toxic Air Contaminant List, https://ww2.arb.ca.gov/sites/default/files/classic/toxics/tac/update98/update98.htm, accessed on May 20, 2024.
[3] US Environmental Protection Agency, May 2002, Health Assessment Document for Diesel Engine Exhaust, prepared by the National Center for Environmental Assessment, Washington, DC, for the Office of Transportation and Air Quality, EPA/600/8-90/057F, https://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=29060, accessed on May 20, 2024.
[4] California Air Resources Board, April 2017, Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways, https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf, accessed on May 20, 2024.

4.1 Air Quality

4.1.1 Regulatory Background

AAQS have been adopted at the State and federal levels for criteria air pollutants. In addition, both the State and federal government regulate the release of TACs. Land uses in the City of Mountain View are subject to the rules and regulations imposed by the Air District, the California AAQS adopted by CARB, and National AAQS adopted by the US Environmental Protection Agency (EPA). Federal, State, regional, and local laws, regulations, plans, or guidelines that are potentially applicable to the proposed project are summarized in this section.

FEDERAL AND STATE

Ambient Air Quality Standards

The Clean Air Act (CAA) allows states to adopt more stringent standards or include other pollutants. The California CAA requires all areas of the state to achieve and maintain the California AAQS by the earliest practical date. The California AAQS tend to be more restrictive than the National AAQS.

The National and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect "sensitive receptors" most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Both California and the federal government have established health-based AAQS for seven air pollutants. These pollutants are ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), and lead (Pb). In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

- California has also adopted a host of other regulations that reduce criteria pollutant emissions.
- AB 1493: Pavley Fuel Efficiency Standards.
- Heavy-Duty (Tractor-Trailer) Greenhouse Gas (GHG) Regulation.
- California Code of Regulations (CCR) Title 20: Appliance Energy Efficiency Standards.
- 24 CCR, Part 6: Building and Energy Efficiency Standards.
- 24 CCR, Part 11: Green Building Standards Code.

Tanner Air Toxics Act and Air Toxics Hot Spot Information and Assessment Act

Public exposure to TACs is a significant environmental health issue in California. The California Health and Safety Code defines a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health" (17 CCR Section 93000). A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal CAA (42 US Code Section 7412[b]) is a TAC. Under State law, the California EPA, acting through CARB, is authorized to identify a substance as a TAC if it is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or may pose a present or potential hazard to human health.

California regulates TACs primarily through Assembly Bill (AB) 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics "Hot Spot" Information and Assessment Act of 1987). The Tanner Air Toxics Act set up a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an "airborne toxics control measure" for sources that emit that TAC. If there is a safe threshold for a substance (i.e., a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate "toxics best available control technology" to minimize emissions. To date, CARB has established formal control measures for 11 TACs that are identified as having no safe threshold.

Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High-priority facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, are required to communicate the results to the public through notices and public meetings.

CARB has promulgated the following specific rules to limit TAC emissions:

- **13 CCR Chapter 10 Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling**. Generally restricts on-road diesel-powered commercial motor vehicles with a gross vehicle weight rating of greater than 10,000 pounds from idling more than five minutes.
- **13 CCR Chapter 10 Section 2480:** Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools. Generally restricts a school bus or transit bus from idling for more than five minutes when within 100 feet of a school.
- **13 CCR Section 2477 and Article 8:** Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate. Regulations established to control emissions associated with diesel-powered TRUs.

4.1 Air Quality

REGIONAL

Bay Area Air District

The Air District is the agency responsible for ensuring that the National and California AAQS are attained and maintained in the SFBAAB. Air quality conditions in the SFBAAB have improved significantly since the Air District was created in 1955. The Air District prepares air quality management plans (AQMP) to attain AAQS in the SFBAAB. The Air District prepares ozone attainment plans for the National O_3 standard and clean air plans for the California O_3 standard. The Air District prepares these AQMPs in coordination with Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) to ensure consistent assumptions about regional growth.

Bay Area Air District 2017 Clean Air Plan

The Air District adopted the 2017 "Clean Air Plan: Spare the Air, Cool the Climate" (2017 Clean Air Plan) on April 19, 2017, making it the most recently adopted comprehensive plan. The 2017 Clean Air Plan incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools. The 2017 Clean Air Plan serves as an update to the adopted Bay Area 2010 Clean Air Plan and continues to provide the framework for SFBAAB to achieve attainment of the California and National AAQS. The 2017 Clean Air Plan updates the Bay Area's ozone plan, which is based on the "all feasible measures" approach to meet the requirements of the California CAA. It sets a goal of reducing health risk impacts to local communities by 20 percent between 2015 and 2020 and lays the groundwork for reducing GHG emissions in the Bay Area to meet the State's 2030 GHG reduction target and 2050 GHG reduction goal. It also includes a vision for the Bay Area in a post-carbon year 2050 that encompasses the following:

- Construct buildings that are energy efficient and powered by renewable energy.
- Walk, bicycle, and use public transit for the majority of trips and use electric-powered autonomous public transit fleets.
- Incubate and produce clean energy technologies.
- Live a low-carbon lifestyle by purchasing low-carbon foods and goods in addition to recycling and putting organic waste to productive use.

A comprehensive multipollutant control strategy was developed to be implemented in the next three to five years to address public health and climate change and to set a pathway to achieve the 2050 vision. The control strategy includes 85 control measures to reduce emissions of ozone, particulate matter, TACs, and GHG from a full range of emission sources. These control measures cover the following sectors: (1) stationary (industrial) sources, (2) transportation, (3)

energy, (4) agriculture, (5) natural and working lands, (6) waste management, (7) water, (8) super-GHG pollutants, and (9) buildings.

- The proposed control strategy is based on the following key priorities:
- Reduce emissions of criteria air pollutants and TACs from all key sources.
- Reduce emissions of "super-GHGs" such as methane, black carbon, and fluorinated gases.
- Decrease demand for fossil fuels (gasoline, diesel, and natural gas).
  - Increase efficiency of the energy and transportation systems.
  - Reduce demand for vehicle travel, and high-carbon goods and services.
- Decarbonize the energy system.
  - Make the electricity supply carbon-free.
  - Electrify the transportation and building sectors.[5]

Community Air Risk Evaluation Program

The Air District's Community Air Risk Evaluation (CARE) program was initiated in 2004 to evaluate and reduce health risks associated with exposure to outdoor TACs in the Bay Area, primarily DPM. The last update to this program was in 2014. Based on findings of the latest report, DPM was found to account for approximately 85 percent of the cancer risk from airborne toxics. Carcinogenic compounds from gasoline-powered cars and light duty trucks were also identified as significant contributors: 1,3-butadiene contributed 4 percent of the cancer risk-weighted emissions, and benzene contributed 3 percent. Collectively, five compounds—DPM, 1,3-butadiene, benzene, formaldehyde, and acetaldehyde—were found to be responsible for more than 90 percent of the cancer risk attributed to emissions. All of these compounds are associated with emissions from internal combustion engines. The most important sources of cancer risk-weighted emissions were combustion-related sources of DPM, including on-road mobile sources (31 percent), construction equipment (29 percent), and ships and harbor craft (13 percent). Overall, cancer risk from TAC dropped by more than 50 percent between 2005 and 2015, when emissions inputs accounted for State diesel regulations and other reductions.

The major contributor to acute and chronic non-cancer health effects in the Air District is acrolein (C_3H_4O). Major sources of acrolein are on-road mobile sources and aircraft near freeways and commercial and military airports. Currently CARB does not have certified emission factors or an analytical test method for acrolein. Since the appropriate tools needed to implement and enforce acrolein emission limits are not available, the Air District does not conduct health risk screening analysis for acrolein emissions.

[5] Bay Area Air District, April 19, 2017, Final 2017 Clean Air Plan. Spare the Air Cool the Climate, A Blueprint for Clean Air and Climate Protection in the Bay Area, https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?rev=8c588738a4fb455b9cabb27360409529&sc_lang=en, accessed on May 20, 2024.

4.1 Air Quality

Assembly Bill 617 Community Action Plans

AB 617 develops a new community-focused program to reduce exposure more effectively to air pollution and preserve public health in environmental justice communities. AB 617 directs CARB and all local air districts to take measures to protect communities disproportionally impacted by air pollution through monitoring and implementing air pollution control strategies.

On September 27, 2018, CARB approved the Air District's recommended communities for monitoring and emission reduction planning. The State approved communities for year 1 of the program as well as communities that would move forward over the next five years. Bay Area recommendations included all the CARE areas, areas with large sources of air pollution (e.g., refineries, seaports, and airports), areas identified via statewide screening tools as having pollution and/or health burden vulnerability, and areas with low life expectancy.[6]

Bay Area Air District Rules and Regulations

Regulation 7, Odorous Substances

Sources of objectionable odors may occur within the unincorporated county. The Air District's Regulation 7, Odorous Substances, places general limitations on odorous substances and specific emission limitations on certain odorous compounds. Odors are also regulated under Air District Regulation 1, Rule 1-301, *Public Nuisance*, which states that "no person shall discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or the public; or which endangers the comfort, repose, health or safety of any such persons or the public, or which causes, or has a natural tendency to cause, injury or damage to business or property." Under the Air District's Rule 1-301, a facility that receives three or more violation notices within a 30-day period can be declared a public nuisance.

Other Bay Area Air District Regulations

In addition to the plans and programs described above, the Air District administers a number of specific regulations on various sources of pollutant emissions that would apply to the proposed project:

- Regulation 2, Rule 2, Permits, New Source Review
- Regulation 2, Rule 5, New Source Review of Toxic Air Contaminants
- Regulation 2, Rule 6, Permits, Major Facility Review
- Regulation 6, Rule 1, General Requirements
- Regulation 6, Rule 2, Commercial Cooking Equipment
- Regulation 8, Rule 3, Architectural Coatings

[6] Bay Area Air District, April 19, 2019, AB 617 Fact Sheet. San Francisco Bay Area Community Health Protection Program, https://www.baaqmd.gov/~/media/files/ab617-community-health/2019_0325_ab617onepager-pdf.pdf?la=en&rev=9f6dcd6de8854fd9853ff0498c6bbdff, accessed on May 20, 2024.

- Regulation 8, Rule 4, General Solvent and Surface Coatings Operations
- Regulation 11, Rule 2, Asbestos, Demolition, Renovation and Manufacturing

Plan Bay Area 2050

MTC and ABAG adopted Plan Bay Area 2050 on October 21, 2021.[7] Plan Bay Area provides transportation and environmental strategies to continue to meet the regional transportation-related GHG reduction goals of SB 375, which is described in Section 4.5, *Greenhouse Gas Emissions*, of this Draft EIR. Strategies to reduce GHG emissions include focusing housing and commercial construction in walkable, transit-accessible places; investing in transit and active transportation; and shifting the location of jobs to encourage shorter commutes. To achieve MTC's/ABAG's sustainable vision for the Bay Area, the Plan Bay Area land use concept plan for the region concentrates the majority of new population and employment growth in the region in Priority Development Areas (PDAs). PDAs are transit-oriented, infill development opportunity areas within existing communities. An overarching goal of the regional plan is to concentrate development in areas where there are existing services and infrastructure rather than allocate new growth to outlying areas where substantial transportation investments would be necessary to achieve the per capita passenger vehicle, VMT, and associated GHG emissions reductions.

LOCAL

Valley Transportation Authority 2021 Congestion Management Program Document

The Valley Transportation Authority (VTA) Congestion Management Program (CMP) aims to adopt transportation improvement programs for Santa Clara County.[8] The CMP provides a roadmap to reduce congestion, land use decision-making and air quality programs among local jurisdictions. The 2021 update also documents changes to VTA's Transportation Demand Program (TDM), regional planning efforts by ABAG and MTC, and future updates to the Multimodal Improvement Plan (MIP). Consistent with State law and the MTC's Regional Transportation Plan, the CMP contains a performance element to evaluate current and future multi-modal system performances, a seven-year capital improvement program (CIP), a program to analyze the impacts of land use decisions, and a travel demand element to promote more transportation alternatives. In addition, VTA's updated CMP includes multi-modal performance standards and trip reduction and transportation demand management strategies consistent with the goal of reducing regional vehicle miles traveled in accordance with Senate Bill 375. The 2021 CMP also includes a discussion of Senate Bill 743 implementation and relationship to the CMP auto LOS standard.

[7] Association of Bay Area Governments and the Metropolitan Transportation Commission., October 2021, Plan Bay Area 2050, https://abag.ca.gov/sites/default/files/documents/2021-11/Plan_Bay_Area_2050_October_2021.pdf, accessed on May 20, 2024.
[8] Valley Transportation Authority, 2021, 2021 Congestion Management Program Document, https://www.vta.org/sites/default/files/2022-01/2021CMPDocumentV2_Reduced.pdf, accessed on May 13, 2024.

4.1 Air Quality

Mountain View Code of Ordinances

The Mountain View Code of Ordinances includes various directives to minimize adverse impacts to air quality in the city of Mountain View. The following Ordinances would apply to the proposed project that would reduce air quality impacts:

- Section 8.20.12, *Subsection 101.10.1.2.2 added*, adopts the green building standards for nonresidential new construction. All nonresidential new construction must comply with the following:
  - The mandatory measures of the 2022 California Green Building Standards Code and City of Mountain View Reach Code as modified.
  - Shall meet the intent of LEED ® Gold certified;
  - Shall meet the parking requirements per Table 101.10 and Table A5.106.5.3.2;
  - Shall demonstrate energy compliance to meet or exceed Title 24, Part 6.
- Section 8.20.14, *Table 101.10 added*, adopts applicable California Green Building Standards Code.

Section 8.20.14, *Subsection 5.106.5.3.2 amended and Table 5.106.5.3.2 added*, adopts and amends applicable Tier 2 CALGreen electric vehicle (EV) parking standards.

4.1.2 Existing Conditions

SAN FRANCISCO BAY AREA AIR BASIN CONDITIONS

California is divided geographically into air basins for the purpose of managing the air resources of the State on a regional basis. An air basin generally has similar meteorological and geographic conditions throughout. The State is divided into 15 air basins, and the City of Mountain View is in the SFBAAB. The discussion below identifies the natural factors in the Air Basin that affect air pollution. Air pollutants of concern are criteria air pollutants and TACs. Federal, State, and local air districts have adopted laws and regulations intended to control and improve air quality.

The Air District is the regional air quality agency for the SFBAAB, which comprises all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara Counties; the southern portion of Sonoma County; and the southwestern portion of Solano County. Air quality in this area is determined by such natural factors as topography, meteorology, and climate, in addition to the presence of existing air pollution sources and ambient conditions.[9]

[9] Bay Area Air District, May 2017, California Environmental Quality Act Air Quality Guidelines, http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf, accessed on May 20, 2024.

4.1 Air Quality

Meteorology

The SFBAAB is characterized by complex terrain, consisting of coastal mountain ranges, inland valleys, and bays, which distort normal wind flow patterns. The Coast Range[10] splits in the Bay Area, creating a western coast gap, the Golden Gate, and an eastern coast gap, the Carquinez Strait, which allows air to flow in and out of the Bay Area and the Central Valley. The climate is dominated by the strength and location of a semi-permanent, subtropical high-pressure cell. During the summer, the Pacific high-pressure cell is centered over the northeastern Pacific Ocean, resulting in stable meteorological conditions and a steady northwesterly wind flow. Upwelling of cold ocean water from below the surface because of the northwesterly flow produces a band of cold water off the California coast. The cool and moisture-laden air approaching the coast from the Pacific Ocean is further cooled by the presence of the cold-water band, resulting in condensation and the presence of fog and stratus clouds along the Northern California coast. In the winter, the Pacific high-pressure cell weakens and shifts southward, resulting in wind flow offshore, the absence of upwelling, and the occurrence of storms. Weak inversions coupled with moderate winds result in a low air pollution potential.

Wind Patterns

During the summer, winds flowing from the northwest are drawn inland through the Golden Gate and over the lower portions of the San Francisco Peninsula. Immediately south of Mount Tamalpais in Marin County, the northwesterly winds accelerate considerably and come more directly from the west as they stream through the Golden Gate. This channeling of wind through the Golden Gate produces a jet that sweeps eastward and splits off to the northwest toward Richmond and to the southwest toward San José when it meets the East Bay hills. Wind speeds may be strong locally in areas where air is channeled through a narrow opening, such as the Carquinez Strait, the Golden Gate, or the San Bruno gap.

The air flowing in from the coast to the Central Valley, called the sea breeze, begins developing at or near ground level along the coast in late morning or early afternoon and the sea breeze deepens and increases in velocity while spreading inland. Under normal atmospheric conditions, the air in the lower atmosphere is warmer than the air above it. In the winter, the SFBAAB frequently experiences stormy conditions with moderate to strong winds, as well as periods of stagnation with very light winds. Winter stagnation episodes (i.e., conditions where there is little mixing, which occurs when there is a lack of or little wind) are characterized by nighttime drainage flows in coastal valleys. Drainage is a reversal of the usual daytime air-flow patterns; air moves from the Central Valley toward the coast and back down toward the Bay from the smaller valleys within the SFBAAB.

[10] The Coast Range traverses California's west coast from Humboldt County to Santa Barbara County.

4.1 Air Quality

Temperature

Summertime temperatures in the Air Basin are determined in large part by the effect of differential heating between land and water surfaces. Because land tends to heat up and cool off more quickly than water, a large-scale gradient (differential) in temperature is often created between the coast and the Central Valley, and small-scale local gradients are often produced along the shorelines of the ocean and bays. The temperature gradient near the ocean is also exaggerated, especially in summer, because of the upwelling of cold water from the ocean bottom along the coast. On summer afternoons, the temperatures at the coast can be 35 degrees Fahrenheit (°F) cooler than temperatures 15 to 20 miles inland; at night, this contrast usually decreases to less than 10°F. In the winter, the relationship of minimum and maximum temperatures is reversed. During the daytime the temperature contrast between the coast and inland areas is small, whereas at night the variation in temperature is large.

Precipitation

The Air Basin is characterized by moderately wet winters and dry summers. Winter rains (November through March) account for about 75 percent of the average annual rainfall. The amount of annual precipitation can vary greatly from one part of the Air Basin to another, even within short distances. In general, total annual rainfall can reach 40 inches in the mountains, but it is often less than 16 inches in sheltered valleys.

During rainy periods, ventilation (rapid horizontal movement of air and injection of cleaner air) and vertical mixing (an upward and downward movement of air) are usually high, and thus pollution levels tend to be low (i.e., air pollutants are dispersed more readily into the atmosphere rather than accumulate under stagnant conditions). However, during the winter, frequent dry periods do occur, where mixing and ventilation are low and pollutant levels build up.

Wind Circulation

Low wind speed contributes to the buildup of air pollution because it allows more pollutants to be emitted into the air mass per unit of time. Light winds occur frequently during periods of low sun (fall and winter, and early morning) and at night. These are also periods when air pollutant emissions from some sources are at their peak, namely, commuter traffic (early morning) and wood-burning appliances (nighttime). The problem can be compounded in valleys, when weak flows carry the pollutants up-valley during the day, and cold air drainage flows move the air mass down-valley at night. Such restricted movement of trapped air provides little opportunity for ventilation and leads to buildup of pollutants to potentially unhealthful levels.

Inversions

An inversion is a layer of warmer air over a layer of cooler air. Inversions affect air quality conditions significantly because they influence the mixing depth (i.e., the vertical depth in the atmosphere available for diluting air contaminants near the ground). There are two types of inversions that occur regularly in the SFBAAB. Elevation inversions[11] are more common in the summer and fall, and radiation inversions[12] are more common during the winter. The highest air pollutant concentrations in the SFBAAB generally occur during inversions.

ATTAINMENT STATUS OF THE SFBAAB

The AQMP provides the framework for air quality basins to achieve attainment of the State and federal AAQS through the State Implementation Plan. Areas that meet AAQS are classified attainment areas, and areas that do not meet these standards are classified nonattainment areas. Severity classifications for O_3 range from marginal, moderate, and serious to severe and extreme.

- **Unclassified:** A pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.
- **Attainment:** A pollutant is in attainment if the AAQS for that pollutant was not violated at any site in the area during a three-year period.
- **Nonattainment:** A pollutant is in nonattainment if there was at least one violation of an AAQS for that pollutant in the area.
- **Nonattainment/Transitional:** A subcategory of the nonattainment designation. An area is designated nonattainment/transitional to signify that the area is close to attaining the AAQS for that pollutant.

The attainment status for the SFBAAB is shown in Table 4.1-2, *Attainment Status of Criteria Pollutants in the San Francisco Bay Area Air Basin.* The SFBAAB is currently designated a nonattainment area for California and National O_3, California and National $PM_{2.5}$, and California PM_{10} AAQS.

[11] When the air blows over elevated areas, it is heated as it is compressed into the side of the hill/mountain. When that warm air comes over the top, it is warmer than the cooler air of the valley.

[12] During the night, the ground cools off, radiating the heat to the sky.

4.1 Air Quality

Table 4.1-2 Attainment Status of Criteria Air Pollutants in the San Francisco Bay Area Air Basin

Pollutant	State	Federal
Ozone – 1-hour	Nonattainment	Classification revoked (2005)
Ozone – 8-hour	Nonattainment (serious)	Nonattainment (marginal) [1]
PM_{10}	Nonattainment	Unclassified/Attainment [2]
$PM_{2.5}$	Nonattainment	Unclassified/Attainment
CO	Attainment	Attainment
NO_2	Attainment	Unclassified
SO_2	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	Attainment	Unclassified/Attainment
All others	Unclassified/Attainment	Unclassified/Attainment

Source: California Air Resources Board, 2024, Maps of State and Federal Area Designations, https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations, accessed on May 13, 2024.
Notes:
1. Severity classification as of February 13, 2017.
2. In December 2014, US EPA issued final area designations for the 2012 primary annual PM2.5 National AAQS. Areas designated "unclassifiable/attainment" must continue to take steps to prevent their air quality from deteriorating to unhealthy levels. The effective date of this standard is April 15, 2015.

EXISTING AMBIENT AIR QUALITY

Existing levels of ambient air quality and historical trends and projections in the county are best documented by measurements taken by the Air District. The Air District has 30 permanent monitoring stations around the Bay Area. The nearest station is the Redwood City Monitoring Station, which monitors O_3, NO_2, and $PM_{2.5}$. Redwood City does not monitor PM_{10}, therefore, the nearest station for and PM_{10} is the San José-Jackson Street monitoring station. Data from this monitoring station is summarized in Table 4.1-3, *Ambient Air Quality Monitoring Summary*. The data show that the area regularly exceeds the State and federal one-hour, eight-hour O_3 standards and federal $PM_{2.5,}$ and occasionally exceeds the State and federal PM_{10} in the last three recorded years.

Table 4.1-3 Ambient Air Quality Monitoring Summary

Pollutant/Standard [a]	Number of Days Thresholds Were Exceeded and Maximum Levels		
	2020	2021	2022
Ozone (O_3) [a]			
State 1-Hour ≥ 0.09 ppm (days exceed threshold)	1	0	0
State & Federal 8-hour ≥ 0.070 ppm (days exceed threshold)	1	0	0
Max. 1-Hour Conc. (ppm)	0.098	0.085	0.079
Max. 8-Hour Conc. (ppm)	0.078	0.064	0.062
Nitrogen Dioxide (NO_2) [a]			
State 1-Hour ≥ 0.18 ppm (days exceed threshold)	0	0	0
Federal 1-Hour ≥ 0.100 ppm (days exceed threshold)	0	0	0
Max. 1-Hour Conc. (ppm)	0.046	0.041	0.044
Coarse Particulates (PM_{10}) [b]			
State 24-Hour > 50 µg/m^3 (days exceed threshold)	10	0	0
Federal 24-Hour > 150 µg/m^3 (days exceed threshold)	0	0	0
Max. 24-Hour Conc. (µg/m^3)	137.1	45.1	44.5
Fine Particulates ($PM_{2.5}$) [a]			
Federal 24-Hour > 35 µg/m^3 (days exceed threshold)	9	0	0
Max. 24-Hour Conc. (µg/m^3)	124.1	30.1	27.4

Source: California Air Resources Board, 2023, Air Pollution Data Monitoring Cards (2020, 2021, and 2022), https://www.arb.ca.gov/adam/topfour/topfour1.php, accessed February 21, 2024.
Notes: ppm = parts per million; ppb = parts per billion; µg/m^3 = micrograms per cubic meter; * = Data not available
a. Data for O_3, NO_2 and $PM_{2.5}$ obtained from the Redwood City Monitoring Station.
b. Data for PM_{10} obtained from the San José-Jackson Street Monitoring Station.

Sensitive Receptors

Some land use types are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases. The Air District defines sensitive receptors as "Facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals and residential areas".[13]

[13] Bay Area Air District, April 2023, California Environmental Quality Act Air Quality Guidelines, https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines.

4.1 Air Quality

Residential areas are also considered sensitive receptors to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Other sensitive receptors include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent, as the majority of the workers tend to stay indoors most of the time. In addition, the working population is generally the healthiest segment of the public.

Existing Emissions

The project site hosts the existing Mountain View Police Department on approximately 4.3 acres. As shown on Figure 3-2, *Aerial Photograph*, the project site is currently occupied by the Mountain View Police Department building, a 42-stall parking lot, a pump station, and a K-9 training area. As such, operations of the existing project site generate criteria air pollutants through the use of vehicles and on-site equipment, building natural gas consumption, and periodic application of paints and coatings.

4.1.3 Significance Criteria

The Initial Study prepared for this Draft EIR (see Appendix A, *Notice of Preparation, Initial Study, and Scoping Comments*) identified that the proposed project would not result in a significant impact for the following significance criterion:

> Would the project conflict with or obstruct implementation of the applicable air quality plan?

The proposed project would have a significant impact under Appendix G, *Environmental Checklist Form*, of the California Environmental Quality Act (CEQA) Guidelines if it would:

a) 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.

b) Expose sensitive receptors to substantial pollutant concentrations.

c) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

4.1.4 Project Impact Analysis

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts.

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

The Air District has identified thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including ROG, NO_X, CO, PM_{10}, and fine $PM_{2.5}$. Development projects below these significant thresholds are not expected to generate sufficient criteria air pollutant emissions to violate any AAQS or contribute substantially to an existing or projected air quality violation.

Regional Short-Term Construction Impacts

Construction activities produce combustion emissions from various sources, such as on-site heavy-duty construction vehicles, vehicles hauling materials to and from the site, and motor vehicles transporting the construction crew. Demolition and site preparation activities produce fugitive dust emissions (PM_{10} and $PM_{2.5}$). Air pollutant emissions from construction activities on site would vary daily as construction activity levels change. Construction activities associated with the project would result in emissions of ROG, NO_X, CO, PM_{10}, and fine $PM_{2.5}$.

Construction Fugitive Dust

Ground-disturbing activities during construction would generate fugitive dust (PM_{10} and $PM_{2.5}$). The amount of dust generated during construction would be highly variable and would be dependent on the amount, type, and moisture content of material being disturbed, as well as on meteorological conditions. If uncontrolled, PM_{10} and $PM_{2.5}$ levels downwind of actively disturbed areas could possibly exceed State standards, which would be a **significant** impact.

Impact AIR-1: Without mitigation, construction activities for the proposed project could generate fugitive dust that exceeds State standards.

> **Mitigation Measure AIR-1:** The project contractor shall comply with the Bay Area Air District's basic best management practices for reducing construction-related emissions of uncontrolled fugitive dust (coarse inhalable particulate matter [PM_{10}] and fine inhalable particulate matter [$PM_{2.5}$]):
>
> - All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

4.1 Air Quality

- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measures Title 13, Section 2485, of the California Code of Regulations). 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.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 miles per hour.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
- Publicly visible signs shall be posted with the telephone number and name of the person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.

These measures shall be noted on grading plans prepared by the applicant submitted to the City of Mountain View Building Division. The construction contractor shall implement these measures during ground disturbing activities. The City shall verify compliance that these measures have been implemented during normal construction site inspections.

Significance with Mitigation: Less than significant.

Construction Exhaust Emissions

Because the proposed project would involve demolition activities for the removal of the existing building and surface parking, the Air District construction screening criteria cannot be used for analyzing potential air quality impacts resulting from construction of the proposed project. Therefore, a quantified analysis of the proposed project's construction emissions was conducted using the California Emissions Estimator Model (CalEEMod) Version 2022.1 based on information provided by the City of Mountain View and default equipment mix for each construction activity during the approximately 30-month construction period.

Potential construction-related air quality impacts are determined by comparing the average daily criteria air pollutants emissions generated by the proposed project-related construction activities to the Air District significance thresholds in Table 4.1-4, *Construction-Related Criteria Air Pollutant Emissions Estimates*. Average daily emissions are based on the annual construction emissions divided by the total number of active construction days. As shown in Table 4.1-4, criteria air pollutant emissions from construction equipment exhaust would not exceed the Air District average daily thresholds. Therefore, impacts from project-related construction activities to the regional air quality would be **less than significant**.

Table 4.1-4 Construction-Related Criteria Air Pollutant Emissions Estimates

Year	Criteria Air Pollutants (tons/year) [a]					
	ROG	**NO_X**	**Fugitive PM_{10} [b]**	**Exhaust PM_{10}**	**Fugitive $PM_{2.5}$ [b]**	**Exhaust $PM_{2.5}$ [b]**
1	<1	2	<1	<1	<1	<1
2	<1	1	<1	<1	<1	<1
3	<1	1	<1	<1	<1	<1
Total	**1**	**4**	**1**	**<1**	**<1**	**<1**
	Criteria Air Pollutants (average lbs/day)[a]					
Average Daily Emissions [c]	3	13	3	<1	1	<1
Air District Average Daily Threshold	54	54	BMPs	82	BMPs	54
Exceeds Average Daily Threshold	**No**	**No**	**N/A**	**No**	**N/A**	**No**

4.1 Air Quality

Table 4.1-4 Construction-Related Criteria Air Pollutant Emissions Estimates

Year	Criteria Air Pollutants (tons/year) [a]					
	ROG	NO_X	Fugitive PM_{10} [b]	Exhaust PM_{10}	Fugitive $PM_{2.5}$ [b]	Exhaust $PM_{2.5}$ [b]

Source: California Air Pollution Control Officer's Association, April 2022, CalEEMod, California Emissions Estimator Model User Guide, Version 2022.1, https://www.caleemod.com/user-guide. See Appendix B, *Air Quality and Greenhouse Gas Emissions Data*.

Notes: Emissions may not total to 100 percent due to rounding. BMP = Best Management Practices; N/A = not applicable

a. Construction phasing and equipment mix are based on the preliminary information provided by the project applicant. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast Air Quality Management District of construction equipment and phasing for comparable projects.

b. Includes implementation of BMPs for fugitive dust control required by the Air District as mitigation, including watering disturbed areas a minimum of two times per day and reducing speed limit to 25 miles per hour on unpaved surfaces.

c. Average daily emissions are based on the total construction emissions divided by the total number of active construction days. The total number of construction days is estimated to be about 654 days.

Operational Impacts

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles). Emissions would also be generated from the shooting range; however, those emissions are anticipated to be highly controlled using high-efficiency indoor air filters due to their potential to contain lead. The primary source of long-term criteria air pollutant emissions generated by the proposed project would be emissions produced from project-generated vehicle trips. The proposed project would generate 602 daily vehicle trips, constituting an estimated increase of 88 new daily vehicle trips beyond existing conditions. Table 4.1-5, *Operational Criteria Air Pollutant Emissions Estimates*, identifies the criteria air pollutant emissions associated with the proposed project. It should be noted that the emission estimates herein do not reflect the net increase in emissions because they do not account for existing emissions that are already generated from operation of the existing site. As such, the emissions impact analysis herein is a conservative assessment of potential air quality impacts resulting from the proposed project.

Table 4.1-5 Operational Criteria Air Pollutant Emissions Estimates

Category	Criteria Air Pollutants (average lbs/day)			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Proposed Land Use 2024 Emissions				
Area	3	<1	<1	<1
Energy (natural gas)	-	-	-	-
On-Road Mobile	2	2	4	1
Total	*5*	*2*	*4*	*1*
Air District Thresholds	**54**	**54**	**82**	**54**
Exceed Threshold?	**No**	**No**	**No**	**No**

Source: Appendix B, *Air Quality and Greenhouse Gas Emissions Data*.

As shown in Table 4.1-6, the proposed project would not exceed the Air District's recommended operational criteria air pollutant emissions thresholds. As such, potential impacts resulting from operation of the proposed project would be **less than significant**.

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

The proposed project could expose sensitive receptors to elevated pollutant concentrations if it would cause or contribute significantly to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass, so they can be more readily correlated to potential health effects.

Localized Short-Term Construction Impacts

The proposed project would elevate concentrations of TACs and fugitive dust in the vicinity of sensitive land uses (i.e., sensitive receptors) during construction activities. Because the proposed project would result in the operation of diesel-fueled construction equipment during project construction, diesel particulate matter (DPM) is the TAC of concern for this analysis. The nearest receptors to the project site include adjacent residents, students at Mountain View Academy approximately 785 feet southeast of the project site, and students at Khan Lab School adjacent to the western project boundary. Construction activities would occur near these sensitive receptor locations. Consequently, an HRA of DPM and $PM_{2.5}$ concentration was prepared for the proposed project and is included in Appendix B, *Air Quality and Greenhouse Gas Emissions Data*, of this Draft EIR. Results of the analysis are shown in Table 4.1-6, *Construction Health Risk Assessment Results – Unmitigated*.

4.1 Air Quality

Table 4.1-6 Construction Health Risk Assessment Results – Unmitigated

Receptor	Project Level Risk [a]		
	Cancer Risk (per million)	Chronic Hazards [b]	Maximum Annual Average PM2.5 Concentration (µg/m3) [a,b]
MER – Resident	**70**	0.1	0.1
MER – Worker	1	<0.1	<0.1
MER – K-12 Student	8	0.1	0.1
Air District Threshold	**10**	**1.0**	**0.3**
Exceeds Threshold?	**Yes**	**No**	**No**

Notes: MER = maximally exposed resident.
Cancer risk calculated using the 2015 Office of Environmental Health Hazard Assessment Health Risk Assessment guidance (Office of Environmental Health Hazard Assessment, February 2015, Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments, https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf)
a. Construction phasing is based on the preliminary information provided by the City of Mountain View. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast Air Quality Management District of construction equipment and phasing for comparable projects.
b. Chronic Hazard is derived by dividing the pollutant (DPM; PM_{10} Exhaust) maximum annual average concentration by 5; however, the maximum annual average $PM_{2.5}$ concentration shown in this table reflects $PM_{2.5}$ Total ($PM_{2.5}$ Exhaust and $PM_{2.5}$ Dust).

Cancer risk for the residential maximally exposed resident (MER) from project-related construction emissions was calculated to be approximately 70 in one million, which would exceed the 10-in-one-million significance threshold. Cancer risk for the worker and K-12 student receptors were calculated to be approximately 1 and 8 in one million, respectively, which would not exceed the 10-in-one-million significance threshold. In accordance with the latest (2015) OEHHA guidance, the calculated total cancer risk conservatively assumes that the residential MER consists of a pregnant woman in the third trimester that subsequently gives birth to an infant during the duration of construction; therefore, all calculated residential risk values were multiplied by a factor of 10. In addition, it was conservatively assumed that the residents were outdoors 8 hours a day, 261 construction days per year and exposed to all of the daily construction emissions.

For non-carcinogenic effects, the chronic hazard index identified for each toxicological endpoint equaled less than one for each identified receptor. Therefore, chronic non-carcinogenic hazards are within acceptable limits. For all receptors, the maximum annual $PM_{2.5}$ concentration would not exceed the Air District significance threshold.

As described above, prior to mitigation, cancer risk at the Residential MER would be potentially **significant** because the project would expose sensitive receptors to substantial concentrations of air pollutant emissions during construction.

Impact AIR-2: Construction activities for the proposed project could generate cancer risks above acceptable levels for the maximally exposed residential receptor.

Mitigation Measure AIR-2: The City of Mountain View shall specify in the construction bid that the project construction contractor(s) and subcontractor(s) comply with the following requirements for all off-road equipment used over the entire duration of the construction activities at the site:

- Use engines that meet either US EPA or California Air Resources Board (CARB) Tier 4 Final emission standards for engines that are greater than 25 horsepower. Ensure that all construction plans submitted to the City of Mountain View Building Division clearly show the selected emission reduction strategy for construction equipment over 25 horsepower.
- If Tier 4 Final equipment is not available for use for the project for a specific piece of off-road construction equipment, documentation shall be provided to the City of Mountain View demonstrating that such equipment is not available for the project. If Tier 4 Final equipment is not available, the construction contractor(s) and subcontractor(s) affected shall use Tier 4 Interim equipment instead. If Tier 4 Interim equipment is not available for use for the project for a specific piece of off-road construction equipment, documentation shall be provided to the City demonstrating that such equipment is not available for the project. If Tier 4 Interim equipment is not available, the construction contractor(s) and subcontractor(s) affected shall use Tier 3 equipment outfitted with a level 3 diesel particulate filter instead.
- Prohibit the use of generators except for electric alternatives. The City shall ensure that all construction plans submitted to the City of Mountain View Building Division clearly show the requirement to use power storage equipment or electric generators in lieu of fossil fuel powered generators.
- Maintain a list of all operating equipment in use on the project site for verification by the City or their designee. The construction equipment list shall state the makes, models, fuel type, and number of construction equipment on-site. All equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations.
- Communicate with all sub-contractors in contracts and construction documents that all non-essential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board Rule 2449 and is responsible for ensuring that this requirement is met.

Significance with Mitigation: Less than significant**.** As shown in Table 4.1-7, *Construction Health Risk Assessment Result – Mitigated,* implementation of Mitigation Measure AIR-2 would reduce

4.1 Air Quality

DPM concentrations at nearby receptors to the extent that the Residential MER, the receptor type that would experience the greatest pollutant concentration and associated cancer risk, would not be exposed to pollutant concentrations which lead to a significant health impact. As such, implementation of Mitigation Measure AIR-2 would reduce impacts to sensitive receptors to a less-than-significant level.

Table 4.1-7 Construction Health Risk Assessment Results – Mitigated

	Project Level Risk		
Receptor	**Cancer Risk (per million)**	**Chronic Hazards**	**Maximum Annual Average PM2.5 Concentration (µg/m3)**
MER – Resident	8	<0.1	<0.1
Air District Threshold	**10**	**1.0**	**0.3**
Exceeds Threshold?	**No**	**No**	**No**

Note: Cancer risk calculated using 2015 OEHHA HRA Guidance Manual.
Risks incorporate Mitigation Measure AIR-1, which requires the use of construction equipment which meets USEPA Tier 4 Final engine requirements for equipment over 25 horsepower and prohibits fossil fuel powered generators.

Localized Long-Term Operational Impacts

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the State's one-hour standard of 20 ppm or the eight-hour standard of 9.0 ppm. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for periods of time and are subject to reduced speeds.

Congestion management plans must align with *Plan Bay Area 2050*, and an overarching goal of this regional plan is to concentrate development in areas where there are existing services and infrastructure. This strategy helps reduce the allocation of new growth in outlying areas where substantial transportation investments would be necessary to achieve the per capita passenger vehicle miles traveled and associated GHG emissions reductions under Senate Bill 375. The proposed project would be an infill redevelopment project and would be consistent with this overarching goal of the MTC/ABAG's Plan Bay Area.

Furthermore, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air mixing is substantially limited (e.g., underpasses, bridges)—or result in a conflict with the local congestion management plan in order to have the potential to generate a CO hotspot.[14] As previously mentioned, the proposed project would not result in a conflict with the local

[14] Bay Area Air District. 2023, April. California Environmental Quality Act Air Quality Guidelines. https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines.

congestion management plan because it would constitute the redevelopment of the existing facility and would not result in new uses that cause an expansion of the already urbanized area. Consistent with the Institute of Transportation Engineers (ITE) 11th Edition Trip Generation Manual Rate 571 (Adult Detention Facility), which was determined to be the most representative of the transportation behavior of both the existing and proposed facility, operation of the proposed project would generate up to 14 AM peak hour vehicle trips and 15 PM peak hour vehicle trips beyond existing conditions. According to the Mountain View General Plan Environmental Impact Report's Figure IV.C-9, *Roadway Volumes and Levels of Service (2030)*,[15] the two analyzed roadways nearest to the project site include Central Expressway with 30,000 daily vehicles and South Shoreline Boulevard with 53,400 daily vehicles forecasted for 2030. Dividing these daily vehicle trip volumes by 10, as an industry standard to approximate the peak hour volumes, results in an estimated 3,000 peak hour trips along Central Expressway and 5,340 peak hour trips along South Shoreline Boulevard. Therefore, the addition of up to 15 peak hour trips resulting from the proposed project would not cause nearby transportation facilities (e.g., roadway segments or intersections) to exceed the Air District's screening thresholds and would therefore not result in generating a potential CO hotspot. Therefore, impacts from CO hotspots are considered **less than significant**.

c) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Construction-Related Odors

During construction of the proposed project, construction equipment exhaust and application of asphalt and architectural coatings would temporarily generate odors. Any construction-related odor emissions would be temporary and intermittent. Additionally, noxious odors would be confined to the immediate vicinity of the construction equipment. By the time such emissions reach any sensitive receptor sites, they would be diluted to well below any level of air quality concern, and impacts would be **less than significant**.

Operational-Related Odors

The proposed project could result in the generation of outdoor odors capable of affecting off-site receptors such as landscaping equipment exhaust, garbage collection, and vehicle exhaust. However, the proposed project is not considered a land use type that is a typical generator of odor that could affect a substantial number of people, such as a landfill or industrial process facility. In addition, by the time such emissions reach any off-site receptors, they would be diluted to well below any level of air quality concern and would not be concentrated such that a substantial number of off-site receptors would be affected.

[15] Mountain View, City of. 2011. General Plan Environmental Impact Report. https://www.mountainview.gov/home/showpublisheddocument/2264/637957226857900000.

Furthermore, nuisance odors are regulated under Air District Regulation 7, Odorous Substances, which requires abatement of any nuisance generating an odor complaint. In addition, odors are also regulated under Air District Regulation 1, Rule 1-301, *Public Nuisance*. Compliance with Air District Regulation 7 would ensure that odor impacts associated with the proposed project are minimized to a **less-than significant** level.

Significance without Mitigation: Less than significant.

4.1.5 Cumulative Impact Analysis

The cumulative area of analysis is the SFBAAB. Similar to GHG emissions impacts, air quality impacts are regional in nature as no single project generates enough emissions that would cause an air basin to be designated as a nonattainment area. Therefore, the impacts previously discussed are evaluated in the cumulative context.

As discussed in impact discussion (a), ground disturbing activities would generate PM_{10} and $PM_{2.5}$; however, Mitigation Measure AIR-1 would ensure that the project implements the Air District's dust control BMPs which would reduce fugitive dust emissions to a less-than-significant level. Additionally, criteria air pollutants from construction equipment exhaust would not exceed the Air District average daily thresholds. The project's operational emissions would also not exceed the Air District's recommended operational criteria air pollutant emissions thresholds. Consequently, the proposed project would not cumulatively contribute to the nonattainment designations of the Air Basin and impacts would be less than significant.

The proposed project would also elevate concentrations of TACs in the vicinity of sensitive receptors during the construction activities, however, Mitigation Measure AIR-2, which would require the use of Tier 4 Final equipment and prohibit the use of fossil fuel powered generators during construction, would reduce cancer health risk for the affected sensitive receptors to below the Air District health risk thresholds. Additionally, as discussed in impact discussion (b), the proposed project's contribution of 15 additional peak hour trips would not cause nearby transportation facilities (e.g., roadway segments or intersections) to exceed the Air District's screening thresholds and would therefore not result in generating a potential CO hotspot. Cumulative localized health risk impacts would therefore be **less than significant**.

4.2 BIOLOGICAL RESOURCES

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for implementation of the proposed project to impact biological resources. As described in Chapter 2, *Introduction*, of this Draft EIR, the only significance criteria identified in the California Environmental Quality Act (CEQA) Guidelines that are evaluated in this chapter include potential impacts to sensitive species and the potential to conflict with local policies protecting biological resources. Therefore, this chapter only addresses these two issues.

4.2.1 Regulatory Background

FEDERAL AND STATE

State and federal agencies have a lead role in the protection of biological resources under their permit authority set forth in statues and regulations. The United States Fish and Wildlife Service (USFWS) is responsible for administering the Migratory Bird Treaty Act (MBTA) and the federal Endangered Species Act (ESA).

At the State level, the California Department of Fish and Wildlife (CDFW) is responsible for administration of the California Endangered Species Act (CESA). Sections 3500-3516, 4700, 5050, and 5515 of the California Fish and Game Code (CFGC) address Fully Protected species.

Special-status species are plants and animals that are legally protected under the ESA/CESA or other laws and regulations, and also include other species considered rare enough by the scientific community and trustee agencies to warrant special consideration, particularly with regard to protection of isolated populations, nesting or denning locations, communal roosts, and other essential habitat. Species with legal protection under the ESA/CESA may present major constraints to development, particularly when they are wide-ranging or highly sensitive to habitat disturbance and where proposed development would result in a "take" of these species. “Take” is a term used in the ESA to include, "harass, harm, pursue, hunt, shoot, wound, kill trap, capture, or collect, or to attempt to engage in any such conduct."[1]

Protecting habitat on an ecosystem-level is increasingly recognized as vital to the protection of natural diversity in the State. A project would normally be considered to have a significant effect on the environment if it would substantially affect a sensitive natural community, such as a riparian woodland, native grassland, or coastal salt marsh. Further loss of a sensitive natural community could also be interpreted as substantially diminishing habitat, depending on the relative abundance, quality and degree of past disturbance, and the anticipated impacts.

[1] United Stated Fish & Wildlife Services Endangered Species Act 40 Years of Conserving Endangered Species, https://www.fws.gov/endangered/esa-library/pdf/ESA_basics.pdf.

4.2 Biological Resources

LOCAL

Mountain View 2030 General Plan

The Mountain View 2030 General Plan includes goals and policies relevant to biological resources in the Infrastructure and Conservation Element, and the Parks, Open Space and Community Facilities Element. The policies relevant to the proposed project are described in Section 4.2.4, *Project Impact Analysis*, of this chapter.

Mountain View Municipal Code

The City of Mountain View Municipal Code contains all ordinances for the city. The Municipal Code is organized by Chapter, Article, and Section.

Chapter 36, *Zoning*, Article XI, *Landscaping*, Division 2, *General Landscaping Regulations*, sets forth the standards for landscaping in the city. Section 36.34.10, *General Landscaping Standards*, which amongst other things, describes the standards for plant size, spacing, parking lot landscaping, and drought-tolerant and/or native species. Section 36.34.20, *Installation of Required Landscaping*, sets forth the standards for the inspection of required landscaping. Section 36.34.25, *Removal of Trees*, states that the removal of healthy trees of any size is discouraged and that "Heritage trees," as defined, shall be retained to the extent possible. The removal of a Heritage tree shall be done in compliance with the permit application and review provisions of Chapter 32, *Trees, Shrubs and Plants*, Article II, *Protection of the Urban Forest*.

Chapter 32, *Trees, Shrubs and Plants,* Article II, *Protection of The Urban Forest*, establishes regulations related to tree protection in the city. Section 32.23, *Definitions*, defines a heritage tree as any one of the following:

- A tree which has a trunk with a circumference of forty-eight (48) inches or more measured at fifty-four (54) inches above natural grade;
- A multi-branched tree which has major branches below fifty-four (54) inches above the natural grade with a circumference of forty-eight (48) inches measured just below the first major trunk fork.
- Any quercus (oak), sequoia (redwood), or cedrus (cedar) tree with a circumference of twelve (12) inches or more when measured at fifty-four (54) inches above natural grade;
- A tree or grove of trees designated by resolution of the city council to be of special historical value or of significant community benefit.

Section 32.25, *Heritage Tree Preservation*, enacts regulations for heritage tree preservation, and Section 32.28, *Application for Removal Permit; Term of Permit,* outlines the permits that are required to remove a heritage tree and the application process. Section 32.35, *Criteria for Removal; Conditions; Findings*, describes the criteria and conditions of approval for the removal of heritage trees and states that the decision-maker shall consider additional criteria, if

applicable, in weighing the decision to remove a heritage tree, with an emphasis on the intent to preserve heritage trees. Section 32.35(d) describes the potential for any replacement trees to be placed off-site or that an applicant be permitted to pay a fee in lieu of replacement.

4.2.2 Existing Conditions

Habitat

The project site and surrounding area have been urbanized and now support roadways, structures, other impervious surfaces, areas of turf, and ornamental landscaping. Remnant native trees are scattered throughout the urbanized area, together with non-native trees, shrubs, and groundcovers. The site is currently occupied by the Mountain View Police Services - Fire Administration building, associated surface parking, a pump station, and a K-9 training area that is currently operating. The project site is bound by roadways on all sides and property, and land beyond the roadways is developed with residential, commercial uses, and educational land uses. Pursuant to the Mountain View General Plan EIR, the site is classified as a developed area.[2] The CALVEG habitat mapping program describes urban areas as lands that tend to have low to poor wildlife habitat value due to replacement of natural communities, fragmentation of remaining open space areas and parks, and intensive human disturbance.[3]

Wildlife and Plants

The diversity of urban wildlife depends on the extent and type of landscaping and remaining open space, as well as the proximity to natural habitat. Trees and shrubs used for landscaping provide nest sites and cover for wildlife adapted to developed areas. Typical native bird species include the mourning dove, scrub jay, northern mockingbird, American robin, brown towhee, American crow, and Anna's hummingbird, among others. Introduced species include the rock dove, European starling, house finch, and house sparrow. Urban areas can also provide habitat for several species of native mammals such as the California ground squirrel and striped skunk, as well as the introduced eastern fox squirrel and eastern red fox. Introduced pest species such as the Norway rat, house mouse, and opossum are also abundant in developed areas. Numerous bat species are also known to be in the Mountain View area, most of which are relatively common and are not considered special-status species.

Given the urbanized and built-out nature of the site and the surrounding area, there is no essential habitat for special-status species on the site. However, there is a possibility that birds, including special-status birds, could nest in trees and other landscaping on the project site. The

[2] City of Mountain View, 2012, Draft 2030 General Plan and Greenhouse Gas Reduction Program EIR, IV. Setting, Impacts, and Mitigation Measures, J. Biological Resources, page 410.
[3] The CALVEG system was initiated in January 1978 by the Region 5 Ecology Group of the US Forest Service to classify California's existing vegetation communities for use in statewide resource planning. CALVEG maps use a hierarchical classification on the following categories: forest; woodland; chaparral; shrubs; and herbaceous.

4.2 Biological Resources

nests of most bird species are protected under the MBTA when in active use, and there is a remote possibility that one or more raptor species protected under the MBTA and CFGC could nest on the project site. Bat species are also known to be in the Mountain View area, most of which are relatively common and are not considered special-status species. These species have no legal protected status under the ESA or CESA, but the Pallid bat and Western red bat are considered a Species of Special Concern by the CDFW. Bat species found in the Mountain View vicinity may forage and occasionally roost in the site vicinity, but because the buildings on the site are occupied, no suitable habitat for maternity roosts are on the site.

Protected Trees

A tree inventory was prepared for the proposed project by Woodreeve Consulting, LLC to assess the health and structural conditions of the trees on the project site, identify all "protected trees" as defined by Mountain View Municipal Code Chapter 32, *Trees, Shrubs and Plants,* described in the regulatory setting, assess the impacts of constructing the proposed project on the trees, and present guidelines for tree preservation.[4] The Tree Report evaluated 105 trees, representing 17 species on the site. These trees represent the following species: Blackwood acacia (*Acacia melanoxylon),* Italian alder *(Alnus cordata),* Raywood ash *(Fraxinus oxycarpa 'Raywood'),* Evergreen ash *(Fraxinus uhdei),* Honey locust *(Gleditsia triacanthos f. inermis),* Sweetgum *(Liquidambar styraciflua),* Olive *(Olea europaea),* Chinese Pistache *(Pistacia chinensis),* London plane *(Platanus x hispanica),* Purple-leaf plum *(Prunus cerasifera 'Atropurpurea'), Flowering cherry (Prunus serrulate),* Callery pear *(Pyrus calleryana),* Evergreen pear *(Pyrus kawakamii),* Coast live oak (*Quercus agrifolia*), Valley oak (*Quercus lobata), Coast redwood (Sequoia sempervirens),* and Xylosma *(Xylosma congestum).*

The project site includes trees that are concentrated around the perimeter of the site, with a group of 48 trees (almost half the total) located south of the existing building along Villa Street.

The professional arborist evaluated the health and structural condition of the 105 trees on the project site, applying a scale of 1 to 5, with 1 being the poorest condition and 5 being excellent condition. These are defined as follows:

- 5 = Excellent health and vitality. Good form and structure. No insect or disease problems of significance.
- 4 = Good health and vitality. Minor dieback and/or decline in vigor. Insignificant structural defects or insects/disease issues that can be corrected.

[4]Woodreeve Consulting, May 2022, Draft Tree Inventory Report Public Safety Headquarters, Mountain View, CA.

- 3 = Moderate health and vitality. Moderate twig and branch dieback or chlorotic foliage. Fair structure, limited decay and/or insects/disease issues that would require a concerted effort to correct.
- 2 = Poor health and vitality. Declining tree with extensive dieback or very thin crown. Significant decay and/or structural defects that cannot be corrected.
- 1 = Very poor health and vitality. Tree is mostly dead or has extensive structural defects that cannot be corrected.

The northern portion of the site was a typical parking lot, with exotic species located around the perimeter and in parking lot islands. The southern portion of the site, in front of the existing building, was more park like, with a generous planting of coast redwood, sweetgum and flowering cherries.

Trees were generally in good (46 percent of the population) to fair (42 percent) condition. Tree condition at the site was directly related to the amount of growing space provided. Coast redwoods were well represented, with 31 trees, or almost 30 percent, of the population.

A total of 60 *Heritage* trees assessed on the site, including 31 coast redwoods, 6 coast live oaks, valley oak #251 and 22 exotic species.

4.2.3 Significance Criteria

The Initial Study prepared for this Draft EIR (see Appendix A, *Notice of Preparation, Initial Study, and Scoping Comments*) identified that the proposed project would not result in a significant impact for the following significance criteria:

- Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

4.2 Biological Resources

The proposed project would have a significant impact under Appendix G, *Environmental Checklist Form*, of the California Environmental Quality Act (CEQA) Guidelines if it would:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

b) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

4.2.4 Project Impact Analysis

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts.

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Nesting Birds

As stated above in the existing conditions discussion, there are no known occurrences of special-status plant or animal species and no suitable habitat for such species on the project site, but there is a possibility that birds that are protected by the MBTA and CFGC could nest in trees and other landscaping on the project site. However, no essential habitat for these or other special-status species is present on the site due to its developed condition. Without mitigation, this impact is considered **significant**.

Impact BIO-1: Tree removal and demolition activities during site clearance could destroy active nests, and/or otherwise interfere with nesting of birds protected under federal and State law.

Mitigation Measure BIO-1: Nests of raptors and other birds shall be protected when in active use, as required by the federal Migratory Bird Treaty Act and the California Fish and Game Code. The construction contractor shall indicate the following on all construction plans, if construction activities and any required tree removal occur during the breeding season (February 1 and August 31). Preconstruction surveys shall:

- Be conducted by a qualified biologist prior to tree removal or grading, demolition, or construction activities. Note that preconstruction surveys are not required for tree removal or construction, grading, or demolition activities outside the nesting period.

- Be conducted no more than 14 days prior to the start of tree removal or construction.
- Be repeated at 14-day intervals until construction has been initiated in the area after which surveys can be stopped.
- Document locations of active nests containing viable eggs or young birds.

Protective measures for active nests containing viable eggs or young birds shall be implemented under the direction of the qualified biologist until the nests no longer contain eggs or young birds. Protective measures shall include:

- Establishment of clearly delineated exclusion zones (i.e., demarcated by identifiable fencing, such as orange construction fencing or equivalent) around each nest location as determined by the qualified biologist, taking into account the species of birds nesting, their tolerance for disturbance and proximity to existing development. In general, exclusion zones shall be a minimum of 300 feet for raptors and 75 feet for passerines and other birds.
- Monitoring active nests within an exclusion zone on a weekly basis throughout the nesting season to identify signs of disturbance and confirm nesting status.
- An increase in the radius of an exclusion zone by the qualified biologist if project activities are determined to be adversely affecting the nesting birds. Exclusion zones may be reduced by the qualified biologist only in consultation with California Department of Fish and Wildlife.
- The protection measures shall remain in effect until the young have left the nest and are foraging independently or the nest is no longer active.

Significance with Mitigation: Less than significant.

Roosting Bats

As described in the existing conditions, there are bat species are also known to be in the Mountain View area, most of which are relatively common and are not considered special-status species. Bat species found in the Mountain View vicinity may forage and occasionally roost in the site vicinity, but suitable habitat conditions for maternity roots is absent from the site. The potential for any special-status bat species to be present on the site is considered highly remote, given the urbanization of the site vicinity and intensity of human activity, which typically discourages possible occupation by special-status bats. Accordingly, the construction

and operation of the proposed project would not result in the inadvertent loss of any bats and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

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

General Plan

As described below, the proposed project would not conflict with any goals and policies in the General Plan related to the protection of biological resources that are relevant to the proposed project:

- **Policy INC 16.3** requires the protection and enhancement of nesting, foraging, and other habitat for special-status species and other wildlife. While the proposed project would be located in an infill, urban area, which does not contain any sensitive habitat of special concern, there is the potential for birds, including special-status birds, to nest in the on-site trees. The proposed project would include new landscaping including trees, shrubs, and groundcover as part of the on-site bioretention areas which would enhance urban ecosystem while also providing stormwater treatment that is beneficial to wildlife.
- **Policy INC 16.4** requires the containment and reduction of the amount of invasive species. The proposed landscaping would be in compliance with the Mountain View Municipal Code Chapter 36, *Zoning*, Article XI, *Landscaping*, Division 2, *General Landscaping Regulations*, which amongst other things, requires landscape design and construction to include drought-tolerant and/or native species in Section 36.34.10(f), *General Landscaping Standards*).
- **Policy INC 16.6** requires the integration of biological resources, such as green roofs and native landscaping, into the built environment. The proposed project would include new trees, plants, shrubs, and groundcover with drought tolerant and native species as part of the overall landscaping and on-site bioretention areas.
- **Policy POS 12.1** requires the protection of trees as an ecological and biological resource. The proposed project would remove some trees, including trees that qualify as “heritage” trees pursuant to Municipal Code Chapter 32, *Trees, Shrubs and Plants.* The project applicant would comply with the permit requirements for the removal of heritage trees pursuant to Municipal Code Section 32.28, *Application for Removal Permit; Term of Permit.* Additionally, the proposed project would include new trees, plants, shrubs, and groundcover with drought tolerant and native species as part of the overall landscaping and on-site bioretention areas.

- **Policy POS 12.2** requires increasing the tree canopy coverage to expand shaded areas, enhance aesthetics and help reduce greenhouse gases. The proposed project would remove some trees and shrubs as part of the new development, but would include new trees, plants, shrubs, and groundcover with drought tolerant and native species as part of the overall landscaping and on-site bioretention areas.
- **Policy POS 12.4** requires increasing water-efficient, drought-tolerant and native landscaping where appropriate on public and private property. The proposed landscaping would be in compliance with the Mountain View Municipal Code Chapter 36, *Zoning*, Article XI, *Landscaping*, Division 2, *General Landscaping Regulations*, which amongst other things, requires landscape design and construction to include drought-tolerant and/or native species in Section 36.34.10(f), *General Landscaping Standards*).

Municipal Code

Municipal Code, Chapter 32, *Trees, Shrubs and Plants,* Article II, *Protection of The Urban Forest*, provides regulations for the protection, preservation, and maintenance of trees of certain species and sizes. The proposed project includes the removal of trees that meet the City's requirements for qualifying as "heritage" trees. Removal of a protected tree is permitted by the City, with approval of a tree removal permit. In some circumstances, the City requires tree management plans and tree replacement. The removal of trees protected under the City's Municipal Code is considered a **significant** impact.

Impact BIO-2: The proposed development would result in removal of trees protected under City's Municipal Code.

> **Mitigation Measure BIO-2:** The proposed project shall comply with the City of Mountain View's Municipal Code requirements for the provision of the removal of heritage trees in Chapter 32, Trees, Shrubs and Plants, Article II, Protection of The Urban Forest. A tree removal permit shall be obtained for the removal of any "heritage" tree, and replacement plantings shall be provided as approved by the City. If permitted, any replacement trees be placed off-site or an appropriate in-lieu tree replacement fee may be paid to the City of Mountain View as compensation for "heritage" trees removed by the proposed project, where sufficient land area is not available on-site for adequate replacement and when approved by the City.
>
> In addition, a Tree Protection and Replacement Program (Program) shall be developed by a Certified Arborist prior to project approval and implemented during project construction to provide for adequate protection and replacement of "heritage" trees, as defined by the City's Municipal Code. The Program shall include, but is not limited to, the following provisions:

4.2 Biological Resources

- Adequate measures shall be defined to protect all trees to be preserved. These measures should include the establishment of a tree protection zone (TPZ) around each tree to be preserved, in which no disturbance is permitted. For design purposes, the TPZ shall be located at the dripline of the tree or 10 feet, whichever is greater. If necessary, the TPZ for construction-tolerant species (i.e., coast live oaks) may be reduced to 7 feet.

- Temporary construction fencing shall be installed at the perimeter of TPZs prior to demolition, grubbing, or grading. Fences shall be 6-foot chain link or equivalent, as approved by the City of Mountain View. Fences shall remain until all construction is completed. Fences shall not be relocated or removed without permission from the consulting arborist.

- No grading, excavation, or storage of materials shall be permitted within TPZs. Construction trailers, traffic, and storage areas shall remain outside fenced areas at all times. No excess soil, chemicals, debris, equipment, or other materials shall be dumped or stored within the TPZ.

- Underground services including utilities, sub-drains, water or sewer shall be routed around the TPZ. Where encroachment cannot be avoided, special construction techniques such as hand digging or tunneling under roots shall be employed where necessary to minimize root injury. Irrigation systems must be designed so that no trenching will occur within the TPZ.

- Construction activities associated with structures and underground features to be removed within the TPZ shall use the smallest equipment and operate from outside the TPZ. The consulting arborist shall be on-site during all operations within the TPZ to monitor demolition activity.

- All grading, improvement plans, and construction plans shall clearly indicate trees proposed to be removed, altered, or otherwise affected by development construction. The tree information on grading and development plans should indicate the number, size, species, assigned tree number, and location of the dripline of all trees that are to be retained/preserved. All plans shall also include tree preservation guidelines prepared by the consulting arborist.

- The demolition contractor shall meet with the consulting arborist before beginning work to discuss work procedures and tree protection. Prior to beginning work, the contractor(s) working in the vicinity of trees to be preserved shall be required to meet with the consulting arborist at the site to review all work procedures, access routes, storage areas, and tree protection measures.

- All contractors shall conduct operations in a manner that will prevent damage to trees to be preserved. Any grading, construction, demolition or other work that is expected to encounter tree roots shall be monitored by the consulting arborist. If injury should occur to any tree during construction, it should be evaluated as soon as possible by the consulting arborist so that appropriate treatments can be applied.

- Any plan changes affecting trees shall be reviewed by the consulting arborist with regard to tree impacts. These include, but are not limited to, site improvement plans, utility and drainage plans, grading plans, landscape and irrigation plans, and demolition plans.

- Trees to be preserved may require pruning to provide construction clearance. All pruning shall be completed by a State of California Licensed Tree Contractor (C61/D49). All pruning shall be done by Certified Arborist or Certified Tree Worker in accordance with the current Best Management Practices for Pruning published by the International Society of Arboriculture, and adhere to the current editions of the American National Standard for Tree Care Operations (Section Z133.1) and Pruning (Section A300).

- Any root pruning required for construction purposes shall receive the prior approval of and be supervised by the consulting arborist.

- Any demolition or excavation, such as grading, pad preparation, excavation, and trenching, within the dripline or other work that is expected to encounter tree roots should be approved and monitored by the consulting arborist. Any root pruning required for construction purposes shall receive prior approval of, and by supervised by, the consulting arborist. Roots shall be cut by manually digging a trench and cutting exposed roots with a sharp saw.

- Tree(s) to be removed that have branches extending into the canopy of tree(s) to remain must be removed by a qualified arborist and not by construction contractors. The qualified arborist shall remove the tree in a manner that causes no damage to the tree(s) and understory to remain. Tree stumps shall be ground 12 inches below ground surface.

- All tree work shall comply with the Migratory Bird Treaty Act as well as California Fish and Game Code Sections 3503 through 3513 to not disturb nesting birds. To the extent feasible, tree pruning, and removal shall be scheduled outside of the breeding season. Breeding bird surveys shall be conducted prior to tree work. Qualified biologists shall be involved in establishing work buffers for active nests. (See Mitigation Measure BIO-1.)

4.2 Biological Resources

- The vertical and horizontal locations of all the trees identified for preservation shall be established and plotted on all plans. These plans shall be forwards to the consulting arborist for review and comment.
- Foundations, footings, and pavements on expansive soils near trees shall be designed to withstand differential displacement to protect the soil surrounding the tree roots.
- Any liming within 50 feet of any tree shall be prohibited, as lime is toxic to tree roots. Any herbicides placed under paving materials shall be safe for use under trees and labeled for that use.
- Brush from pruning and trees removal operations shall be chipped and spread beneath the trees within the TPZ. Mulch shall be between 2 inches and 4 inches in depth and kept at a minimum of 3 feet from the base of the trees.
- All recommendations for tree preservation made by the applicant's consulting arborist shall be followed.

Significance with Mitigation: Less than significant.

4.2.5 Cumulative Impact Analysis

The geographic scope of the cumulative analysis for biological resources considers the surrounding incorporated and unincorporated lands, and the region. The potential impacts of proposed development on biological resources tend to be site-specific, and the overall cumulative effect would be dependent on the degree to which significant vegetation and wildlife resources are protected on a particular site. At the same time, cumulative development can contribute incrementally to regionwide impacts, such as reductions in the amount of existing wildlife habitat, particularly for birds and larger mammals. Any cumulative development projects within the vicinity of the project are located in urbanized areas and contain limited biological resource value. Redevelopment and infill projects, including those in built-out urban areas, would remove vegetation that could be used for nesting by birds protected under various laws and would remove buildings and trees that could be used for roosting by sensitive bat species. However, these development projects would be required to comply with the federal Migratory Bird Treaty Act and the CFGC, which require pre-construction surveys and protective measures for active nests. Furthermore, cumulative projects would be required to obtain a tree removal permit and adhere to the tree removal requirements for protected trees under City's Municipal Code.

The project site is previously disturbed, is developed for the same uses as the proposed project use, and is located within an urban area; therefore, it does not serve as a wildlife corridor.

Potential impacts to nesting birds and the removal of protected trees would be mitigated to less-than-significant levels through the implementation of Mitigation Measure BIO-1 and BIO-2, respectively. Given the relatively low natural resource quality of the project site and the project's mitigation of on-site impacts to less-than-significant levels, the proposed project would result in a **less-than-significant** cumulative impact on biological resources.

Significance with Mitigation: Less than significant.

4.2 Biological Resources

This page is intentionally left blank.

4.3 CULTURAL AND TRIBAL CULTURAL RESOURCES

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for implementation of the Mountain View Public Safety Building to impact cultural resources. Cultural resources comprise archaeological and historical resources. Archaeology studies human artifacts, such as places, objects, and settlements that reflect group or individual religious, cultural, or everyday activities. Historical resources include sites, structures, objects, or places that are at least 50 years old and are significant for their engineering, architecture, cultural use or association, etc. In California, historic resources cover human activities over the past 12,000 years. Cultural resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. The analysis in this section is based in part on the following information:

> *Historic Resources Evaluation Mountain View Police Services – Fire Administration Building Mountain View California,* Forget Me Not History, May 2023.

A complete copy of this study is provided in Appendix C, *Historic Resources Evaluation*, of this Draft EIR.

4.3.1 Regulatory Background

FEDERAL

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The act authorized the National Register of Historic Places, which lists districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 regulates the protection of archaeological resources and sites on federal and Indian lands.

Native American Graves Protection and Repatriation Act

NAGPRA is a federal law passed in 1990 that mandates museums and federal agencies to return certain Native American cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants or culturally affiliated Indian tribes.

4.3 Cultural and Tribal Cultural Resources

STATE

California Public Resources Code

Archaeological, paleontological, and historical sites are protected under a wide variety of State policies and regulations in the California Public Resources Code (PRC). In addition, cultural and paleontological resources are recognized as nonrenewable resources and receive protection under the PRC and California Environmental Quality Act (CEQA).

PRC Sections 5020 to 5029.5 continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the California Register of Historical Resources and is responsible for designating State Historical Landmarks and Historical Points of Interest.

PRC Sections 5079 to 5079.65 define the functions and duties of the Office of Historic Preservation (OHP), which administers federal- and State-mandated historic preservation programs in California as well as the California Heritage Fund.

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites; identify the powers and duties of the Native American Heritage Commission (NAHC); require that descendants be notified when Native American human remains are discovered; and provide for treatment and disposition of human remains and associated grave goods.

California Register of Historic Resources

The California Register of Historic Resources (California Register) establishes a list of properties to be protected from substantial adverse change (Public Resources Code Section 5024.1). The State Office of Historic Preservation (OHP) has determined that buildings, structures, and objects 45 years or older may be of historical value. A historical resource may be listed in the California Register if it meets any of the following criteria.

- It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- It is associated with the lives of persons important in California's past.
- It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic value.
- It has yielded or is likely to yield information important in prehistory or history.

4.3 Cultural and Tribal Cultural Resources

The California Register includes properties that are listed or have been formally determined eligible for listing in the National Register, State Historical Landmarks, and eligible Points of Historical Interest. Other resources that may be eligible for the California Register, and which require nomination and approval for listing by the State Historic Resources Commission, include resources contributing to the significance of a local historic district, individual historical resources, historical resources identified in historic surveys conducted in accordance with OHP procedures, historic resources or districts designated under a local ordinance consistent with the procedures of the State Historic Resources Commission, and local landmarks or historic properties designated under local ordinance.

California Health and Safety Code

California Health and Safety Code Section 7050.5 requires that in the event that human remains are discovered within the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC.

State Laws Pertaining to Human Remains

Any human remains encountered during ground-disturbing activities are required to be treated in accordance with California Code of Regulations Section 15064.5(e) (CEQA), PRC Section 5097.98, and the California Health and Safety Code Section 7050.5. California law protects Native American burials, skeletal remains, and associated grave goods regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Specifically, Section 7050.5 of the California Health and Safety Code states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are determined to be of Native American origin, the county coroner must contact the California NAHC within 24 hours of this identification. An NAHC representative will then identify a Native American Most Likely Descendant to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods. In addition, CEQA Guidelines Section 15064.5 specifies the procedures to be followed in case of the discovery of human remains on non-federal land. The disposition of Native American burials falls within the jurisdiction of the NAHC.

4.3 Cultural and Tribal Cultural Resources

Assembly Bill 52

AB 52 took effect July 1, 2015, and requires inclusion of a new section in CEQA documents titled Tribal Cultural Resources, which include heritage sites. Under AB 52, a tribal cultural resource is defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources. Or the lead agency, supported by substantial evidence, chooses at its discretion to treat the resource as a tribal cultural resource.

AB 52 requires consultation with tribes at an early stage to determine whether the project would have an adverse impact on TCRs and define mitigation to protect them. Per AB 52, within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested it. The tribe then has 30 days of receiving the notification to respond if it wishes to engage in consultation. The lead agency must initiate consultation within 30 days of receiving the request from the tribe. Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a tribal cultural resource, or a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached. Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on tribal cultural resources and discuss feasible alternatives or mitigation that avoid or lessen the impact.

LOCAL

Mountain View 2030 General Plan

The Mountain View 2030 General Plan includes goals and policies relevant to cultural resources in Mountain View in the Land Use and Design Element. The policies relevant to the proposed project are listed in Table 4.3-1, *Mountain View 2030 General Plan Policies Relevant to Cultural Resources and the Proposed Project*.

Table 4.3-1 Mountain View 2030 General Plan Policies Relevant to Cultural Resources and the Proposed Project

Policy Number	Policy Text
Chapter 3, Land Use and Design (LUD) Element	
Policy LUD 11.1	*Historical preservation.* Support the preservation and restoration of structures and cultural resources listed in the Mountain View Register of Historic Resources, the California Register of Historic Places or National Register of Historic Places.
Policy LUD 11.2	*Adaptive re-use.* Encourage the adaptive re-use of historic buildings in ways that retain their historical materials and character-defining features.
Policy LUD 11.3:	*Incentives.* Encourage historical preservation through incentives and opportunities.
Policy LUD 11.5	*Archaeological and paleontological site protection.* Require all new development to meet

Table 4.3-1 Mountain View 2030 General Plan Policies Relevant to Cultural Resources and the Proposed Project

Policy Number	Policy Text
	state codes regarding the identification and protection of archaeological and paleontological deposits.
Policy LUD 11.6	*Human remains*. Require all new development to meet state codes regarding the identification and protection of human remains.

Source: City of Mountain View, 2012, *Mountain View 2030 General Plan.*

Mountain View Municipal Code

The Mountain View Municipal Code contains all ordinances for the city. The Municipal Code is organized by Chapter, Article, Division, and Section.

Division 15, *Designation and Preservation of Historic Resources*, establishes regulations related to how a resource is designated and the designation criteria. Section 36.54.70, Designation process for Historic Register, outlines the designation process and each step for a building to be placed on the Historic Register

Mountain View Register of Historic Resources

Last updated in 2022, the Mountain View Register of Historic Resources outlines the buildings in Mountain View that are historically significant. Within the register, there are 42 privately owned properties and 3 City-owned properties. The project site is not included on the list of properties.

This list is currently being updated along with a Citywide Historic Resources Survey being undertaken.

4.3.2 Existing Conditions

ARCHAEOLOGICAL RESOURCES

Tamien-speaking indigenous communities, later known as the Ohlone, lived in villages in what is now Mountain View. A large earthen mound created by the local tribes (near the present-day Monta Loma neighborhood) serves as a ceremonial and cultural center for the area. In 1777, most of the South Bay became part of the lands of Mission Santa Clara de Asis. Indigenous peoples were relocated to Mission Santa Clara and other nearby missions, where disease killed much of the population and traditional culture and autonomy were subverted.[1]

According to the City of Mountain View Draft 2030 General Plan and Greenhouse Gas Reduction Program Final Environmental Impact Report (SCH No. 2011012069), fossiliferous deposits exist

[1] Mountain View Historical Association, https://www.mountainviewhistorical.org/mountain-view-history-timeline/, accessed on January 29, 2025.

in the general area. The City of Mountain View lies on alluvial plains at the southern end of the San Francisco Bay, which consists primarily of Quaternary Period (1,800,000 years B.P. to present) deposits. These Quaternary alluvial deposits were laid down by the Adobe, Permanente, and Steven's creeks exiting the Santa Cruz Mountains south of Mountain View, and estuarine deposits created by these creeks and the San Francisco Bay. Older Pleistocene deposits typically occur as terraces incised by Holocene fluvial drainages. Locally, Late Pleistocene alluvium (126,000 to 10,000 years B.P.) contains invertebrate and extinct vertebrate fossils, many of which are representative of the Rancholabrean land mammal age. Fossils in alluvium of this age include bison, mammoth, ground sloths, saber-toothed cats, dire wolves, horses, cave bears, rodents, birds, reptiles, and amphibians.[2]

PROJECT SITE HISTORY

This section was prepared using information from the Historic Resource Evaluation Report that was prepared in May 2023 by Forget Me Not History (see Appendix C, *Historic Resources Evaluation*).

The Mountain View Police Services - Fire Administration building has not been previously documented and evaluated for listing in the National Register of Historic Places, California Register of Historical Resources, and Mountain View Register of Historic Resources.

From the 1890s to 1920s, the block on which the project site is located was developed with a mix of residential and light industrial properties. For a time, the northern section of the property (abutting the railroad tracks) contained Mrs. S. E. Bubb's grain warehouse and a corral. In 1915, a portion of the project site was a pickle works that expanded over time. By 1943, the entire block of the project site was a pickle and catsup factory. In 1963, the pickle and catsup factory were shut down and the property became vacant.

In 1977 the project site was identified as the location for the future Mountain View Police Services - Fire Administration building and the architecture firm Goodwin B. Steinberg Associates was retained to design the building. Steinberg served as the principal architect and collaborated with a team of architects, including Pete Dalton and Karl Coombs, on the building's design. The new facility, which included the main building, sign and flagpole, landscaping, and parking lots, was dedicated in March 1980. In 1984, several features that had been eliminated from the proposed plans were completed. Based on a review of drawings and plans provided by the City of Mountain View and visual observation during a site visit, the subject property underwent minimal alterations over the next four decades.

[2] City of Mountain View, September 2012, City of Mountain View Draft 2030 General Plan and Greenhouse Gas Reduction Program Final Environmental Impact Report (SCH No. 2011012069), https://www.mountainview.gov/home/showpublisheddocument/2262/637957226851270000, accessed on January 29, 2025.

Goodwin Steinberg's design for the building incorporated many of his signature elements for large-scale buildings. The building is situated at the southeast corner of the parcel within extensive landscaping. The main façade is one story in height and located at grade with a large entry plaza designed to provide an open feeling inviting community involvement. The lower story is partially embedded in the sloped terrain of the site, allowing the majority of the parking to be located to the rear and below grade, thus obscured from view when approaching the main entrance. The site's topography also allows the north façade to expand to two stories in height, with wide expanses of skylights across the main story and day-to-day police and mechanical operations to occur at the lower story.

Prior to his death in 2010, Goodwin Steinberg was elevated to the American Institute of Architects Fellows, the highest honor for exceptional contributions to the architecture field.

TRIBAL CONSULTATION

In compliance with the requirements set forth in AB 52, the City of Mountain View provided formal notification of the proposed project and served an invitation for consultation to the following tribes:

- Amah Mutsun Tribal Band
- Amah Mutsun Tribal Band of Mission San Juan Bautista
- Indian Canyon Mutsun Band of Costanoan
- Muwekma Ohlone Indian Tribe of the SF Bay Area
- North Valley Yokuts Tribe
- Tamien Nation
- The Ohlone Indian Tribe
- Wuksachi Indian Tribe/Eshom Valley Band

These letters were sent based on a contact list provided by the Native American Heritage Commission on November 13, 2023. As of the time of publication of this Draft EIR, none of the contacted tribes responded to the invitation for consultation.

4.3.3 Significance Criteria

CEQA Guidelines Section 15064.5 provides direction on determining significance of impacts to archaeological and historical resources. Generally, a resource shall be considered "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC Section 5024.1):

- Criterion 1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

- Criterion 2. Is associated with the lives of persons important in our past.

4.3 Cultural and Tribal Cultural Resources

- Criterion 3. Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- Criterion 4. Has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in the California Register of Historical Resources, not determined to be eligible for listing, or not included in a local register of historical resources does not preclude a lead agency from determining that it may be a historical resource.

The proposed project would have a significant impact under Appendix G, *Environmental Checklist Form*, of the California Environmental Quality Act (CEQA) Guidelines if it would:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

c) Disturb any human remains, including those interred outside of dedicated cemeteries.

d) 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:

   i) 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

   ii) 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.

4.3.4 Project Impact Analysis

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts.

4.3 Cultural and Tribal Cultural Resources

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

The types of cultural resources that meet the definition of historical resources under CEQA Section 21084.1 generally consist of districts, sites, buildings, structures, and objects that are significant for their traditional, cultural, and/or historical associations. Under CEQA, both prehistoric and historic-period archaeological sites may qualify based on historical associations. As such, the two main historical resources that are subject to impact, and that may be adversely affected by the proposed project, are historical archaeological deposits and historical architectural resources. Impacts to archaeological resources are discussed under impact discussion (b). Therefore, this discussion focuses on potential impacts to architectural resources.

Each criterion is discussed in more depth below based on the Historic Resource Evaluation Report that was prepared in May 2023 by Forget Me Not History and is in Appendix C, *Historic Resources Evaluation*, of this Draft EIR.

Criterion 1 (Events)

By the time the Mountain View Police Services - Fire Administration building was completed in 1980, the block and surrounding neighborhood had already been developed with a mix of residential, commercial, and light industrial buildings for nearly a century. Similarly, the building was the third iteration of Police and Fire Department buildings in the immediate area, including the fire station completed along Franklin Street in 1924, and the police and fire stations constructed at the intersection of Franklin and Villa streets in the early 1950s. Furthermore, the design and construction of the building from 1977 to 1980 was overshadowed by protracted labor negotiations between the City and Police and Fire Departments, culminating with a contentious 39-day strike by the Mountain View Fire Department in mid-1980. As such, the Mountain View Police Services - Fire Administration building did not play a significant role in the history of the Police and Fire Departments and the expansion of municipal facilities in the City of Mountain View in the late twentieth century, and it did not spur new development in the surrounding area. Therefore, the building is recommended as ineligible for listing in the California Register under Criterion 1.

Criterion 2 (People)

A wide array of City of Mountain View staff has worked at the Mountain View Police Services - Fire Administration building since it opened in 1980. None are known to have made significant contributions to local, State, or national history. While Police Chief Robert K. Schatz and Fire Chief Robert B. Burns held key positions in their respective departments when the building was dedicated, their leadership does not rise to a level of significance under this criterion. Thus, the subject property is recommended as ineligible for listing in the California Register under Criterion 2.

4.3 Cultural and Tribal Cultural Resources

Criterion 3 (Design/Construction)

Architect Goodwin Steinberg is recognized as a master architect, and the Mountain View Police Services - Fire Administration building is a representative example of the large-scale civic projects that he designed during his 50-year career with his namesake firm. The building blends Shed architecture, expressed in the soaring multi-directional shed roofs and varied fenestration, with elements of regional Spanish Colonial Revival architecture, including the white-painted slump stone brick walls and clay tile roofing that soften the building's angularity. The prominent clock tower evokes mission-era bell towers. The incorporation of a broad entry plaza, extensive vegetation, and subtle transitions in the site's topography reflect his intent to create an inviting, open building within a campus-like setting. Furthermore, he integrated experimental active and passive solar technology in the building's design, while ultimately not successful, were nationally recognized as critical to addressing the 1970s energy crisis. The building's design would subsequently be featured in Architectural Record. Although it is less than 50 years old, the building meets the threshold for special consideration for listing in the California Register because sufficient time has passed to understand Steinberg's exemplary career and the history and significance of Shed architecture and experimental solar technology of that era. As such, the subject property is recommended as eligible for listing under Criterion 3 as the work of master architect Goodwin Steinberg.

Criterion 4 (Information Potential)

While Criterion 4 is generally applied to archaeological resources, it can be used to identify buildings with significant construction methods and other related physical information. The subject property is recommended as ineligible for listing in the California Register under this criterion because the experimental solar technology was removed from the building in the late 1980s. The majority of the building's construction material, including the concrete slump blocks, fenestration, and clay tile roofing, do not themselves embody important physical information.

Conclusion

Based on the analysis above, the Mountain View Police Services - Fire Administration building is recommended as eligible for listing in the California Register under Criterion 3 as a significant example of the work of master architect Goodwin Steinberg. The period of significance dates to 1980 when the building was completed, and the property retains its integrity despite the removal of the rooftop solar collectors in the late 1980s. As such, the property qualifies as a historical resource under CEQA. Due to the proposed removal of the building, the proposed project would result in a **significant** impact.

Impact CUL-1: The proposed project would remove the historical resource on the project site that is eligible for listing in the California Register under Criterion 3 as a significant example of the work of master architect Goodwin Steinberg.

Mitigation Measure CUL-1.1: The City shall have Historic American Building Survey Level II documentation completed for the Mountain View Police Services - Fire Administration building and its setting. To ensure public access, the City shall submit copies of the documentation to Mountain View Historical Association's History Center and the California Historical Resources Information System Northwest Information Center. This documentation shall include drawings, photographs, and a historical narrative:

- **Drawings:** Existing historic drawings of the historical resource shall be photographed with large-format negatives or photographically reproduced on Mylar. In the absence of existing drawings, full-measured drawings of the building's plan and exterior elevations shall be prepared prior to demolition.

- **Photographs:** Photo-documentation of the historical resource shall be prepared to Historic American Building Survey standards for archival photography, prior to demolition. Historic American Building Survey standards require large-format black-and-white photography, with the original negatives having a minimum size of four inches by five inches. Digital photography, roll film, film packs, and electronic manipulation of images are not acceptable. All film prints, a minimum of four inches by five inches, must be hand-processed according to the manufacturer's specifications and printed on fiber-base, single-weight paper and dried to a full gloss finish. A minimum of 12 photographs shall be taken, detailing the site, building exterior, building interior, and character-defining features. Photographs must be identified and labeled using Historic American Building Survey standards.

- **Historical Overview:** A professional meeting the Secretary of the Interior's Professional Qualification Standards in Architectural History or History shall assemble historical background information relevant to the historical resource.

The City of Mountain View shall verify compliance with this mitigation measure prior to the initiation of any site or building demolition or construction activities.

Mitigation Measure CUL-1.2: The City shall incorporate an exhibit or display of the Mountain View Police Services - Fire Administration building and a description of its historical significance into a publicly accessible portion of the proposed Public Safety Building. The display shall be developed with the assistance of one or more professionals experienced in creating such historical exhibits or displays.

Significance with Mitigation: Significant and unavoidable. Due to the inherent design of the proposed project, implementation of the proposed project would remove the Mountain View Police Services - Fire Administration building. Therefore, impacts would therefore be significant and unavoidable.

4.3 Cultural and Tribal Cultural Resources

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

Archaeological deposits that meet the definition of historical resource under CEQA Section 21084.1 or CEQA Guidelines Section 15064.5 could be present within the project site and could be damaged or destroyed by ground-disturbing construction activities (e.g., site preparation and grading) associated with the proposed project. Should this occur, the ability of the deposits to convey their significance, either as containing information about prehistory or history, or as possessing traditional or cultural significance to Native American or other descendant communities, would be materially impaired.

The project site is not known to contain archeological resources, ethnographic sites, or Native American remains. However, ground-disturbing construction activities (e.g., site preparation, grading, excavation, and trenching for utilities) associated with the proposed project may result in unanticipated discoveries of cultural resources or the damage or destruction of previously undiscovered resources. Therefore, earth-disturbing activities conducted for the proposed project would have the potential to expose previously undiscovered subsurface archaeological resources, and the impact to archaeological resources has potential to be **significant**.

Impact CUL-2: Construction activities for the proposed project have the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15064.5.

> **Mitigation Measure CUL-2:** Project supervisors, contractors, and equipment operators shall participate in an Archaeological Resource Awareness Training, conducted by a Secretary of Interior-qualified archaeologist, to become familiar with the type of artifacts and features that could be encountered during project-related ground disturbing activities, as well as the procedures to follow if archaeological resources are unearthed during construction. If indigenous, prehistoric or historic-period cultural materials are unearthed during ground-disturbing activities, all work within 100 feet of the find shall halt until a qualified archaeologist and Native American representative can assess the significance of the find. The City and a qualified archaeologist, defined as one meeting the U.S. Secretary of the Interior's Professional Qualifications Standards for Archaeology, and a Native American representative shall be immediately informed of the discovery. Prehistoric and indigenous materials might include obsidian and chert-flaked stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil ["midden"] containing heat-affected rocks and artifacts; stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered-stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. If the find is determined to be potentially significant,

the archaeologist, in consultation with the Native American representative, shall develop a treatment plan that could include site avoidance, capping, or data recovery. If avoidance is not feasible, project impacts shall be mitigated in accordance with the recommendations of the archeologist, in coordination with the City, Native American representative, and pursuant to CEQA Guidelines Section 15126.4 (b)(3)(C), which requires implementation of a data recovery plan. Once the recovery plan has been reviewed and approved by the City, implemented, and any appropriate resource recovery completed, project construction activity within the area of the find may resume.

Significance with Mitigation: Less than significant.

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

Previously undiscovered human remains associated with pre-contact archaeological deposits may exist within the project site, as ground-disturbing activities sometimes uncover such previously unrecorded remains. As discussed under impact discussion (b), ground-disturbing activities and excavation for the proposed project would have the potential to uncover buried resources. It is possible that human remains may be present on the project site. Descendant communities may ascribe religious or cultural significance to such remains, making any such disturbances a **significant** impact.

Impact CUL-3: Construction activities for the proposed project have the potential to result in unanticipated discovery of human remains interred outside of dedicated cemeteries.

Mitigation Measure CUL-3: In the event of the discovery of human remains during demolition, excavation, or construction, there shall be no further excavation or disturbance of the site within a 50-foot radius of the location of such discovery, or any nearby area reasonably suspected to overlie adjacent remains, and the area shall be secured to prevent further disturbance. The City and the Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to their authority, the Coroner shall notify the Native American Heritage Commission within 24 hours, which shall attempt to identify descendants of the deceased Native American. If no satisfactory agreement can be reached as to the disposition of the remains pursuant to this State law, then the landowner, in consultation with a qualified archaeologist, shall formulate an appropriate treatment plan for the find, which might include, but not be limited to, respectful scientific recording and removal, being left in place, removal and reburial on-site, or elsewhere. Associated grave goods are to be treated in the same manner. A final report shall be submitted to the City's Community Development Director prior to release of a Certificate of Occupancy. This report shall contain a description of

the mitigation programs and its results, including a description of the monitoring and testing resources analysis methodology and conclusions, and a description of the disposition/curation of the resources. The report shall verify completion of the mitigation program to the satisfaction of the City's Community Development Director.

Significance with Mitigation: Less than significant.

d) Would the proposed project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: 1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or 2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of the Public Resource Code Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance to a California Native American tribe?

As discussed in impact discussions (b) and (c), no known archeological resources, ethnographic sites, or Native American remains are located on the project site. However, as discussed under impact discussion (b), the project site could contain undiscovered subsurface archaeological deposits, including unrecorded Native American prehistoric archaeological materials. As discussed under impact discussion (b) and (c), ground-disturbing activities associated with the project have the potential to unearth unknown human remains. Therefore, although no known tribal cultural resources have been identified on the project site, the proposed project has the potential to disturb subsurface deposits possessing traditional or cultural significance to Native American or other descendant communities. This is considered a **significant** impact.

Impact CUL-4: Construction activities for the proposed project have the potential to cause a significant impact to an unknown tribal cultural resource as defined in Public Resources Code 21074.

Mitigation Measure CUL-4: Implement Mitigation Measures CUL-2 and CUL-3.

Significance with Mitigation: Less than significant.

4.3.5 Cumulative Impact Analysis

This analysis considers potential impacts of the proposed project when considered along with the potential impacts of the cumulative development projects listed in Table 4-1, *Cumulative*

Projects List. Cumulative cultural resource impacts would occur when a series of actions leads to the loss of a substantial type of site, building, or resource. For example, while the loss of a single historic building may not be significant to the character of a neighborhood or streetscape, continued loss of such resources on a project-by-project basis could constitute a significant cumulative effect. This is most obvious in historic districts, where destruction or alteration of a percentage of the contributing elements may lead to a loss of integrity for the district overall. For example, changes to the setting or atmosphere of an area by adding modern structures on all sides of a historically significant building, thus altering the aesthetics of the streetscape, would create a significant impact. Destruction or relocation of historic buildings would also significantly impact the setting.

As described in impact discussion (a), the proposed project would result in a significant and unavoidable impact due to project implementation removing the historical resource on the project site that is eligible for listing in the California Register under Criterion 3 as a significant example of the work of master architect Goodwin Steinberg. The proposed project could result in a cumulative impact to historic resources if other cumulative development projects would also result in impacts to historical resources.

The planning areas for the two planning projects listed in Table 4-1 (i.e., the Downtown Precise Plan Comprehensive Update and Moffett Boulevard Precise Plan) contain historic resources; however, none of the properties subject to current development sites (as listed in Table 4-1) are on the City of Mountain View's Register of Historic Resources.[3] Cumulative impacts to historic resources would be reduced through adherence to precise plan standards intended to protect historic resources, and would also be reduced through compliance with the City's General Plan policies listed in Table 4.3-1, *City of Mountain View 2030 General Plan Policies Relevant to Cultural Resources*, and adherence to federal and State laws described in Section 4.3.1, *Regulatory Background*. The City's 2030 General Plan EIR identifies less-than-significant impacts to historic resources as a result of implementation of the City's policies and actions to reduce such impacts. Therefore, the proposed project's project-level significant and unavoidable impact to the on-site historic resource would not, in combination with cumulative development projects, result in a significant cumulative impact.

Similar to the proposed project, cumulative development projects could result in impacts to known or unknown subsurface cultural resources that may be on-site. The construction from cumulative development could involve ground disturbance below the level of previous ground disturbance that could result in the discovery of archaeological resources or human remains. Due to the built-out nature of the project area, cumulative development projects would occur in the form of infill/intensification on sites either already developed and/or underutilized; this reduces the likelihood of encountering potential archaeological resources or human remains on-

[3] City of Mountain View, 2022, Mountain View Register of Historic Resources, https://www.mountainview.gov/home/showpublisheddocument/7915/638346084894870000, accessed April 1, 2025.

4.3 Cultural and Tribal Cultural Resources

site unless ground disturbance activities excavate to a greater extent than previously. The existing federal, State, and local regulations and policies described throughout this chapter serve to protect any as-yet-undiscovered cultural resources. Continued compliance with these regulations and implementation of existing policies and requirements, and site-specific protocols in the event of accidental recovery of cultural resources, would preclude cumulative impacts to the maximum extent practicable.

Therefore, in combination with past, present, and reasonably foreseeable projects, the proposed project would result in a **less-than-significant** cumulative impact with respect to all cultural resources.

Significance without Mitigation: Less than significant.

4.4 GEOLOGY AND SOILS

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for implementation of the proposed project to impact geological and soil resources. As described in Chapter 2, *Introduction*, of this Draft EIR, the only significance criteria identified in the California Environmental Quality Act (CEQA) Guidelines that are evaluated in this chapter include potential impacts related to seismic-related ground failure, including liquefaction, and unstable soils. Therefore, this chapter only addresses these two issues.

4.4.1 Regulatory Background

FEDERAL AND STATE

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act, which was passed by the California legislature in 1990, addresses earthquake hazards related to liquefaction and seismically induced landslides. Under the Act, seismic hazard zones are mapped by the State Geologist in order to assist local governments in land use planning. The Act states that "it is necessary to identify and map seismic hazard zones in order for cities and counties to adequately prepare the safety element of their general plans and to encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety." Section 2697(a) of the act states that "cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard."

California Building Code

The California Building Code (CBC), known as the California Building Standards Code, is found in Title 24 of the California Code of Regulations. The CBC incorporates the International Building Code, a model building code adopted in jurisdictions across the United States. Current State law requires every local agency enforcing building regulations, such as cities and counties, to adopt the provisions of the CBC within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission. The CBC is updated every three years. The CBC provides minimum standards to protect property and the public welfare and safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground motion with a specified probability of occurring at the site. Also, the CBC requires the preparation of project-specific geotechnical/engineering reports by a certified engineering geologist and/or geotechnical engineer prior to construction of proposed structures.

4.4 Geology and Soils

LOCAL

The Mountain View Municipal Code contains all ordinances for the city. The Municipal Code is organized by Chapter, Article, Division, and Section.

Article I, *Building Code*, of Chapter 8, *Buildings*, adopts the CBC by reference with specified modifications. The City of Mountain View's Building Inspection Department, which is part of the Community Development Department, is responsible for reviewing plans, issuing building permits and conducting field inspections.

4.4.2 Existing Conditions

Geological and soil conditions in an area can influence the shaking effects of an earthquake. Seismic shaking (or ground shaking) is a general term referring to all aspects of motion of the earth's surface resulting from an earthquake and is normally the major cause of damage in seismic events.

Liquefaction is the rapid transformation of saturated, loose, fine-grained sediment to a fluid-like state because of earthquake ground shaking. In the process, the soil undergoes transient loss of strength, which commonly causes ground displacement or ground failure to occur. In general, where there is any potential for liquefaction, site-specific studies are needed to determine the extent of the hazard if development were to occur in the area.

Lateral spreading is a form of horizontal displacement of soil toward an open channel or other "free" face, such as an excavation boundary. Lateral spreading can result from either the slump of low cohesion unconsolidated material or more commonly by liquefaction of either the soil layer or a subsurface layer underlying soil material on a slope, resulting in gravitationally driven movement. Lateral spreading (lurching) may also occur where open banks and unsupported cut slopes provide a free face. Ground shaking, especially when inducing liquefaction, may cause lateral spreading toward unsupported slopes. Areas most prone to lateral spreading are those that consist of fill material that has been improperly engineered, that have steep, unstable banks, and that have high groundwater tables.

Damage caused by liquefaction and lateral spreading is generally the most severe when liquefaction occurs within 15 to 20 feet of the ground surface. According to the Mountain View General Plan EIR, most of Mountain View, is underlain by materials that have moderate to very high liquefaction potential. A Seismic Hazard Zone for liquefaction has been determined for the areas adjacent to most creek channels and all portions of the city roughly one-half mile north of El Camino Real, which includes the project site.[1]

[1] City of Mountain View, 2012, Draft 2030 General Plan and Greenhouse Gas Reduction Program Environmental Impact Report, State Clearinghouse No. 2011012069, pages 336 - 337.

4.4.3 Significance Criteria

The Initial Study prepared for this Draft EIR (see Appendix A, *Notice of Preparation, Initial Study, and Scoping Comments*) identified that the proposed project would not result in a significant impact for the following significance criteria:

- Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
  - Strong seismic ground shaking?
  - Landslides?
- Would the project result in substantial soil erosion or the loss of topsoil?
- Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
- Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
- Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The proposed project would have a significant impact under Appendix G, *Environmental Checklist Form*, of the California Environmental Quality Act (CEQA) Guidelines if it would:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

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

4.4.4 Project Impact Analysis

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts.

4.4 Geology and Soils

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

The proposed project would replace the existing Mountain View Police Services - Fire Administration building with a new Public Safety Building with the same local community-serving use and purpose for the residents of Mountain View. The proposed project would include demolition of the existing structures and surface parking facilities, and construction of new facilities and surface parking lots. No excavation is proposed except for trenching for utilities.

Because the project site, like much of California, is in a seismically active area and on a site with known liquefaction hazards, the project sponsor would be required to prepare a site-specific geologic technical study pursuant to the required mitigation identified in the General Plan EIR. As found in the General Plan EIR, with the preparation of a site-specific geologic technical study by a certified engineering geologist and/or geotechnical engineer prior to construction of proposed structures, and implementation of the recommendations of the study, impacts would be less-than-significant.[2]

With respect to lateral spreading, as described in Section 4.4.2, *Existing Conditions*, ground shaking, especially when inducing liquefaction, may cause lateral spreading toward unsupported slopes. However, the proposed project does not propose any deep excavation such as a subterranean level for parking, or other uses, that would involve an unsupported slope and therefore the risk associated with lateral spreading would be low. However, the findings of the required geotechnical study would address any concerns from hazards due to lateral spreading.

Furthermore, the proposed project would be subject to compliance with the CBC, which is adopted with modifications by the City in Municipal Code Article I, *Building Code*, of Chapter 8, *Buildings*. The CBC provides minimum standards to protect property and the public welfare and safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground motion with a specified probability of occurring at the site. Also, the CBC requires the preparation of project-specific geotechnical/engineering reports by a certified engineering geologist and/or geotechnical engineer prior to construction of proposed structures. The proposed project would be required to comply with the recommendations in these reports. Any structures built for the proposed project would adhere to the most recent version of the CBC.

[2] City of Mountain View, 2012, Draft 2030 General Plan and Greenhouse Gas Reduction Program Environmental Impact Report, State Clearinghouse No. 2011012069, page 345.

The proposed project involves on-site construction activities and development of new structures on a site with existing seismic and soils hazards. In addition, the proposed project involves an increase in the occupancy of the project site (due to the proposed increase in on-site employment), which would expose additional people to these existing hazards when compared to existing conditions. Because no site-specific geotechnical study has been prepared for the project, impacts are considered **significant** without mitigation.

Impact GEO-1: The construction activities, increased site occupancy, and development of new structures under the proposed project could exacerbate an existing hazard associated with liquefaction due to seismic events.

> **Mitigation Measure GEO-1:** Prior to the issuance of building permits, the project sponsor shall retain the services of a certified engineering geologist and/or geotechnical engineer to prepare a site-specific geotechnical study based on the most recent draft of the conceptual site plans. The geotechnical study shall address, but is not limited to, the effects of seismically induced liquefaction, and include recommendations to ensure any potential hazards related to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction would not occur. The geotechnical study shall be approved by the City of Mountain View's Building Inspection Department prior to the issuance of building permits.
>
> **Significance with Mitigation:** Less than significant.

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

As described in impact discussion (a), the project site is in a seismically active area, as is much of California, and on a site with known liquefaction hazards. Due to the low relief of the on- and off-site topography, earthquake-induced slope stability is not an issue on the project site. Further, the proposed project would not include any subterranean levels and, as such, no deep excavation would occur. Accordingly, impacts associated with lateral spreading or subsidence, would not be an issue.

Implementation of Mitigation Measure GEO-1 requires the preparation of a project-specific geotechnical/engineering reports by a certified engineering geologist and/or geotechnical engineer prior to construction of proposed structures to ensure that any effects due to unstable soils would be mitigated to a less-than-significant level. As described under impact discussion (a), the proposed project involves on-site construction activities, development of new structures, and an increase in site occupancy that would expose additional people to existing liquefaction hazards. Without mitigation, this impact would be considered **significant**.

4.4 Geology and Soils

Impact GEO-2 The construction activities, development, increased site occupancy involved in the proposed project could exacerbate an existing hazard associated with unstable soils due to seismically induced liquefaction.

Mitigation Measure GEO-2: Implement Mitigation Measure GEO-1.

Significance with Mitigation: Less than significant.

4.4.5 Cumulative Impact Analysis

The cumulative setting includes the projects listed in Table 4-1, *Cumulative Projects List*, in Chapter 4, *Environmental Analysis*. As discussed previously, construction and operation of the proposed project would not result in significant impacts related to geology and soils with implementation of Mitigation Measure GEO-1 and GEO-2. Although the project site and surrounding area include some hazards due to liquefaction soils, mandatory compliance with CBC and the Municipal Code would ensure these impacts would be addressed through site-specific development requirements.

Cumulative development on the sites listed in Table 4-1 would be subject to the same regulations as the proposed project. Because impacts associated with geology and soils are by their nature focused on specific sites or areas, the less-than-significant impacts with implementation of Mitigation Measure GEO-1 and GEO-2 to avoid seismically induced hazards, and impacts from the proposed project would not contribute to a cumulative increase in hazards in the project vicinity or greater Mountain View area. Therefore, cumulative impacts associated with geology and soils would be **less than significant**.

Significance without Mitigation: Less than significant.

4.5 GREENHOUSE GAS EMISSIONS

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the adoption and implementation of the proposed project to impact greenhouse gas (GHG) emissions in a local and regional context. Because no single project is large enough to result in a measurable increase in global concentrations of GHG, climate change impacts of a project are considered on a cumulative basis based on the GHG emissions reduction goals identified in the California Air Resources Board's (CARB) 2022 Scoping Plan.

Modeling data is included in Appendix B, *Air Quality and Greenhouse Gas Emissions Data*, of this Draft Environmental Impact Report (EIR).

Environmental Setting

TERMINOLOGY

The following are definitions for terms used throughout this chapter.

- **Greenhouse gases (GHG).** Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.
- **Global warming potential (GWP).** Metric used to describe how much heat a molecule of a GHG absorbs relative to a molecule of carbon dioxide (CO_2) over a given period of time (20, 100, and 500 years). CO_2 has a GWP of 1.
- **Carbon dioxide-equivalent (CO_2e).** The standard unit to measure the amount of GHGs in terms of the amount of CO_2 that would cause the same amount of warming. CO_2e is based on the GWP ratios between the various GHGs relative to CO_2.
- **$MTCO_2e$.** Metric ton of CO_2e.
- **$MMTCO_2e$.** Million metric tons of CO_2e.

GREENHOUSE GASES AND CLIMATE CHANGE

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHGs, to the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed in the 20th and 21st centuries. Other GHGs identified by the IPCC that contributes to global warming to a lesser extent are nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons,

4.5 Greenhouse Gas Emissions

perfluorocarbons, and chlorofluorocarbons.[1,2,3] The major GHGs applicable to the proposed project are briefly described herein.

- **Carbon dioxide (CO_2)** enters the atmosphere through the burning of fossil fuels (i.e., oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and also as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (i.e., sequestered) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane (CH_4)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in landfills and water treatment facilities.
- **Nitrous oxide (N_2O)** is emitted during agricultural and industrial activities as well as during the combustion of fossil fuels and solid waste.

GHGs are dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Some GHGs have stronger greenhouse effects than others. These are referred to as high GWP gases. The GWP is used to convert GHGs to CO_2-equivalence (CO_2e) to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. For example, under the IPCC Fifth Assessment Report (AR5) GWP values for CH_4, 10 MT of CH_4 would be equivalent to 280 MT of CO_2.

4.5.1 Regulatory Background

FEDERAL

The U.S. Environmental Protection Agency (USEPA) announced on December 7, 2009, that GHG emissions threaten the public health and welfare of the American people and that GHG emissions from on-road vehicles contribute to that threat. The USEPA's final findings respond to the 2007 U.S. Supreme Court decision that GHG emissions fit within the Clean Air Act definition

[1] Intergovernmental Panel on Climate Change, 2001, *Third Assessment Report: Climate Change 2001*, New York: Cambridge University Press.

[2] Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals); however, water vapor is not considered a pollutant because it is considered part of the feedback loop rather than a primary cause of change.

[3] Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. The share of black carbon emissions from transportation is dropping rapidly and is expected to continue to do so between now and 2030 as a result of California's air quality programs. The remaining black carbon emissions will come largely from woodstoves/fireplaces, off-road applications, and industrial/commercial combustion (CARB, December 2022, 2022 Scoping Plan for Achieving Carbon Neutrality. https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf). However, State and national GHG inventories do not include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

of air pollutants. The findings do not impose any emission reduction requirements but allowed the USEPA to finalize the GHG standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation.[4]

To regulate GHGs from passenger vehicles, the USEPA was required to issue an endangerment finding.[5] The finding identified emissions of six key GHGs—CO_2, CH_4, N_2O, hydrofluorocarbons, perfluorocarbons, and SF_6—that have been the subject of scrutiny and intense analysis for decades by scientists in the United States and around the world. The first three are applicable to the proposed project's GHG emissions inventory because they constitute the majority of GHG emissions and, according to guidance by the Bay Area Air District (Air District), are the GHG emissions that should be evaluated as part of a project's GHG emissions inventory.

US Mandatory Report Rule for GHGs (2009)

In response to the endangerment finding, the USEPA issued the Mandatory Reporting of GHG Rule that requires substantial emitters of GHG emissions (e.g., large stationary sources) to report GHG emissions data. Facilities that emit 25,000 MT or more of CO_2e per year are required to submit an annual report.

Update to Corporate Average Fuel Economy Standards (2017 to 2026)

The federal government issued new Corporate Average Fuel Economy (CAFE) standards in 2012 for vehicle model years 2017 to 2025, requiring a fleet average of 54.5 miles per gallon (MPG) in 2025. However, on March 30, 2020, the USEPA finalized updated CAFE and GHG emissions standards for passenger cars and light trucks, covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021 to 2026. Under SAFE, the fuel economy standards will increase 1.5 percent per year compared to the 5 percent per year under the CAFE standards established in 2012. Overall, SAFE requires a fleet average of 40.4 MPG for model year 2026 vehicles (85 Federal Register 24174 (April 30, 2020)).

On December 21, 2021, under the direction of Executive Order (EO) 13990 issued by President Biden, the National Highway Traffic Safety Administration (NHTSA) repealed SAFE Vehicles Rule Part One, which had preempted state and local laws related to fuel economy standards. In addition, the NHTSA announced new proposed fuel standards on March 31, 2022. Fuel efficiency under the new standards proposed will increase 8 percent annually for model years 2024 to 2025 and 10 percent for model year 2026. Overall, the new CAFE standards require a

[4] US Environmental Protection Agency, December 2009, EPA: Greenhouse Gases Threaten Public Health and the Environment: Science Overwhelmingly Shows Greenhouse Gas Concentrations at Unprecedented Levels due to Human Activity, https://archive.epa.gov/epapages/newsroom_archive/newsreleases/08d11a451131bca585257685005bf252.html
[5] US Environmental Protection Agency, 2009, USEPA: Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act, https://www.epa.gov/climate-change/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a.

4.5 Greenhouse Gas Emissions

fleet average of 49 MPG for passenger vehicles and light trucks for model year 2026, which would be a 10 MPG increase relative to model year 2021.[6]

STATE

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in EO S-03-05, EO B-30-15, EO B-55-18, Assembly Bill (AB) 32, AB 1279, Senate Bill (SB) 32, and SB 375.

Executive Order S-03-05

EO S-03-05 was signed June 1, 2005, and set the following GHG reduction targets for the State:2000 levels by 2010, 1990 levels by 2020, and 80 percent below 1990 levels by 2050.

Assembly Bill 32, the Global Warming Solutions Act (2006)

AB 32 was passed by the California State legislature on August 31, 2006, to place the state on a course toward reducing its contribution of GHG emissions. AB 32 follows the 2020 tier of emissions reduction targets established in EO S-03-05. CARB prepared the 2008 Scoping Plan to outline a plan to achieve the GHG emissions reduction targets of AB 32.

Executive Order B-30-15

EO B-30-15, signed April 29, 2015, set a goal of reducing GHG emissions in the state to 40 percent of 1990 levels by year 2030. EO B-30-15 also directed CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the State and requires State agencies to implement measures to meet the interim 2030 goal as well as the long-term goal for 2050 in EO S-03-05. It also requires the Natural Resources Agency to conduct triennial updates of the California adaption strategy, *Safeguarding California*, in order to ensure climate change is accounted for in State planning and investment decisions.

Senate Bill 32 and Assembly Bill 197

In September 2016, SB 32 and AB 197 were signed into law, making the EO goal for year 2030 into a statewide mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires CARB to prioritize direct emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

[6] National Highway Traffic Safety Administration, April 2022, USDOT Announces New Vehicle Fuel Economy Standards for Model year 2024-2026, https://www.nhtsa.gov/press-releases/usdot-announces-new-vehicle-fuel-economy-standards-model-year-2024-2026, accessed May 20, 2024.

Executive Order B-55-18

EO B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." EO B-55-18 directs CARB to work with relevant State agencies to ensure future scoping plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other State goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO_2e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Assembly Bill 1279

AB 1279, signed in September 2022, codifies the carbon neutrality targets of EO B-55-18 for year 2045 and sets a new legislative target for year 2045 of 85 percent below 1990 levels for anthropogenic GHG emissions. CARB was required to update the Scoping Plan to identify and recommend measures to achieve the net-zero and GHG emissions-reduction goals.

2022 Climate Change Scoping Plan

CARB adopted the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on December 15, 2022, which lays out a path to achieve carbon neutrality by 2045 or earlier and to reduce the state's anthropogenic GHG emissions.[7] The Scoping Plan was updated to address the carbon neutrality goals of EO B-55-18 and the ambitious GHG reduction target as directed by AB 1279. Previous scoping plans focused on specific GHG reduction targets for industrial, energy, and transportation sectors—to meet 1990 levels by 2020, and then the more aggressive 40 percent below that for the 2030 target. This Plan expands upon earlier scoping plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. Carbon neutrality takes it one step further by expanding actions to capture and store carbon, including through natural and working lands and mechanical technologies, while drastically reducing anthropogenic sources of carbon pollution at the same time. The path forward was informed by the recent IPCC AR6; the measures would achieve 85 percent below 1990 levels by 2045 in accordance AB 1279.

Senate Bill 375

SB 375, the Sustainable Communities and Climate Protection Act, was adopted in 2008 to connect the GHG emissions reduction targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (i.e., excluding emissions

[7] California Air Resources Board, December 2022, 2022 Scoping Plan for Achieving Carbon Neutrality, https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf.

associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce VMT and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPO). The Metropolitan Transportation Commission (MTC) is the MPO for the Bay Area region, which includes the City of Mountain View. Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target.

CARB is required to update the targets for the MPOs every eight years. In June 2017, CARB released updated targets and technical methodology, and then released another update in February 2018, which became effective in October 2018. CARB adopted the updated targets and methodology on March 22, 2018. All SCSs adopted after October 1, 2018, are subject to these new targets. The updated targets consider the need to further reduce VMT, as identified in the 2017 Scoping Plan Update, while balancing the need for additional and more flexible revenue sources to incentivize positive planning and action toward sustainable communities. The updated SB 375 targets are in units of percent per capita reduction in GHG emissions from automobiles and light trucks compared to 2005. This excludes reductions anticipated from implementation of State technology and fuels strategies and any potential future State strategies such as statewide road user pricing. The updated targets call for greater per-capita GHG emission reductions from SB 375 than were currently in place, which for 2035 translates into updated targets that either match or exceed the emission reduction levels in the MPOs' currently adopted SCSs. CARB's updated targets result in an additional reduction of over 8 $MMTCO_2e$ in 2035 compared to the prior targets.[8]

Transportation Sector Specific Regulations

Advanced Clean Fleets and Advanced Clean Trucks

CARB adopted the Advanced Clean Fleets (ACF) regulation in 2023 to accelerate the transition to zero-emission medium- and heavy-duty vehicles. In conjunction with the Advanced Clean Trucks (ACT) regulation, the ACF regulations helps to ensure that medium- and heavy-duty ZEVs are brought to the market, by requiring certain fleets to purchase ZEVs. The ACF ZEV phase-in approach provides initial focus where the best fleet electrification opportunities exist, sets clear targets for regulated fleets to make a full conversion to ZEVs, and creates a catalyst to accelerate development of a heavy-duty public charging infrastructure network.

Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to

[8] California Air Resources Board, February 2018, Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets. https://ww2.arb.ca.gov/sites/default/files/2020-06/SB375_Updated_Final_Target_Staff_Report_2018.pdf.

medium-duty vehicles) from 2009 through 2016 and was anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the USEPA. In 2012, the USEPA issued a Final Rulemaking that set even more stringent fuel economy and GHG emissions standards for model years 2017 through 2025 light-duty vehicles. (See also the discussion in federal regulations under "*Update to Corporate Average Fuel Economy Standards [2017 to 2026]*.")

In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of ZEVs into a single package of standards. Under California's Advanced Clean Car program, by 2025 new automobiles will emit 34 percent less GHG emissions and 75 percent less smog-forming emissions.

Executive Order S-01-07

On January 18, 2007, the State set a new low carbon fuel standard (LCFS) for transportation fuels sold in the state. EO S-01-07 set a declining standard for GHG emissions measured in CO_2e gram per unit of fuel energy sold in California. The LCFS required a reduction of 2.5 percent in the carbon intensity of California's transportation fuels by 2015 and a reduction of at least 10 percent by 2020. The standard applied to refiners, blenders, producers, and importers of transportation fuels, and used market-based mechanisms to allow these providers to choose the most economically feasible methods for reducing emissions during the "fuel cycle."

Executive Order B-16-2012

On March 23, 2012, the State directed CARB, the California Energy Commission (CEC), the Public Utilities Commission, and other relevant agencies to work with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate ZEVs in major metropolitan areas, including infrastructure to support them (e.g., EV charging stations). EO B-16-2012 also directed the number of ZEVs in California's State vehicle fleet to increase through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are ZE by 2015 and at least 25 percent by 2020. The EO also established a target for the transportation sector of reducing GHG emissions to 80 percent below 1990 levels.

Executive Order N-79-20

On September 23, 2020, Governor Newsom signed EO N-79-20, establishing a goal that 100 percent of in-state sales of new passenger cars and trucks will be ZE by 2035. Additionally, the fleet goals for trucks are that 100 percent of drayage trucks are ZE by 2035, and 100 percent of medium- and heavy-duty vehicles in the state are ZE by 2045, where feasible. The EO's goal for the State is to transition to 100 percent ZE off-road vehicles and equipment by 2035, where feasible.

4.5 Greenhouse Gas Emissions

Renewables Portfolio: Carbon Neutrality Regulations

Senate Bills 1078, 107, and X1-2 and Executive Order S-14-08

A major component of California's Renewable Energy Program is the renewables portfolio standard established under Senate Bills 1078 (Sher) and 107 (Simitian). Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. EO S-14-08, signed in November 2008, expanded the State's renewable energy standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Eligible renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The increase in renewable sources for electricity production decreases indirect GHG emissions from development projects because electricity production from renewable sources is generally considered carbon neutral.

Senate Bill 350

SB 350 was signed into law in September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

Senate Bill 100

On September 10, 2018, SB 100 was signed into law. Under SB 100, the RPS for public-owned facilities and retail sellers consists of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. SB 100 also established a new RPS requirement of 50 percent by 2026. Furthermore, the bill establishes an overall State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Senate Bill 1020

SB 1020 was signed into law on September 16, 2022. SB 1020 provides interim RPS targets (90 percent renewable energy by 2035 and 95 percent renewable energy by 2040) and requires renewable energy and zero-carbon resources to reach 100 percent clean electricity by 2045.

Energy Efficiency Regulations

California Building Code: Building Energy Efficiency Standards

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 (Title 24, Part 6, of the California Code of Regulations [CCR]). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for the consideration and possible incorporation of new energy efficiency technologies and methods.

The Building Energy Efficiency Standards encourage efficient electric heat pumps, establish electric-ready requirements for new construction, expand solar photovoltaic and battery storage standards, and strengthen ventilation standards, among other approaches. The 2022 standards require mixed-fuel single-family homes to be electric-ready to accommodate replacement of gas appliances with electric appliances. In addition, the new standards include prescriptive photovoltaic system and battery energy storage system requirements for high-rise, multi-family buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers.

California Building Code: CALGreen

The California Green Building Standards Code (24 CCR, Part 11, known as "CALGreen") was adopted as part of the California Building Standards Code. CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.[9] The mandatory provisions of CALGreen became effective January 1, 2011, and were last updated in 2022. The 2022 CALGreen standards became effective on January 1, 2023.

2006 Appliance Efficiency Regulations

The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601–1608) were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non–federally regulated appliances. Though these regulations are now often viewed as "business as usual," they exceed the standards imposed by all other states, and they reduce GHG emissions by reducing energy demand.

[9] The green building standards became mandatory in the 2010 edition of the Code.

4.5 Greenhouse Gas Emissions

Solid Waste Diversion Regulations

Assembly Bill 939: Integrated Waste Management Act of 1989

California's Integrated Waste Management Act of 1989 (AB 939, Public Resources Code Section 40050 et seq.) set a requirement for cities and counties throughout the state to divert 50 percent of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting. In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. To help achieve this, the Act requires that each city and county prepare and submit a source reduction and recycling element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.

Assembly Bill 341

AB 341 (Chapter 476, Statutes of 2011) increased the statewide goal for waste diversion to 75 percent by 2020 and requires recycling of waste from commercial and multi-family residential land uses. Section 5.408 of CALGreen also requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

Assembly Bill 1327

The California Solid Waste Reuse and Recycling Access Act (AB 1327, Public Resources Code Section 42900 et seq.) requires areas to be set aside for collecting and loading recyclable materials in development projects. The Act required the California Integrated Waste Management Board to develop a model ordinance for adoption by any local agency requiring adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own.

Assembly Bill 1826

In October 2014, AB 1826 was signed into law, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses and multi-family residential dwellings with five or more units. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed with food waste.

Water Efficiency Regulations

Senate Bill X7-7

The 20x2020 Water Conservation Plan was issued by the California Department of Water Resources (DWR) in 2010 pursuant to SB 7, which was adopted during the 7th Extraordinary Session of 2009–2010 and therefore dubbed "SBX7-7." SBX7-7 mandated urban water conservation and authorized DWR to prepare a plan implementing urban water conservation requirements, which DWR did through the 20x2020 Water Conservation Plan. In addition, it required agricultural water providers to prepare agricultural water management plans, measure water deliveries to customers, and implement other efficiency measures. SBX7-7 required urban water providers to adopt a water conservation target of a 20 percent reduction in urban per capita water use by 2020 compared to 2005 baseline use.

Assembly Bill 1881: Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act of 2006 (AB 1881) requires local agencies to adopt the updated DWR model ordinance or an equivalent. AB 1881 also requires CEC to consult with DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves, to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

Short-Lived Climate Pollutant Reduction Strategy

On September 19, 2016, SB 1383 was signed into law to supplement the GHG reduction strategies in the Scoping Plan to consider short-lived climate pollutants, including black carbon and methane. Black carbon is the light-absorbing component of fine particulate matter produced during the incomplete combustion of fuels. SB 1383 required CARB, no later than January 1, 2018, to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. The bill also established targets for reducing organic waste in landfills. On March 14, 2017, CARB adopted the Short-Lived Climate Pollutant Reduction Strategy, which identifies the State's approach to reducing anthropogenic and biogenic sources of short-lived climate pollutants. Anthropogenic sources of black carbon include on- and off-road transportation, residential wood burning, fuel combustion (charbroiling), and industrial processes. According to CARB, ambient levels of black carbon in California are 90 percent lower than in the early 1960s, despite the tripling of diesel fuel use.[10] In-use on-road rules were

[10] California Air Resources Board, March 2017, Short-Lived Climate Pollutant Reduction Strategy, https://www.arb.ca.gov/cc/shortlived/shortlived.htm.

expected to reduce black carbon emissions from on-road sources by 80 percent between 2000 and 2020.

REGIONAL

Plan Bay Area: Strategy for a Sustainable Region

MTC and the Association of Bay Area Governments (ABAG) adopted Plan Bay Area 2050 on October 21, 2021.[11] Plan Bay Area 2050 provides transportation and environmental strategies to continue to meet the regional transportation-related GHG reduction goals of SB 375. An overarching goal of the regional plan is to concentrate development in areas where there are existing services and infrastructure rather than allocate new growth to outlying areas where substantial transportation investments would be necessary to achieve the per capita passenger vehicle, VMT, and associated GHG emissions reductions.

Bay Area Clean Air Plan

The Air District adopted the 2017 *Clean Air Plan, Spare the Air, Cool the Climate* (Clean Air Plan) on April 19, 2017. The 2017 Clean Air Plan also lays the groundwork for reducing GHG emissions in the Bay Area to meet the State's 2030 GHG reduction target and 2050 GHG reduction goal.

Bay Area Commuter Benefits Program

Under Air District Regulation 14, Model Source Emissions Reduction Measures, Rule 1, Bay Area Commuter Benefits Program, employers with 50 or more full-time employees within the Air District are required to register and offer commuter benefits to employees. In partnership with the Air District and MTC, the Rule's purpose is to improve air quality, reduce GHG emissions, and decrease the Bay Area's traffic congestion by encouraging employees to use alternative commute modes, such as transit, vanpool, carpool, bicycling, and walking. The benefits program allows employees to choose from one of four commuter benefit options, including a pre-tax benefit, employer-provided subsidy, employer-provided transit, and alternative commute benefit.

LOCAL

Valley Transportation Authority 2021 Congestion Management Program Document

The Valley Transportation Authority (VTA) Congestion Management Program (CMP) aims to adopt transportation improvement programs for Santa Clara County.[12] The CMP provides a roadmap to reduce congestion, land use decision-making and air quality programs among local

[11] Association of Bay Area Governments and the Metropolitan Transportation Commission, October 2021, Plan Bay Area 2050. https://abag.ca.gov/sites/default/files/documents/2021-11/Plan_Bay_Area_2050_October_2021.pdf, accessed May 20, 2024.
[12] Valley Transportation Authority, December 2021, 2021 Congestion Management Program Document, https://www.vta.org/sites/default/files/2022-01/2021CMPDocumentV2_Reduced.pdf

jurisdictions. The 2021 update also documents changes to VTA's Transportation Demand Program (TDM), regional planning efforts by ABAG and MTC, and future updates to the Multimodal Improvement Plan. Develop a list of projects intended to maintain or improve the level of service on the designated system and to maintain transit performance standards.

Mountain View Code of Ordinances

The Mountain View Code of Ordinances includes various directives to minimize adverse impacts to greenhouse gas emissions in the City of Mountain View. The following Ordinances would apply to the proposed project that would reduce GHG emission impacts:

- Section 8.20.12, *Subsection 101.10.1.2.2 added*, adopts the green building standards for nonresidential new construction. All nonresidential new construction must comply with the following:
  - The mandatory measures of the 2022 California Green Building Standards Code and any Mountain View amendments;
  - Shall meet the intent of LEED ® Gold certified;
  - Shall meet the parking requirements per Table 101.10 and Table A5.106.5.3.2;
  - Shall demonstrate energy compliance to meet or exceed Title 24, Part 6.
- Section 8.20.14, *Table 101.10 added*, adopts the following applicable California Green Building Standards Code.
- Section 8.20.42, *Subsection 5.106.5.3.2 amended* and *Table 5.106.5.3.2 added*, adopts and amends the following applicable Tier 2 CALGreen electric vehicle (EV) parking standards.

Mountain View Municipal Operations Climate Action Plan

The City adopted its Municipal Operations Climate Action Plan (MOCAP) in 2015 to address climate action planning for government operations in the city. The Plan defines actions that the City can implement to reduce greenhouse gas emissions resulting from municipal operations (e.g., government buildings, facilities, and vehicle fleet). In addition to the emission reduction benefits, implementation of the Plan intends to lower energy, water, and fuel costs; reduce exposure to future energy cost increases; and improve government service delivery. The MOCAP was prepared in accordance with the State's Local Government Operation Protocol which provides guidance on how to inventory greenhouse gas emissions resulting from government buildings and facilities, government fleet vehicles, wastewater treatment and potable water treatment facilities, landfill facilities, and other operations and services[13]

[13] City of Mountain View, May 2015, Municipal Operations Climate Action Plan, https://www.mountainview.gov/home/showpublisheddocument/816/637940976800700000

4.5 Greenhouse Gas Emissions

4.5.2 Existing Conditions

In 2022, the statewide GHG emissions inventory was updated for 2000 to 2020 emissions using the GWPs in IPCC's AR4, and California produced 369.2 $MMTCO_2e$ GHG emissions,[14] 35.3 $MMTCO_2e$ lower than 2019 levels and 61.8 $MMTCO_2e$ below the 2020 GHG limit of 431 $MMTCO_2e$. The 2019 to 2020 decrease in emissions is likely due in large part to the impacts of the COVID-19 pandemic. Since the peak level in 2004, California's GHG emissions have generally followed a decreasing trend. In 2014, statewide GHG emissions dropped below the 2020 GHG limit and have remained below the limit since that time. Per capita GHG emissions in California have dropped from a 2001 peak of 13.8 metric tons per person to 9.3 metric tons per person in 2020, a 33-percent decrease.[15]

California's transportation sector remains the largest generator of GHG emissions, producing 37 percent of the state's total emissions in 2020. Industrial sector emissions made up 20 percent and electric power generation made up 16 percent of the state's emissions inventory. Other major sectors of GHG emissions include commercial and residential (4 percent), agriculture and forestry (8.6 percent), high-GWP gases (5.8 percent), and recycling and waste (2 percent).[16]

Transportation emissions continued to decline for the past three consecutive years with the rise of fuel efficiency in the passenger vehicle fleet and increase in battery electric vehicles. The deployment of renewable and/or less-carbon-intensive resources and higher energy efficiency standards have facilitated the continuing decline in fossil fuel electricity generation. The industrial sector trend has been flatter in recent years but saw a decrease of 7.1 $MMTCO_2e$ in 2020. Commercial and residential emissions saw a decrease of 1.7 $MMTCO_2e$. Emissions from high-GWP gases have continued to increase as they replace ozone-depleting substances that are being phased out under the 1987 Montreal Protocol. Emissions from other sectors have remained mostly constant in recent years. Overall trends in the inventory also continue to demonstrate that the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross domestic product) is declining. From 2000 to 2020, the carbon intensity of California's economy decreased by 49 percent while the gross domestic product increased by 56 percent.[17]

[14] California Air Resources Board, October 26, 2022, California Greenhouse Gas 2000-2020 Trends of Emissions and Other Indicators Report. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf.
[15] California Air Resources Board, October 26, 2022, California Greenhouse Gas 2000-2020 Trends of Emissions and Other Indicators Report. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf.
[16] California Air Resources Board, October 26, 2022, California Greenhouse Gas 2000-2020 Trends of Emissions and Other Indicators Report. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf.
[17] California Air Resources Board, October 26, 2022, California Greenhouse Gas 2000-2020 Trends of Emissions and Other Indicators Report. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf.

4.5.3 Significance Criteria

Appendix G, *Environmental Checklist Form*, of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant GHG emissions impact if it would:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

4.5.4 Project Impact Analysis

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts.

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

A project does not generate enough GHG emissions on its own to influence global climate change; therefore, this section measures the project's contribution to the cumulative environmental impact associated with GHG emissions.

Development of the proposed project would contribute to climate change through direct and indirect emissions of GHG from the construction activities needed to implement the project, which would generate a short-term increase in GHG emissions, as well as a long-term increase in GHG emissions from on-road mobile sources, energy use, area sources, water use/wastewater generation, and solid waste disposal. As identified in the Air District's 2022 CEQA Air Quality Guidelines, short-term construction activities are one-time emissions that would not substantially contribute to GHG emissions impacts. While the Air District does not have an adopted significance threshold for construction emissions, the Air District recommends that construction GHG emissions are quantified and disclosed. As such, Table 4.5-1, *Construction-Related GHG Emissions*, provides the construction-related GHG emissions associated with implementation of the proposed project.

4.5 Greenhouse Gas Emissions

Table 4.5-1 Construction-Related GHG Emissions

Construction Year	MT CO_2e
1	343
2	444
3	385

Source: California Emissions Estimator Model, Version 2022.1
Notes: MT CO_2e = Metric Ton (MT) of Carbon Dioxide equivalent (CO_2e)

For operational phase, the Air District identifies in its 2022 CEQA Air Quality Guidelines that projects that implement the BMPs shown in Table 4.5-2, C*onsistency Analysis with the Air District's GHG Best Management Practices*, would contribute their fair share of what will be required to achieve the State's long-term climate goals. As shown in Table 4.5-2, the proposed project would be consistent with the Air District's GHG BMPs; therefore, impacts to the environment would be **less than significant**.

Table 4.5-2 Consistency Analysis with the Air District's GHG Best Management Practices

Sector	Consistency Analysis
Buildings	
a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).	**Consistent.** As described in Chapter 3, *Project Description*, the proposed project will be constructed as all-electric buildings with no natural gas appliances or plumbing. As such, the proposed project would be consistent with this BMP.
b. The project will not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.	**Consistent.** The proposed buildings would be built to comply with the most current CALGreen Building Code requirements and building efficiency standards to reduce unnecessary energy consumption. Moreover, as determined in Section 3.6, *Energy*, in the Initial Study (see Appendix A, *Notice of Preparation, Initial Study, and Scoping Comments*), the proposed project was determined to not result in wasteful, inefficient, or unnecessary consumption of energy resources.
Transportation	
a. Achieve compliance with electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.	**Consistent.** In compliance with the City's adoption of the CALGreen standards, the proposed project would implement the applicable CALGreen electric vehicle parking stall standards, thereby increasing access to alternative refueling infrastructure. Also, as described in Chapter 3, *Project Description*, the proposed project will include CALGreen Tier 2 parking standards. As such, the proposed project would be consistent with this BMP.
b. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of	**Consistent**. As described in Section 4.8, *Transportation*, the increase in staff is not substantial and represents an approximately 8-percent increase from existing conditions. Therefore, implementation of the proposed project would generate a nominal increase in vehicle trips.

Table 4.5-2 Consistency Analysis with the Air District's GHG Best Management Practices

the California Climate Change Scoping Plan or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA: • Residential projects: 15 percent below the existing VMT per capita. • Office projects: 15 percent below the existing VMT per employee. • Retail projects: no net increase in existing VMT.	However, because, even at maximum capacity, the new employees at the project site would be relocated from existing office space elsewhere in the city, the increase in trips would not represent net new trips for the city as a whole. The proposed project's VMT impacts are determined to be less than significant. Because the SB 743 VMT reduction targets are designed to produce reductions in transportation-related GHG emissions, the proposed project is considered consistent with this BMP.

Source: Bay Area Air District, April 2023, California Environmental Quality Act Air Quality Guidelines. https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines.

Significance without Mitigation: Less than significant.

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

Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan, ABAG's/MTC's *Plan Bay Area 2050,* and the City's MOCAP. A consistency analysis with these plans is presented below.

CARB Scoping Plan

The CARB Scoping Plan is applicable to State agencies but is not directly applicable to cities, counties, and individual projects (i.e., the Scoping Plan does not require local jurisdictions to adopt its policies, programs, or regulations to reduce GHG emissions). However, new regulations adopted by the State agencies from the Scoping Plan result in GHG emissions reductions at the local level. Local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that affect a local jurisdiction's emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the LCFS and changes in the CAFE standards. Additionally, local jurisdictions are encouraged to prepare local GHG reduction plans to align local GHG reductions with the State GHG reduction targets identified in the Scoping Plan.

Statewide strategies to reduce GHG emissions in the 2022 Climate Change Scoping Plan include: implementing SB 100, which expands the RPS to 60 percent by 2030; expanding the Low Carbon

4.5 Greenhouse Gas Emissions

Fuel Standards (LCFS) to 18 percent by 2030; implementing the Mobile Source Strategy to deploy zero-electric vehicle buses and trucks; implementing the Sustainable Freight Action Plan; implementing the Short-Lived Climate Pollutant Reduction Strategy, which reduces methane and hydrofluorocarbons to 40 percent below 2013 levels by 2030 and black carbon emissions to 50 percent below 2013 levels by 2030; continuing to implement SB 375; creating a post-2020 Cap-and-Trade Program; and developing an Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the CAFE standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG emissions reduction goals of AB 32, SB 32, and AB 1279. In addition, new developments are required to comply with the most current Building Energy Efficiency Standards and CALGreen. The proposed project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32, SB 32, and AB 1279 were adopted. Therefore, this impact would be **less than significant**.

ABAG/MTC's Plan Bay Area

Plan Bay Area 2050 is the Bay Area's regional transportation plan to achieve the passenger vehicle emissions reductions identified under SB 375. Plan Bay Area 2050 is the current SCS for the Bay Area, adopted October 21, 2021. In addition to significant transit and roadway performance investments to encourage focused growth, Plan Bay Area 2050 directs funding to neighborhood active transportation and complete streets projects, climate initiatives, lifeline transportation and access initiatives, safety programs, and PDA planning.[18]

While Plan Bay Area 2050 does not override local land use control, it provides guidance to the local jurisdictions such as Santa Clara County on how future development can be consistent with the State's GHG and VMT reduction goals. This includes constructing more infill development in downtowns and centers in close proximity to jobs and services.

Plan Bay Area 2050 is the Bay Area's Regional Transportation Plan/Sustainable Community Strategy that identifies the sustainable vision for the Bay Area.[19] The proposed project would result in the redevelopment of the project site where there is already access to existing infrastructure and services. Therefore, the proposed project would not conflict with the land use concept plan in Plan Bay Area 2050 and impacts would be **less than significant**.

[18] Association of Bay Area Governments and the Metropolitan Transportation Commission, October 2021, Plan Bay Area 2050, https://www.planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_October_2021.pdf, accessed October 24, 2022.
[19] Association of Bay Area Governments and the Metropolitan Transportation Commission, October 2021, Plan Bay Area 2050, https://www.planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_October_2021.pdf, accessed October 24, 2022.

Municipal Operations Climate Action Plan

The City of Mountain View adopted its MOCAP in 2015 in order to present and evaluate mechanisms by which the City may achieve an emissions reduction target of 80 percent below 2005 levels by 2050. The MOCAP includes strategies that the City can implement to reduce emissions associated with its government operations. The proposed project is a new Public Safety Building that would replace the existing Mountain View Police Services - Fire Administration building. Because the proposed project would serve as a government building, an analysis for its consistency with the MOCAP strategies is presented in Table 4.5-3, *Consistency Analysis with the Municipal Operations Climate Action Plan*.

Table 4.5-3 Consistency Analysis with the Municipal Operations Climate Action Plan

Sector	Consistency Analysis
Facilities	
Strategy F-1: Low-Carbon Grid Electricity Procure Low-Carbon Grid Electricity through Utility Programs or Large-Scale Renewable Energy Development.	**Consistent.** While the proposed project is not directly applicable to the development/procurement of low-carbon electricity options, it would support this strategy by constructing all-electric buildings that comply with Building Energy Efficiency Standards, CALGreen, the Mountain View Code of Ordinances and the requirements for LEED Gold Certification. These project features associated with compliance with these codes would reduce electricity usage from the project as the City continues to seek low-carbon energy options with Silicon Valley Clean Energy, which would supply electricity to the proposed project.
Strategy F-2: Renewable/Low-Carbon Electricity Generation Develop Additional Renewable Energy Facilities	**Consistent.** Compliance with the Mountain View Code of Ordinances requires new non-residential construction to include rooftop PV installation to accommodate the load from all-electric buildings, consistent with this strategy's Action B to include PV installations at city buildings. The Ordinance Code also requires water heating systems to be all-electric or solar which would support Action B of this strategy, as applicable.
Strategy F-3: Existing Building Energy Retrofit and Management Reduce Energy Consumption in Existing Municipal Buildings through Energy Efficiency Improvements, Interactive Management Systems, Employee Education, and Building Operation and Maintenance Policies.	**Consistent.** The proposed project would not be involved with the actions that implement this strategy included the development of an energy efficiency fund, strengthening the City's energy efficiency procurement policy, and retro-commissioning program, but would generally support this strategy by implementing the energy reduction requirements in the City's Code of Ordinances and the applicable California Building Codes.
Strategy F-4: New Building Energy Performance Establish Energy Efficiency Targets for New Municipal Buildings.	**Consistent.** As discussed previously, the proposed project would be required to achieve LEED Gold Certification for the project buildings, thereby directly supporting this strategy.
Strategy F-5: Public Realm Lighting Efficiency Upgrade Public Realm Lighting to	**Consistent.** The proposed project would be required to comply with the California Energy Code which contains standards for high-efficacy lighting fixtures and lighting controls for non-residential buildings. The proposed

4.5 Greenhouse Gas Emissions

Table 4.5-3 Consistency Analysis with the Municipal Operations Climate Action Plan

More Efficient Technology.	project would therefore support the intent of this strategy by implementing energy efficient lighting.
Strategy F-6: Landscape Water Conservation Formalize Existing Landscape Conservation Practices into a Green Grounds Policy.	**Consistent.** This strategy refers to an effort to formally adopt a Greens Ground Policy by the City to better regulate the implementation of water conserving strategies. The proposed project would comply with the City's adopted water conservation policies including the water conservation landscaping regulations contained in Division 3, Article XI, in the City Zoning Code.
Vehicle Fleet	
Strategy VF-1: Efficient Vehicles Transition City Fleet to More Efficient Vehicles and Provide Operational Improvement Guidance	**Consistent.** The proposed project would not be directly involved with efforts to procure fuel efficient vehicles but would comply with and benefit from State and City policies that aim to increase fuel efficiency for vehicles.
Strategy VF-2: Alternative Fuel Vehicles Increase Use of Alternative Fueled Vehicles and Refueling Infrastructure.	**Consistent.** In compliance with the City's adoption of the CALGreen standards, the proposed project would implement the applicable CALGreen electric vehicle parking stall standards. Also, as described in Chapter 3, *Project Description*, the proposed project will include CALGreen Tier 2 parking standards; thereby, increasing access to alternative refueling infrastructure.
Strategy VF-3: Behavior/Fuel Optimization Encourage and Promote Fuel-Efficient Driving.	**Consistent.** As described in Section 4.8, *Transportation*, the increase in staff is not substantial and represents an approximately 8-percent increase from existing conditions. Therefore, implementation of the proposed project would generate a nominal increase in vehicle trips. However, because, even at maximum capacity, the new employees at the project site would be relocated from existing office space elsewhere in the city, the increase in trips would not represent net new trips for the city as a whole. This nominal increase in daily vehicle trips would not have a significant impact on VMT nor conflict with this strategy to reduce employee VMT.
Solid Waste	
Strategy SW-1: Waste Reduction Reduce Municipal Waste through Procurement Policies, Waste Diversion Goals, and Waste Stream Monitoring and Analysis.	**Consistent.** The proposed project would comply with the relevant requirements in the City's Energy Efficient Procurement Policy. It would also comply with the City's waste diversion programs and municipal code requirements per Chapter 16, *Garbage, Rubbish and Weeds*, of the Code of Ordinances.
Strategy SW-2: Recyclable Paper Reduction Reduce Paper Use in Municipal Operations.	**Consistent.** This strategy references the implementation of a paperless office policy for the City. Operation of the Public Safety Building would comply with this strategy to the extent possible.
Strategy SW-3: Landscape Waste Diversion Expand City Efforts in Landscape Waste Composting.	**Consistent.** The proposed project would comply with the provisions of SB 1383, the Short-Lived Climate Pollutant Reduction Act, as codified in the City Code of Ordinances in Article VI, Chapter 16. This includes requirements for composting at non-residential uses.

Table 4.5-3 Consistency Analysis with the Municipal Operations Climate Action Plan

Strategy SW-4: Construction and Demolition Waste Diversion Increase Construction and Demolition Waste Diversion Rates for Municipal Projects.	**Consistent.** Section 5.408 of CALGreen requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. This exceeds the City's 50 percent diversion noted in the MOCAP and the proposed project would comply with all applicable CALGreen standards.

Source: City of Mountain View, May 2015, Municipal Operations Climate Action Plan, https://www.mountainview.gov/home/showpublisheddocument/816/637940976800700000

Significance without Mitigation: Less than significant.

4.5.5 Cumulative Impact Analysis

Project-related GHG emissions are not confined to a particular air basin but are dispersed worldwide. Therefore, impacts under impact discussions (a) and (b) are not project-specific impacts to global warming, but the proposed project's contribution to this cumulative impact.

While the proposed project would contribute to short-term and long-term increases in GHG emissions, it would implement the BMPs established by the Air District for the purpose of achieving the State's climate goals. Compliance with these BMPs would reduce GHG impacts to a less-than-significant level for the proposed project. The proposed project is also consistent with other applicable state and local plans including the CABR 2022 Scoping Plan, Plan Bay Area 2050, and the City's MOCAP, as discussed in impact discussion (b). Therefore, cumulative GHG impacts of the proposed project would be **less than significant**.

4.5 Greenhouse Gas Emissions

This page is intentionally left blank.

4.6 HAZARDS AND HAZARDOUS MATERIALS

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for implementation of the proposed project to result in a significant hazards and hazardous materials impact. The analysis in this section is based in part on the following technical report:

> *Phase I Environmental Site Assessment, Mountain View Public Safety Building Project for SVA Architects*, PlaceWorks, June 2024

Complete copies of these studies are included in Appendix D, *Phase I Environmental Site Assessment*, of this Draft EIR.

As described in Chapter 2, *Introduction*, of this Draft EIR, the only significance criterion identified in the California Environmental Quality Act (CEQA) Guidelines that is evaluated in this chapter includes impacts associated with the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, this chapter only addresses this one issue.

4.6.1 Regulatory Background

Federal, State, and local laws, regulations, plans, or guidelines related to hazards and hazardous materials and potentially applicable to the proposed project are summarized below.

FEDERAL

United States Environmental Protection Agency

The United States Environmental Protection Agency (EPA) is the primary federal agency that regulates hazardous materials and waste. In general, the EPA works to develop and enforce regulations that implement environmental laws enacted by Congress. The agency is responsible for researching and setting national standards for a variety of environmental programs, delegating the responsibility for issuing permits, and monitoring and enforcing compliance to states and Native American tribes. EPA programs promote handling hazardous waste safely, cleaning up contaminated land, and reducing waste volumes through such strategies as recycling. California falls under the jurisdiction of EPA Region 9. Under the authority of the Resource Conservation and Recovery Act (RCRA) and in cooperation with State and tribal partners, the EPA Region 9 Waste Management and Superfund Divisions manage programs for site environmental assessment and cleanup, hazardous and solid waste management, and underground storage tanks.

4.6 Hazards and Hazardous Materials

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 protects water, air, and soil resources from the risks created by past chemical disposal practices. This law is also called the Superfund Act and regulates sites on the National Priority List, which are called Superfund sites. The act was intended to encompass the prevention of and response to uncontrolled hazardous substances releases. It provides mechanisms for reacting to emergencies and chronic hazardous material releases. In addition to procedures to prevent and remedy problems, it established a system for compensating appropriate individuals and assigning appropriate liability. It is designed to plan for and respond to failure in other regulatory programs and remedy problems resulting from action taken before the era of comprehensive regulatory protection.

STATE

California Unified Program Administration

In 1993, Senate Bill 1082 gave the California Environmental Protection Agency (CalEPA) the authority and responsibility to establish a unified hazardous waste and hazardous materials management and regulatory program, commonly referred to as the Unified Program. The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of environmental and emergency response programs. The Unified Program Administration and Advisory Group (UPAAG) was created to foster effective working partnerships between local, State and federal agencies. The UPAAG's goals and objectives are listed in the UPAAG Strategic Plan. The six programs are:

- Hazardous Materials Release Response Plans and Inventories (Business Plans)
- California Accidental Release Prevention Program
- Underground Storage Tank Program
- Aboveground Petroleum Storage Act Program
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs
- California Uniform Fire Code: Hazardous Material Management Plans and Hazardous Material Inventory Statements

The State agency partners involved in the Unified Program have the responsibility of setting program element standards, working with CalEPA on ensuring program consistency, and providing technical assistance to the certified unified program agencies. The following State agencies are involved with the Unified Program:

- **California Environmental Protection Agency.** The Secretary of the CalEPA is directly responsible for coordinating the administration of the Unified Program. The Secretary

certifies Certified Unified Program Agencies (CUPA). The Secretary has certified 83 CUPAs to date, which carry out the responsibilities previously handled by approximately 1,300 State and local agencies.

- **Department of Toxic Substances Control**. The Department of Toxic Substances Control (DTSC) provides technical assistance and evaluation for the hazardous waste generator program, including on-site treatment (tiered permitting).
- **Governor's Office of Emergency Services.** The Governor's Office of Emergency Services is responsible for providing technical assistance and evaluation of the Business Plan Program and the California Accidental Release Response Plan (CalARP) Programs.
- **Office of the State Fire Marshal.** The Office of the State Fire Marshal is responsible for ensuring the implementation of the Hazardous Material Management Plans and the Hazardous Material Inventory Statement Programs. These programs tie in closely with the Business Plan Program.
- **State Water Resources Control Board.** The State Water Resources Control Board provides technical assistance and evaluation for the underground storage tank program in addition to handling the oversight and enforcement for the aboveground storage tank program.

Under Division 4.5 of Title 22 of the California Code of Regulations (CCR) and the California Hazardous Waste Control Law (Health and Safety Code Division 20, Chapter 6.5), DTSC regulates the generation, transportation, treatment, storage, and disposal of hazardous waste. Both RCRA and the Hazardous Waste Control Law impose "cradle to grave" regulatory systems for handling hazardous waste in a manner that protects human health and the environment.

California Health and Safety Code and Code of Regulations

California Health and Safety Code Chapter 6.95 and 19 CCR Section 2729 set out the minimum requirements for business emergency plans and chemical inventory reporting. A business that uses hazardous materials or a mixture containing hazardous materials must establish and implement a business plan if the hazardous material is handled in certain quantities. These regulations require businesses to provide emergency response plans and procedures, training program information, and a hazardous material chemical inventory disclosing hazardous materials stored, used, or handled on-site.

California Health and Safety Code Section 25250.256 requires that every generator of used oil, other than the owner or operator of a used oil collection center, as defined in Section 48622 of the Public Resources Code (PRC), or a household hazardous waste collection facility, as defined in Health and Safety Code Section 25218.1, that transfers used oil to a recycling facility, shall submit a certification to the transporter that the used oil transferred meets the definition of used oil pursuant to Section 25250.1(a) of the Health and Safety Code. The certification shall

4.6 Hazards and Hazardous Materials

specifically state that the used oil does not contain polychlorinated biphenyls (PCBs) at a concentration of 5 parts per million (ppm), or greater, in accordance Health and Safety Code Section 25250.1(iv)(B)(1)(a).

California Code of Regulations, Title 22, Division 4.5

22 CCR Division 4.5 sets forth the requirements for hazardous waste generators; transporters; and owners or operators of treatment, storage, or disposal facilities. These regulations include the requirements for packaging, storage, labeling, reporting, and general management of hazardous waste prior to shipment. In addition, the regulations identify standards applicable to transporters of hazardous waste. These regulations specify the requirements for transporting loads of hazardous waste, including manifesting, vehicle registration, and accidental emergency discharges during transportation.

Hazardous Materials Disclosure Programs

The Unified Program administered by the State of California consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities for environmental and emergency management programs, which include Business Plans, the California Accidental Release Prevention Program, and the Underground Storage Tank (UST) Program. The Unified Program is implemented by CUPAs at the local government level.

The County of Santa Clara has four Certified United Program Agencies that administer hazardous materials, hazardous waste, and underground storage tank programs within their jurisdictions—Hazardous Materials Compliance Division of the Santa Clara County Department of Environmental Health (SCCEH) (for all areas of Santa Clara County other than the cities of Santa Clara, Gilroy, and Sunnyvale); Santa Clara City Fire Department; Gilroy Building, Life, and Environmental Safety to Community Development Department, Fire Prevention Division; and the Sunnyvale Department of Public Safety. Under the Unified Program, the four CUPAs consolidate, coordinate, and make consistent the administrative requirements, permits, inspection, and enforcement activities associated with several regulatory programs.[1]

Under an agreement with the County, the Mountain View Fire Department implements hazardous materials programs as a participating agency under the Unified Program.[2]

[1] Santa Clara County, Santa Clara County Multi-Jurisdictional Local Hazard Mitigation Plan, https://files.santaclaracounty.gov/exjcpb1566/2024-10/final-vol-i-santa-clara-county-mjhmp_7-26-2024.pdf ?VersionId=sJ_YNu0VIsDHH5dMOSdiwVAgC7Gl2P.Z.
[2] City of Mountain View, 2022, City of Mountain View Housing Element Update Draft Environmental Impact Report, page 4.8-15.

California Fire Code

The California Fire Code is contained in 24 CCR Part 9. The Code is updated every three years and includes provisions and standards for hazardous materials.

LOCAL

Mountain View 2030 General Plan

The Public Safety Element of the Mountain View 2030 General Plan provides information about risks in Mountain View from hazards and contains goals and policies designed to protect the community and its property from hazardous materials. The Mountain View 2030 General Plan policies relevant to the proposed project are listed in Table 4.6-1, *Mountain View 2030 General Plan Policies Relevant to Hazardous Materials and the Proposed Project*.

Table 4.6-1 Mountain View 2030 General Plan Policies Relevant to Hazardous Materials and the Proposed Project

Policy Number	Policy Text
Chapter 8, Public Safety (PSA) Element	
Policy PSA 3.2	*Protection from hazardous materials.* Prevent injuries and environmental contamination due to the uncontrolled release of hazardous materials through prevention and enforcement of fire and life safety codes.
Policy PSA 3.3	*Development review.* Carry out development review procedures that encourage effective identification and remediation of contamination and protection of public and environmental health and safety.
Policy PSA 3.4	*Oversight agencies.* Work with local, state and federal oversight agencies to encourage remediation of contamination and protection of public and environmental health and safety.

Source: City of Mountain View, 2012, *2030 General Plan.*

Mountain View Municipal Code

The City of Mountain View Municipal Code contains all ordinances for the city. The Municipal Code is organized by Chapter, Article, Division, and Section.

Chapter 24, *Hazardous Materials*, regulates hazardous materials and other regulated materials.

Division II, Materials Regulated, regulates materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a significant hazard if released into the workplace or the environment. Section 24.2.1, Exclusions, establishes minimum quantity exclusions for materials. Division VII, Applications and Permits, outlines provisions related to the permitting of the storage, use, and handling of hazardous materials in excess of the exempt amounts.

4.6 Hazards and Hazardous Materials

4.6.2 Existing Conditions

SITE HISTORY

Based on the review of historical and maps, the project site has been developed since at least 1897. No previous agricultural fields or farming activities were noted on the project other than historical packaging and warehousing facilities for agricultural products. Based on a search of the Santa Clara County Recorder's Office, the California Environmental Protection Agency, and the United States Environmental Protection Agency, there were no environmental liens or activity and use limitations identified for the project site. The project site has not been used as a site for mining operations, drug manufacturing, or any other potentially hazardous historical uses.[3]

Historical surrounding land uses include residential and light industrial uses (warehouses for the storage of agricultural products) starting around 1897.[4]

RECORDS REVIEW

The objective of the Phase I Environmental Site Assessment (ESA) prepared for the proposed project is to assess whether "recognized environmental conditions" (REC), historical RECs (HREC), and controlled RECs (CREC) are associated with the project site.

No RECs were identified related to activities on the project site. However, an REC was identified associated with former dry cleaners on adjacent properties; potential migration of soil vapors and/or groundwater from these properties creates a vapor encroachment condition (VEC) on the project site.[5] The Phase I ESA identified these sites as having potential tetrachloroethylene (also known as perchloroethylene or PCE) plumes within 100 feet of the project site and are listed below:[6]

- **Former Fremont Laundry (990 Villa Street).** This site is approximately 95 feet southeast of the project site and is identified on the DTSC's voluntary cleanup site (VCP) list and Site Mitigation and Brownfields Reuse Program (SMBRP) list. The facility has a land use covenant and has been certified by DTSC as having completed all response actions. However, ongoing maintenance and operation activities associated with the active subslab depressurization system occur on the site. The dry cleaner has not operated at the site since 1985, and the property is now developed as a two-story commercial building. However, because this

[3] PlaceWorks, 2024, *Phase I Environmental Site Assessment, Mountain View Public Safety Building Project for SVA Architects*, page 18.
[4] PlaceWorks, 2024, *Phase I Environmental Site Assessment, Mountain View Public Safety Building Project for SVA Architects*, page 19.
[5] PlaceWorks, 2024, *Phase I Environmental Site Assessment, Mountain View Public Safety Building Project for SVA Architects*, pages 1 to 2.
[6] PlaceWorks, 2024, *Phase I Environmental Site Assessment, Mountain View Public Safety Building Project for SVA Architects*, pages 26, 30, 36, and 37.

facility is upgradient from the project site, it is considered to be an REC due to the possibility of vapor migration onto the project site. This is a potential vapor encroachment issue is considered to be an REC.

- **Former Evelyn Avenue Parking Lot (southeast corner of Evelyn Avenue and Franklin Street).** This site is approximately 150 feet east-southeast of the project site and is identified on DTSC's VCP list. The site previously contained a parking lot and is now developed with a multi-family building. Although the facility received a "no further action" determination in 2009 by DTSC, because the property is upgradient from the project site and there is contamination of groundwater beneath the property with potential vapor migration onto the project site, this is considered to be an REC.

Although these off-site facilities have been investigated and remediated, the off-site extent of the soil vapor and/or groundwater plumes westward toward the project site has not been investigated, and subsequent investigation of the adjacent property to the east showed migration of soil vapors onto that property. Therefore, the Phase I ESA recommends further analysis (through a Phase II ESA) to determine if the project site has been impacted by vapor concentrations and/or groundwater concentrations in excess of commercia land use screening levels. More information regarding these sites and other results of the records search are available in the Phase I ESA (see Appendix D, *Phase I Environmental Site Assessment*, of this Draft EIR).

The Phase I ESA does not identify any HRECs or CRECs in connection with the project site.

4.6.3 Significance Criteria

The Initial Study prepared for this Draft EIR (see Appendix A, *Notice of Preparation, Initial Study, and Scoping Comments*) identified that the proposed project would not result in a significant impact for the following significance criteria:

- Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- 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 or excessive noise for people residing or working in the project area?

4.6 Hazards and Hazardous Materials

- Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The proposed project would have a significant impact under Appendix G, *Environmental Checklist Form*, of the California Environmental Quality Act (CEQA) Guidelines if it would:

a) 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.

4.6.4 Project Impact Analysis

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts.

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

Hazardous materials during construction could potentially include fuels, lubricants, greases, and coatings. After construction, the use of hazardous materials could contain cleaning solvents, fertilizers, pesticides, and other materials used in the regular maintenance and operation of the proposed uses. An accidental release of any of these materials could pose a health hazard to the public. Existing laws, regulations, policies, and procedures that would serve to prevent the release of hazardous materials include applicable federal, State, and local laws and regulations described in Section 4.6.1, *Regulatory Background*, of this section. Compliance with these existing laws, regulations, policies, and procedures would help to ensure that future development activities would not create a significant hazard to the public.

The project site may be impacted by soil vapors and/or groundwater due to the migration of dry cleaning chemicals (primarily PCE) from nearby properties to the east that formerly contained dry cleaning operations.

According to the Phase I ESA prepared for the proposed project, the former Fremont Laundry site at 990 Villa Street has had measured indoor air concentrations in excess of DTSC commercial/industrial carcinogenic screening levels, groundwater concentrations above maximum contaminant levels (MCLs), and maximum concentrations in soil vapor of 200,000 micrograms per cubic meter (ug/m^3). The 990 Villa Street site has a land use restriction and is being regulated by DTSC, with ongoing maintenance and operation of an active sub-slab

depressurization system. Annual reports indicate that the sub-slab depressurization system is working in accordance with permit requirements. However, it is not known if soil vapors migrated onto the project site prior to the installation of the sub-slab depressurization system, and no known off-site investigation of soil vapors or groundwater concentrations to the west (i.e., in the direction of the project site) has been conducted. Soil vapor concentrations along the western edge of the property, within 100 feet of the project site, had PCE concentrations of 12,000 ug/m^3.

In addition, the Evelyn Avenue parking lot site has had measured PCE groundwater concentrations up to 230 micrograms per liter (ug/l) and soil vapor concentrations up to 13,000 ug/m^3 at locations along the western portion of the site. The site previously contained a parking lot and is now developed with a multi-family building. DTSC issued a no further action letter in 2009 based on the enhanced ventilation of the below-grade garage. However, no off-site investigation was conducted at this property, and it is unknown whether soil vapors and/or groundwater may have migrated to the west (i.e., toward or onto the project site).

The proposed project involves on-site construction activities that could expose workers to subsurface hazards. In addition, the proposed project involves an increase in the occupancy of the project site (due to the proposed increase in on-site employment), which would expose additional people to potential hazards when compared to existing conditions. Therefore, without further investigation, the proposed project has the potential to exacerbate existing hazards associated with these off-site hazardous materials sites. Therefore, the impact would be *significant*.

Impact HAZ-1: The construction activities and increased site occupancy involved in the proposed project could exacerbate an existing hazard associated with the release of hazardous materials originating from off-site land uses.

> **Mitigation Measure HAZ-1:** Prior to issuance of demolition or grading permits, shallow soil samples and groundwater samples shall be taken in the near surface soil and tested for tetrachloroethylene to determine if contaminants from previous operations on the former Fremont Laundry or Evelyn Avenue parking lot sites are present at concentrations above established regulatory construction worker safety and commercial environmental screening levels. The results of the soil sampling and testing must be provided to the City of Mountain View Community Development Department.
>
> If contaminated soils or groundwater are found in concentrations above the appropriate regulatory environmental screening levels for the proposed project, the project sponsor shall obtain regulatory oversight from the Santa Clara County Department of Environmental Health, Department of Toxic Substances Control, or Regional Water Quality Control Board to mitigate the contamination found. A Site Management Plan (SMP), Removal Action Plan (RAP), or equivalent document must be prepared by a

qualified hazardous materials consultant. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety and the health of future workers and visitors to the project site during operation of the proposed project. Evidence of regulatory oversight and a regulatory approved plan shall be provided to the City of Mountain View Community Development Department.

In the event that vapor encroachment is discovered, the proposed project shall develop a vapor management plan. The vapor management plan shall be prepared in consultation with applicable regulatory agencies, including the Department of Toxic Substances Control and the Regional Water Quality Control Board, and shall be reviewed and accepted by the City of Mountain View prior to the issuance of demolition and grading permits.

Significance with Mitigation: Less than significant.

4.6.5 Cumulative Impact Analysis

This analysis considers potential impacts of the proposed project when considered along with the potential impacts of the cumulative development projects listed in Table 4-1, *Cumulative Projects List*. Other projects would use, store, transport, and dispose of increased amounts of hazardous materials and thus could pose substantial risks to the public and the environment.

The City's 2030 General Plan EIR identifies a less-than-significant impact with the implementation of standard mitigation measures and development conditions to reduce the potential for contamination associated with hazardous materials in areas adjacent to highways or previously used for agriculture or industrial uses. Future development in the city would be subject to environmental review, as applicable, to mitigate any significant hazards and hazardous materials impacts. The use, storage, transport, and disposal of hazardous materials by other projects would conform with regulations of the multiple agencies described in Section 4.6.1, *Regulatory Background*. Cumulative impacts would be *less than significant* with compliance with such regulations and procedures.

Significance without Mitigation: Less than significant.

4.7 NOISE

This section of the Draft Environmental Impact Report (EIR) describes the regulatory framework and existing conditions related to noise sources and the overall noise environment in the vicinity of the proposed project, evaluates the potential impacts that could occur from development of the proposed project, and details mitigation measures needed to reduce significant impacts.

The technical data and modeling used for this analysis are in Appendix E, *Noise Data*, of this Draft EIR.

Noise and Vibration Fundamentals

Noise is defined as unwanted sound and, when overexposed, is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Although sound can be easily measured, the perception of noise and the physical response to sound complicate the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as "noisiness" or "loudness." Following are brief definitions of terminology used in this section.

- **Sound.** A disturbance created by a vibrating object, which when transmitted by pressure waves through a medium such as air, is capable of being detected by the human ear or a microphone.
- **Noise.** Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
- **Decibel (dB).** A unitless measure of sound on a logarithmic scale.
- **A-Weighted Decibel (dBA).** An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- **Equivalent Continuous Noise Level (L_{eq}).** The mean of the noise level, energy averaged over the measurement period.
- **L_{max}.** The maximum root-mean-square noise level during a measurement period.
- **Statistical Sound Level (L_n).** The sound level that is exceeded "n" percent of time during a given sample period. For example, the L_{50} level is the statistical indicator of the time-varying noise signal that is exceeded 50 percent of the time (during each sampling period), meaning that half of the sampling time, the changing noise levels are above this value and half of the time they are below it. This is called the "median sound level." The L_{10} level, likewise, is the value that is exceeded 10 percent of the time (i.e., near the maximum) and this is often known as the "intrusive sound level." The L_{90} is the sound level exceeded 90 percent of the time and is often considered the "effective background level" or "residual noise level."

4.7 Noise

- **Day-Night Sound Level (L_{dn} or DNL).** The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the sound levels occurring during the period from 10:00 pm to 7:00 am.
- **Community Noise Equivalent Level (CNEL).** The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added to the levels occurring during the period from 7:00 pm to 10:00 pm, and 10 dB added to the sound levels occurring during the period from 10:00 pm to 7:00 am. Note: For general community/environmental noise, CNEL and L_{dn} values rarely differ by more than 1 dB. As a matter of practice, L_{dn} and CNEL values are considered to be equivalent/interchangeable and are treated as such in this assessment.
- **Peak Particle Velocity (PPV).** The peak rate of speed at which soil particles move (e.g., inches per second) due to ground vibration.
- **Sensitive Receptor.** Noise- and vibration-sensitive receptors include land uses where quiet environments are necessary for enjoyment and public health and safety. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, and nursing homes are examples.
- **Vibration Decibel (VdB).** A unitless measure of vibration, expressed on a logarithmic scale and with respect to a defined reference vibration velocity. In the U.S., the standard reference velocity is 1 micro-inch per second ($1x10^{-6}$ in/sec).

SOUND FUNDAMENTALS

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in Hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the loudness of sound is the decibel. The human ear is not equally sensitive to all frequencies. Sound waves below 16 Hz are not heard at all and are “felt” more like a vibration. Similarly, while people with extremely sensitive hearing can hear sounds as high as 20,000 Hz, most people cannot hear above 15,000 Hz. In all cases, hearing acuity falls off rapidly above about 10,000 Hz and below about 200 Hz. Since the human ear is not equally sensitive to sound at all frequencies, a special frequency dependent rating scale is usually used to relate noise to human sensitivity. The A-weighted decibel scale performs this compensation by weighting frequencies in a manner approximating the sensitivity of the human ear.

Changes of 1 to 3 dBA are detectable under quiet, controlled conditions and changes of less than 1 dBA are usually indiscernible. A 3 dBA change in noise levels is considered the minimum change that is detectable with human hearing in outside environments. A change of 5 dBA is readily discernable to most people in an exterior environment whereas a 10 dBA change is perceived as a doubling (or halving) of the sound.

4.7 Noise

Noise is defined as unwanted sound, and, when overexposed, is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the federal government, the State of California, and many local governments have established criteria to protect public health and safety and to prevent disruption of certain human activities.

SOUND MEASUREMENT

Sound pressure is measured through the A-weighted measure to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies.

Unlike linear units such as inches or pounds, decibels are measured on a logarithmic scale, representing points on a sharply rising curve. An increase of 10 dBA is 10 times more intense than 1 dBA, 20 dBA is 100 times more intense, and 30 dBA is 1,000 times more intense. A sound as soft as human breathing is about 10 times greater than 0 dBA. The decibel system gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. Ambient sounds generally range from 30 dBA (very quiet) to 100 dBA (very loud).

The decibel level of sound decreases as the distance from the sound source increases. Sound dissipates exponentially with distance from the noise source. This phenomenon is known as "spreading loss." For a single point source, sound levels decrease by approximately 6 dBA for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by on-site operations from stationary equipment or activity at a project site. If noise is produced by a line source, such as highway traffic, the sound decreases by 3 dBA for each doubling of distance in a hard-site environment. Line source noise in a relatively flat environment with absorptive vegetation decreases by 4.5 dBA for each doubling of distance.

Time variation in noise exposure is typically expressed in a steady-state energy level equal to the energy content of the time varying period (called L_{eq}) or, alternately, as a statistical description of the sound level exceeded over some fraction of an observation period. These "Ln" values are typically used to demonstrate compliance with a noise ordinance for stationary sources. Other values typically noted during a noise survey are L_{min} and L_{max}, which represent the minimum and maximum root-mean-square noise levels over a measurement period.

Because community receptors are more sensitive to unwanted noise intrusion during the evening and night, State and local laws require that an artificial dBA increment be added to quiet time noise levels in a 24-hour noise descriptor called the CNEL or DNL.

PSYCHOLOGICAL AND PHYSIOLOGICAL EFFECTS OF NOISE

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects our entire system, with prolonged noise exposure in

4.7 Noise

excess of 75 dBA increasing body tensions, thereby affecting blood pressure, functions of the heart, and the nervous system. Extended periods of noise exposure above 90 dBA can result in permanent hearing damage. When the noise level reaches 120 dBA, even short-term exposure causes a tickling sensation in the ear, called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation becomes painful, called the threshold of pain. Table 4.7-1, *Typical Noise Levels*, shows typical noise levels from familiar noise sources.

Table 4.7-1 Typical Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Onset of physical discomfort	120+	
	110	Rock band (near amplification system)
Jet flyover at 1,000 feet		
	100	
Gas lawn mower at 3 feet		
	90	
Diesel truck at 50 feet, at 50 mph		Food blender at 3 feet
	80	Garbage disposal at 3 feet
Noisy urban area, daytime		
	70	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet
Heavy traffic at 300 feet	60	
		Large business office
Quiet urban daytime	50	Dishwasher, next room
Quiet urban nighttime	40	Theater or large conference room (background)
Quiet suburban nighttime		
	30	Library
Quiet rural nighttime		Bedroom at night or concert hall (background)
	20	
		Broadcast/recording studio
	10	
Lowest threshold of human hearing	0	Lowest threshold of human hearing

Source: California Department of Transportation, 2013.
Note: dBA = A-Weighted Decibel

VIBRATION FUNDAMENTALS

Vibration is an oscillating motion in the earth. Like noise, vibration is transmitted in waves, but through the earth or solid objects. Unlike noise, vibration is typically of a frequency that is felt rather than heard.

Vibration can be natural—such as earthquakes, volcanic eruptions, or landslides—or human-caused, such as explosions, heavy machinery, or trains. Both natural and human-caused vibration may be continuous, such as from operating machinery, or impulsive, as from an explosion.

As with noise, vibration can be described by both its amplitude and frequency. Amplitude can be characterized in three ways—displacement, velocity, and acceleration. Particle displacement is a measure of the distance that a vibrated particle travels from its original position; for the purposes of soil displacement, it is typically measured in inches or millimeters. Particle velocity is the rate of speed at which soil particles move in inches per second or millimeters per second. Table 4.7-2 presents the human reaction to various levels of peak particle velocity.

Table 4.7-2 Human Reaction to Typical Vibration Levels

Vibration Level Peak Particle Velocity (in/sec)	Human Reaction	Effect on Buildings
0.006–0.019	Threshold of perception, possibility of intrusion	Vibrations unlikely to cause damage of any type
0.08	Vibrations readily perceptible	Recommended upper level of vibration to which ruins and ancient monuments should be subjected
0.10	Level at which continuous vibration begins to annoy people	Virtually no risk of “architectural” (i.e., not structural) damage to normal buildings
0.20	Vibrations annoying to people in buildings	Threshold at which there is a risk to “architectural” damage to normal dwelling—houses with plastered walls and ceilings
0.4–0.6	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic, but would cause “architectural” damage and possibly minor structural damage

Source: California Department of Transportation, 2013.

Vibrations also vary in frequency, and this affects perception. Typical construction vibrations fall in the 10 to 30 Hz range and usually occur around 15 Hz. Traffic vibrations exhibit a similar range of frequencies; however, due to their suspension systems, buses often generate frequencies

around 3 Hz at high vehicle speeds. It is less common, but possible, to measure traffic frequencies above 30 Hz.

The way in which vibration is transmitted through the earth is called propagation. As vibration waves propagate from a source, the energy is spread over an ever-increasing area such that the energy level striking a given point is reduced with the distance from the energy source. This geometric spreading loss is inversely proportional to the square of the distance. Wave energy is also reduced with distance as a result of material damping in the form of internal friction, soil layering, and void spaces. The amount of attenuation provided by material damping varies with soil type and condition as well as the frequency of the wave.

4.7.1 Regulatory Background

To limit population exposure to physically and/or psychologically damaging as well as intrusive noise levels, the federal government, the State of California, and local governments have established standards and ordinances to control noise.

FEDERAL

Federal Highway Administration

Proposed federal or federal-aided highway construction projects at a new location, or the physical alteration of an existing highway that significantly changes the horizontal or vertical alignment or increases the number of through-traffic lanes, require an assessment of noise and consideration of noise abatement per 23 CFR Part 772, *Procedures for Abatement of Highway Traffic Noise and Construction Noise*. The Federal Highway Administration (FHWA) has adopted noise abatement criteria for sensitive receivers—such as picnic areas, recreation areas, playgrounds, active sport areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals—when "worst-hour" noise levels approach or exceed 67 dBA L_{eq} (FHWA 1978).

U.S. Environmental Protection Agency

In addition to FHWA standards, the U.S. Environmental Protection Agency (USEPA) has identified the relationship between noise levels and human response. The USEPA determined that over a 24-hour period, an L_{eq} of 70 dBA will result in some hearing loss. Interference with activity and annoyance will not occur if exterior levels are maintained at an L_{eq} of 55 dBA and interior levels at or below 45 dBA. These levels are relevant to planning and design and useful for informational purposes, but they are not land use planning criteria because they do not consider economic cost, technical feasibility, or the needs of the community; therefore, they are not mandated.

The USEPA also set 55 dBA L_{dn} as the basic goal for exterior residential noise intrusion. However, other federal agencies, in consideration of their own program requirements and goals, as well

as the difficulty of actually achieving a goal of 55 dBA L_{dn}, have settled on the 65 dBA L_{dn} level as their standard. At 65 dBA L_{dn}, activity interference is kept to a minimum, and annoyance levels are still low. It is also a level that can realistically be achieved.

U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) has set the goal of 65 dBA L_{dn} as a desirable maximum exterior standard for residential units developed with HUD funding (This level is also generally accepted within the State of California.) Although HUD does not specify acceptable interior noise levels, standard construction of residential dwellings typically provides 20 dBA or more of attenuation with the windows closed. Based on this premise, the interior L_{dn} should not exceed 45 dBA.

Occupational Health and Safety Administration

The federal government regulates occupational noise exposure common in the workplace through the Occupational Health and Safety Administration (OSHA) under the USEPA. Noise limitations would apply to the operation of construction equipment and could also apply to any proposed industrial land uses. Noise exposure of this type is dependent on work conditions and is addressed through a facility's Health and Safety Plan, as required under OSHA, and is therefore not addressed further in this analysis.

STATE

General Plan Guidelines

The State of California, through its General Plan Guidelines, discusses how ambient noise should influence land use and development decisions and includes a table of normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable uses at different noise levels, expressed in CNEL (OPR 2017). A conditionally acceptable designation implies new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use and needed noise insulation features are incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements. The General Plan Guidelines provide cities and counties with recommended community noise and land use compatibility standards that can be adopted or modified at the local level based on conditions and types of land uses specific to that jurisdiction.

California Building Code

The California Building Code (CBC) is Title 24 of the California Code of Regulations. CBC Part 2, Volume 1, Chapter 12, Section 1206.4, *Allowable Interior Noise Levels*, requires that interior noise levels attributable to exterior sources not exceed 45 dBA in any habitable room. The noise

4.7 Noise

metric is evaluated as either the L_{dn} or the CNEL, whichever is consistent with the noise element of the local general plan.

The State's noise insulation standards for non-residential uses are codified in the California Code of Regulations, Title 24, *Building Standards Administrative Code*, Part 11, *California Green Building Standards Code* (CALGreen). CALGreen noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. Proposed projects may use either the prescriptive method (Section 5.507.4.1) or the performance method (Section 5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows when within a noise environment of 65 dBA CNEL or higher. Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA $L_{eq(1hr)}$.

Airport Noise Standards

California Code of Regulations Title 21, Subchapter 6, *Airport Noise Standards*, establishes 65 dBA CNEL as the acceptable level of aircraft noise for persons living in the vicinity of airports. Noise-sensitive land uses are generally incompatible in locations where the aircraft exterior noise level exceeds 65 dBA CNEL, unless an aviation easement for aircraft noise has been acquired by the airport proprietor or the residence is a high-rise with an interior CNEL of 45 dBA or less in all habitable rooms and has an air circulation or air conditioning system, as appropriate. Assembly Bill (AB) 2776 requires any person who intends to sell or lease residential properties in an airport influence area to disclose that fact to the person buying the property

LOCAL

The City of Mountain View General Plan Noise Element discusses the effects of noise exposure on the population and sets policies designed to protect residents from excessive and persistent noise intrusions. Policy NOI 1.7: Stationary Sources, restricts noise levels from stationary sources through enforcement of the Noise Ordinance and will only apply to long-term operational noise.

The City of Mountain View Code of Ordinances that apply to the project are as follows.

Construction Noise Standards

Under Section 8.70, Construction Noise, the hours allowed for construction are stated below:

> No construction activity shall commence prior to 7:00 a.m. nor continue later than 6:00 p.m., Monday through Friday. No work is permitted on Saturday unless prior written approval is granted by the chief building official. The term "construction activity" shall include any physical activity on the construction site or in the staging area, including the

delivery of materials. In approving modified hours, the chief building official may specifically designate and/or limit the activities permitted during the modified hours. No construction activity is allowed on Sunday or recognized holidays.

Stationary Noise Standards

Under Section 21.26, Stationary equipment noise, the noise limits for stationary equipment (such as heating, ventilation, and air conditioning mechanical systems, and air compressors). are stated below:

No person shall own or operate on any property any stationary equipment, such as, but not limited to, air compressors, equipment for swimming pools, spas, or air conditioners, which produces a sound level exceeding 55 dB(A) (50 dB(A) during the night, 10 p.m. to 7 a.m.) when measured at any location on any receiving residentially used property.

4.7.2 Existing Conditions

The dominant community noise sources in the project area are Caltrain railroad train pass-bys and the Central Expressway traffic. Noise associated with local surface streets, existing Mountain View Police Department operations, and neighborhood activities also make up the noise environment at the project site. Based on the Mountain View 2030 General Plan Figure 7.3, *Noise Contours 2030*, the project site lies within the 65 dBA to 70 dBA CNEL noise contours attributable to Caltrain railroad pass-bys and Central Expressway traffic.

4.7.3 Significance Criteria

The Initial Study prepared for this Draft EIR (see Appendix A, *Notice of Preparation, Initial Study, and Scoping Comments*) identified that the proposed project would not result in a significant impact for the following significance criterion:

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

Appendix G, *Environmental Checklist Form*, of the California Environmental Quality Act Guidelines states that the proposed project would result in a significant noise impact if it would:

a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

b) Generate excessive groundborne vibration or groundborne noise levels.

4.7 Noise

CONSTRUCTION NOISE AND VIBRATION THRESHOLDS

The City does not have specific limits or thresholds for construction noise. Therefore, the Federal Transit Administration (FTA) construction noise criterion of 80 dBA $L_{eq(8hr)}$ is used in this analysis to assess construction noise impacts at sensitive receptors.

STATIONARY NOISE THRESHOLDS

The project would have a significant impact if operational stationary noise sources exceed the City of Mountain View equipment noise standards of 55 dB(A) (50 dB(A) during the night, 10 p.m. to 7 a.m.).

TRANSPORTATION NOISE THRESHOLDS

A project will normally have a significant effect on the environment related to noise if it would substantially increase the ambient noise levels for adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA are detectable under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an exterior environment. Based on this, the following thresholds of significance, similar to those recommended by the FAA, are used to assess traffic noise impacts at sensitive receptor locations. A significant impact would occur if the traffic noise increase would exceed:

- 1.5 dBA in ambient noise environments of 65 dBA CNEL and higher
- 3 dBA in ambient noise environments of 60 to 64 dBA CNEL
- 5 dBA in ambient noise environments of less than 60 dBA CNEL

VIBRATION THRESHOLDS

The City does not have specific limits or thresholds for construction vibration. Therefore, the recommended criteria by the FTA for vibration damage shown in Table 4.7-4 are used in this analysis.

4.7.4 Project Impact Analysis

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts.

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

Construction Vehicles

The City does not have specific limits or thresholds for construction noise; to provide for a conservative and quantified assessment of potential construction noise impacts, this analysis uses the FTA-recommended criterion of 80 dBA $L_{eq(8hr)}$ for residential uses to evaluate project construction noise impacts.

Construction activity, including worker, material delivery, and large equipment delivery trips to and from the project site, would temporarily increase noise levels along local site access roadways. Individual construction vehicle and haul trucks may create momentary noise levels of up to approximately 85 dBA (L_{max}) at 50 feet from the vehicle. These occurrences would generally be infrequent and short in duration. Construction generates temporary trips from workers, vendors, and haul trucks. The period during which building construction, paving, and architectural coating phases would overlap is anticipated to generate the most trips, with an estimated total of 120 per day. The existing traffic volume on South Shoreline Boulevard is 23,500 daily trips.[1] The addition of 120 trips when compared to the existing traffic volumes in the vicinity of the proposed project would result in a noise increase of approximately 0.1 dBA Ldn or less. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions; changes of 1 to 3 dBA are detectable under quiet, controlled conditions; and changes of less than 1 dBA are usually indiscernible. Therefore, the increase of 0.1 dBA L_{dn} would not be noticeable and noise impacts from construction vehicles would therefore be *less than significant*.

Construction Equipment

Noise generated during construction is based on the number and type of equipment used, the load and power requirements to accomplish tasks for each construction phase, and the timing and duration of the noise-generating activities. The extent to which construction noise affects receptors varies based on factors such as noise attenuation due to distance, the ambient noise environment, and the location of the construction activity in relation to the receptor (such as intervening barriers and topography). Each phase of construction involves the use of different kinds of construction equipment and therefore has its own distinct noise characteristics. Noise levels from construction activities are dominated by the loudest piece of construction equipment. The dominant noise source is typically the engine, although intermittent events (such as dropping of materials) can also be noticeable. Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of 85 dBA or greater at 50 feet. Because

[1] City of Mountain View, 2012, *City of Mountain View Draft 2030 General Plan and Greenhouse Gas Reduction Program EIR.*

4.7 Noise

noise from construction equipment is intermittent and diminishes at a rate of 6 dBA per doubling distance, the average noise levels at noise-sensitive receptors would be lower, because mobile construction equipment would move around the site with different loads and power requirements.

Using information provided by the City of Mountain View and methodologies and inputs employed in the air quality assessment, the RCNM was used to model construction noise from each of the major phases. Construction activities associated with the proposed project would not require blasting or pile driving. During building construction, a bore/drill rig is proposed for the building foundations. Since the RCNM calculations do not account for shielding due to intervening buildings and structures, ground effects, or air absorption, the results of these calculations are conservative (that is, they represent a reasonable worst-case scenario). Table 4.7-5, *Project-Related Construction Noise*, summarizes the estimated construction noise levels for each construction phase at a distance of 50 feet.

Table 4.7-5 Project-Related Construction Noise

Construction Activity Phase	RCNM Reference Noise Level at 50 ft (dBA L_{eq})	Residences to the South at 130 ft (dBA L_{eq})	Residences to the West at 100 ft (dBA L_{eq})	Residences to the East at 115 ft (dBA L_{eq})
Demolition	85	77	79	78
Site Preparation	83	75	77	76
Grading	85	77	79	78
		at 120 ft	**at 125 ft**	**at 160 ft**
Building Construction	83	75	75	73
Architectural Coating	74	66	66	64
		at 205 ft	**at 110 ft**	**at 95 ft**
Paving	83	71	76	77

Source: PlaceWorks, 2024, Construction Noise Modeling (see Appendix E, *Noise Data*).
Notes: Noise levels rounded to the nearest decibel.

The City has not established quantified noise limits for temporary construction activities; this analysis uses the FTA-recommended noise level limit of 80 dBA $L_{eq(8hr)}$ for residential receptors to assess construction noise impacts. As shown in Table 4.7-5, construction levels would range between 64 dBA L_{eq} to 79 dBA L_{eq} at adjacent residential uses during all phases of construction activity and would not exceed the daytime 80 dBA $L_{eq(8\text{-}hr)}$ threshold. However, project construction noise levels would generate a substantial temporary increase of up to +9 dBA over ambient noise levels at surrounding noise sensitive uses. Therefore, this impact is considered **significant**.

Impact NOI-1: The proposed project would generate a substantial temporary increase in ambient noise levels during construction.

Mitigation Measure NOI-1: The project sponsor shall incorporate the following practices into the construction contract specifications to be implemented by the construction contractor during the entire construction phase of the project. The project sponsor and contractors shall prepare a Construction Noise Control Plan that includes the following measures:

- Limit construction to the hours of 8:00 a.m. to 6:00 p.m., Monday through Friday, and between 9:00 a.m. to 5:00 p.m. on weekends.
- Construct temporary noise barriers, where feasible, to screen receptors to the west, south, and east from the construction area. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps.
- At least 21 days prior to the start of construction activities, property owners within a 500-foot radius of the project site shall be notified of the planned construction. The notification shall include a brief description of the project, a description of the construction phases to occur, the construction hours noted above, and the overall construction duration. The notification shall include the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint.
- At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, they shall investigate, take appropriate corrective action, and report the action to the City.
- Prior to the start of construction, the project sponsor shall retain a qualified acoustical consultant to conduct construction noise monitoring during the major phases of project construction at select locations in the surrounding neighborhood. The number and location of monitoring positions, and the construction phases during which monitoring shall occur, shall be determined by City staff in consultation with the acoustical consultant. All sound level meters used during monitoring shall satisfy the American National Standards Institute (ANSI) standard of Type 1 instrumentation. All measurements shall be at least 5 feet above the ground and

away from reflective surfaces. The noise monitoring data and results shall be submitted in a memorandum to the City on a weekly basis during the construction phases requiring monitoring, along with comparison to the 80 dBA Leq (8-hr) construction noise limit. If exceedances of the construction noise limit are found, the applicant's construction contractor shall modify construction techniques and equipment to reduce the construction noise below the 80 dBA Leq (8-hr) limit.

- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. The signs shall note that all other equipment shall be turned off if not in use for more than 5 minutes. The construction manager shall be responsible for enforcing these noise reduction requirements.
- Construction trucks and equipment shall utilize the best available noise control techniques including improved mufflers, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible.
- The contractor shall use impact tools that are hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
- Stationary noise sources (e.g., generators and air compressors) shall be located as far from sensitive receptors as possible, and they shall be muffled and enclosed within temporary sheds, insulation barriers, or other measures to reduce noise levels to the extent feasible.
- Stockpiling of materials shall be located as far as feasible from nearby noise-sensitive receptors.
- During the entire active construction period, the use of noise-producing signals—including horns, whistles, alarms, and bells—shall be for safety warning purposes only. The construction manager shall require the use of smart back-up alarms on equipment. (These devices automatically adjust the alarm level based on the background noise level.) Alternately, equipment back-up alarms may be turned off and replaced with human spotters in compliance with all safety requirements and laws.

Significance with Mitigation: Less than significant. With implementation of Mitigation Measure NOI-1, particularly the use of equipment silencers and mufflers, construction noise would be

reduced by up to 10 dBA.[2] With Mitigation Measure NOI-1, construction noise levels are estimated to be 69 dBA $L_{eq(8\text{-}hr)}$ or less, which would not generate a substantial temporary increase over ambient noise levels at surrounding noise sensitive uses.

Operational Sources

Operational noise sources associated with the proposed project would be similar to existing operational noise and would include vehicles parking, K-9 training, and heating, ventilation, and air conditioning (HVAC) units. The proposed indoor shooting range would be a new use and would follow industry standards and regulations to address noise, reverberation, and echoes. The project would add new sources of stationary HVAC noise for the new building, but these would be comparable or quieter than other, similar sources at the existing building and would not result in notable changes at adjacent residential uses. The number of parking spaces would increase from existing conditions with the implementation of the project and its addition of a parking garage and surface parking expansion. Overall parking noise would be similar to existing conditions. Based upon previous noise measurements conducted, the single event noise level (SEL) attributable to a parking event is 71 dB SEL at 50 feet. To quantify the parking noise level for proposed parking spaces adjacent to the existing nearby residential uses, a conservative approach to the number of parking events occurring in a peak hour is applied. Assuming that each parking space adjacent to the existing residential uses were to fill and empty during the peak hour, the noise level is predicted to be 43 dB L_{eq} at residential uses west of the northeast surface parking expansion and 44 dB L_{eq} at residential uses to the south of the central parking expansion to a noise level of 43 dBA $L_{eq.}$ Operational noise sources would be similar to existing conditions and would not exceed the City's daytime and nighttime stationary noise standards of 55 dBA L_{eq} and 50 dBA L_{eq}, respectively. Therefore, no significant permanent stationary source noise increases would occur and operational impacts would be **less than significant**.

b) Would the proposed project generate excessive groundborne vibration or groundborne noise levels?

Increases in groundborne vibration levels attributable to the proposed project would be associated with construction-related activities. Construction on the project site would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. The effect on buildings in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight

[2] Federal Highway Administration, *Special Report – Measurement, Prediction, and Mitigation*, https://www.fhwa.dot.gov/ENVIRonment/noise/construction_noise/special_report/hcn04.cfm, accessed March 4, 2022.

damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

Table 4.7-6, *Construction Equipment Vibration Levels for Architectural Damage*, identifies vibration levels for typical construction equipment at a reference distance of 25 feet and to varying distances of adjacent residential uses, which is the estimated distance from construction equipment activity to the closest structures to the project. The Municipal Code does not have quantified limits for potential architectural damage from construction vibration. However, the FTA provides criteria for acceptable levels of groundborne vibration for various types of buildings and structures.[3] This analysis uses a threshold of 0.2 inches per second (in/sec) peak particle velocity (PPV) for non-engineered timber and masonry buildings to apply to the surrounding residential structures. As shown in Table 4.7-6, based on FTA data, vibration velocities from typical heavy construction equipment operations that would be used during project construction, including drilling during building construction for foundations, would range from 0.003 to 0.21 in/sec PPV at 25 feet from the source of activity.

Table 4.7-6 Construction Equipment Vibration Levels for Architectural Damage

Equipment	Approximate PPV at 25 feet (in/sec)	Residences to the South Approximate PPV at 80 feet (in/sec)	Residences to the West Approximate PPV at 35 feet (in/sec)	Residences to the East Approximate PPV at 70 feet (in/sec)
Vibratory Roller	0.21	0.037	0.127	0.045
Large Bulldozer	0.089	0.016	0.054	0.019
Loaded Trucks	0.076	0.013	0.046	0.016
Jackhammer	0.035	0.006	0.021	0.007
Small Bulldozer	0.003	0.001	0.002	0.001

Source: Federal Transit Administration, 2018, Transit Noise and Vibration Impact Assessment Manual.
Note: PPV, peak particle velocity

As shown in Table 4.7-6, vibration levels would not exceed the FTA's threshold of 0.2 in/sec PPV at all adjacent residential uses. Vibration levels could reach up to 0.127 in/sec PPV if a vibratory roller is used 35 feet of the nearest structure. However, vibratory rollers are used for paving and the nearest proposed paving activities would be approximately 35 feet from nearby structures and the FTA threshold of 0.2 in/sec PPV would not be exceeded. Therefore, vibration from project construction equipment would result in a **less-than-significant** impact.

Significance without Mitigation: Less than significant.

[3] Federal Transit Administration, 2018, *Transit Noise and Vibration Impact Assessment Manual*.

4.7.5 Cumulative Impact Analysis

Construction Noise

Like stationary-source noise, construction noise and vibration impacts are confined to a localized area of impact. Noise from construction activities would be temporary and would be less than significant after mitigation. Cumulative impacts would only occur if other projects were being constructed in the vicinity of the project at the same time as the project. There are no other, known future projects in the vicinity of the proposed project that might add simultaneous construction activity noise (to the project's construction noise). Therefore, the proposed project would not create a cumulatively considerable stationary noise impact and cumulative construction impacts would be **less than significant**.

Stationary-Source Noise

Stationary-source noise generated by the project is localized and limited to noise impacts to noise-sensitive receptors near the project site. Noise from operation of the project would not result in significant noise impacts to the residential uses in the vicinity. Further, there are no other, known future projects in the vicinity of the proposed project that would add more stationary sources so as to notably contribute to the nearby receptors' community noise levels. Therefore, the proposed project would not create a cumulatively considerable stationary noise impact and cumulative operational impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

4.7 Noise

This page is intentionally left blank.

4.8 TRANSPORTATION

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for implementation of the proposed project to result in a significant transportation impact. As described in Chapter 2, *Introduction*, of this Draft EIR, the only significance criterion identified in the California Environmental Quality Act (CEQA) Guidelines that is evaluated in this chapter is regarding conflicting with or being inconsistent with CEQA Guidelines Section 15064.3, *Determining the Significance of Transportation Impacts,* subdivision (b), *Criteria for Analyzing Transportation Impacts*. Therefore, the information in this chapter is only focused on the issue of vehicle miles traveled (VMT), which is a measure of circulation network use or efficiency that accounts for the number of daily vehicle trips generated, multiplied by the length or distance of those trips. VMT represents a number of daily miles driven and can be expressed in different ways, including total VMT, which is an aggregate value measured in miles, and VMT per capita or VMT per employee, both of which are performance metrics measured in the number of miles driven per person.

4.8.1 Regulatory Background

STATE

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law.[1] The Legislature found that with the adoption of the Sustainable Communities and Climate Protection Act of 2008, commonly referred to by its legislative bill number Senate Bill (SB) 375, the State had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce VMT and thereby contribute to the reduction of greenhouse gas emissions (GHG), as required by the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32). SB 743 required CEQA lead agencies to shift away from using traditional level of service standards and automobile delay to determine significant traffic impacts. It should be noted that level of service standards are used outside of the CEQA document to evaluate other non-CEQA transportation impacts of development projects, such as congestion, circulation, and safety issues and concerns.

California Environmental Quality Act: Section 15064.3

In response to the passing of SB 743, the Governor's Office of Land Use and Climate Innovation (LCI) (formally the Office of Planning and Research) updated the CEQA Guidelines Section

[1] An act to amend Sections 65088.1 and 65088.4 of the Government Code, and to amend Sections 21181, 21183, 21186, 21187, 21189.1, and 21189.3 of, to add Section 21155.4 to, to add Chapter 2.7 (commencing with Section 21099) to Division 13 of, to add and repeal Section 21168.6.6 of, and to repeal and add Section 21185 of, the Public Resources Code, relating to environmental quality.

4.8 Transportation

15064.3 to include new transportation-related evaluation metrics, including VMT. Specifically, Section 15064.3(b)(1) and (2) list the criteria for analyzing transportation impacts for land use projects and transportation projects, respectively. Section 15064.3(b)(3) and (4) describe analysis approaches including qualitative analysis and other methodologies, respectively.

LOCAL

In keeping with the new CEQA requirements pursuant to SB 743, the City released its Multi-Modal Transportation Analysis Handbook (MTA Handbook), which establishes a clear and consistent technical approach to undertaking transportation analysis for projects in Mountain View. The MTA Handbook is based on the current City processes and state-of-practice in transportation planning and traffic engineering. The City expects these guidelines to result in studies that provide a comprehensive and accurate analysis of multi-modal transportation and traffic effects, which provide valuable information for decision-makers and the public as the City reviews project proposals. The MTA Handbook provides a methodology for assessing transportation operational effects of projects and associated operational improvements. Specifically, Section 4.4, *Vehicle Miles Traveled (VMT) Analysis*, of the MTA Handbook states that a project shall undertake VMT analysis as required under CEQA requirements and outlined in Appendix A (CEQA Transportation Analysis) and Appendix B (VMT Analysis Requirement Checklist) of the MTA Handbook. Appendix A includes guidance on when a project shall undertake a VMT analysis and when a project is exempt from a quantitative VMT analysis. Appendix B includes a checklist that is used to determine if a project is screened out from the preparation of a quantitative VMT analysis.

4.8.2 Existing Conditions

As described in Chapter 3, *Project Description*, of the Draft EIR, the project site is currently occupied by the Mountain View Police Services - Fire Administration building and a pump station, K-9 training area, 42-stall public parking lot, 110-stall, restricted-access parking lot, for a total of 152 parking spaces. The project site currently has 169 employees.

4.8.3 Significance Criteria

The Initial Study prepared for this Draft EIR (see Appendix A, *Notice of Preparation, Initial Study, and Scoping Comments*) identified that the proposed project would not result in a significant impact for the following significance criteria:

- Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- Would the project result in inadequate emergency access?

The proposed project would have a significant impact under Appendix G, *Environmental Checklist Form*, of the California Environmental Quality Act (CEQA) Guidelines if it would:

a) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

4.8.4 Project Impact Analysis

The following impact analysis addresses the threshold of significance for which the Initial Study disclosed potentially significant impacts.

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

The proposed project would replace the existing Mountain View Police Services - Fire Administration building with a new Public Safety Building with the same local community-serving use and purpose for the residents of Mountain View. While the on-site parking would increase from 152 to 244 spaces, and the building's maximum capacity is designed for up to 242 employees, once built, the proposed Public Safety Building would have an immediate personnel increase of thirteen (13) environmental health staff who would be relocated to the project site as part of the proposed project. This increase in staff is not substantial and represents an approximately 8-percent increase from existing conditions. Therefore, implementation of the proposed project would generate a nominal increase in vehicle trips. However, because the new employees at the project site would be relocated from existing office space elsewhere in the city, the increase in trips would not represent net new trips for the city as a whole.

Further, the project does not generate any new population and at full capacity would serve the city population overtime as it grows. Pursuant to the City's MTA Handbook's Methodology, "Public services (e.g., police, fire stations, libraries, community centers, public utilities) do not generally generate substantial VMT. Instead, these land uses are often built in response to developments from other land uses (e.g., office and residential) and typically serve local communities." The MTA Handbook also states that public services buildings can be evaluated using the retail thresholds. As stated, the proposed project will replace the existing use with the same community-serving uses with a net new building size of approximately 30,000 square feet, which is less than the 50,000 square-foot local-serving retail project size that the City finds to have a less-than-significant VMT impact.

Additionally, a key environmental aspect of VMT is its relationship to greenhouse gas (GHG) emissions. As discussed in Section 4.5, *Greenhouse Gas Emissions*, of this Draft EIR, the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and would not conflict with an applicable plan,

policy or regulation adopted for the purpose of reducing GHG emissions. For these reasons, the project would not conflict with or be consistent with CEQA Guidelines Section 15064.3 and the impact is **less than significant**.

Significance without Mitigation: Less than significant.

4.8.5 Cumulative Impact Analysis

The analysis of the proposed project, above, addresses cumulative impacts to the transportation network in the city and its surroundings; accordingly, cumulative impacts would be the same as those discussed above and no additional analysis is warranted.

Significance without Mitigation: Less than significant.

5. Alternatives to the Proposed Project

5.1 INTRODUCTION

This chapter presents the alternatives analysis for the proposed project, as required by the California Environmental Quality Act (CEQA). CEQA requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives" (CEQA Guidelines sec. 15126.6[a]).

The discussion includes an explanation of the methodology used to select alternatives to the proposed project, with the intent of identifying potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified for the proposed project while still meeting most of the basic project objectives, pursuant to CEQA Guidelines Section 15126.6(a). This chapter identifies a reasonable range of alternatives that meet these criteria, and these alternatives are evaluated with respect to minimizing adverse environmental effects as compared to the proposed project. It also describes other alternatives and alternative concepts that were considered but eliminated from detailed consideration and the reasons for their elimination. For the alternatives selected for analysis, this chapter evaluates the impacts of the alternatives against baseline environmental conditions and compares the potential impacts of the alternatives with those of the proposed project. Finally, as required under CEQA Guidelines Section 15126.6(e), based on this analysis, this chapter then discusses the Environmentally Superior Alternative.

The discussion in this chapter is intended to inform the public and decision makers of feasible alternatives to the proposed project that would avoid or substantially lessen any of the significant effects of the proposed project. Section 15126.6, "Consideration and Discussion of Alternatives to the Proposed Project," of the CEQA Guidelines states that:

> An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination

and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. (sec. 15126.6[a])

5.2 FACTORS CONSIDERED WHEN DEVELOPING ALTERNATIVES

This section describes the basis for determining the range of CEQA alternatives and identifies the specific alternatives that are analyzed in this Draft EIR. The primary factors considered when determining feasible alternatives to the proposed project are the identified project objectives and the significant impacts that have been identified for the proposed project.

5.2.1 Project Objectives

Chapter 3, Section 3.3, *Statement of Objectives*, lists the objectives that have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts.

5.2.2 Significant Impacts

Apart from the No Project Alternative, alternatives to a project should be evaluated because of their ability to feasibly attain most of the basic objectives of the project and avoid or lessen the project's identified significant impacts. The proposed project would result in 12 significant impacts.

LESS-THAN-SIGNIFICANT IMPACTS WITH MITIGATION

The following impacts were found to be less than significant with implementation of mitigation measures.

- **Impact AIR-1:** Without mitigation, construction activities for the proposed project could generate fugitive dust that exceeds State standards.
- **Impact AIR-2:** Construction activities for the proposed project could generate cancer risks above acceptable levels for the maximally exposed residential receptor.
- **Impact BIO-1:** Tree removal and demolition activities during site clearance could destroy active nests, and/or otherwise interfere with nesting of birds protected under federal and State law.
- **Impact BIO-2:** The proposed development would result in removal of trees protected under City's Municipal Code.
- **Impact CUL-2:** Construction activities for the proposed project have the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15064.5.

- **Impact CUL-3:** Construction activities for the proposed project have the potential to result in unanticipated discovery of human remains interred outside of dedicated cemeteries.
- **Impact CUL-4:** Construction activities for the proposed project have the potential to cause a significant impact to an unknown tribal cultural resource as defined in Public Resources Code 21074.
- **Impact GEO-1:** The construction activities, increased site occupancy, and development of new structures under the proposed project could exacerbate an existing hazard associated with liquefaction due to seismic events.
- **Impact GEO-2:** The construction activities, development, and increased site occupancy involved in the proposed project could exacerbate an existing hazard associated with unstable soils due to seismically induced liquefaction.
- **Impact HAZ-1:** The construction activities and increased site occupancy involved in the proposed project could exacerbate an existing hazard associated with the release of hazardous materials originating from off-site land uses.
- **Impact NOI-1:** The proposed project would generate a substantial temporary increase in ambient noise levels during construction.

SIGNIFICANT AND UNAVOIDABLE IMPACTS

The following impact was found to be significant and unavoidable even with implementation of mitigation measures.

- **Impact CUL-1:** The proposed project would remove the historical resource on the project site that is eligible for listing in the California Register under Criterion 3 as a significant example of the work of master architect Goodwin Steinberg.

5.3 ALTERNATIVES CONSIDERED AND REJECTED

CEQA Guidelines Section 15126.6(c) requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. CEQA Guidelines Section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. Following is a discussion of alternatives considered and rejected, along with the reasons that alternative was not included in the analysis.

OFF-SITE/ALTERNATE SITE ALTERNATIVE

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126.6(a)]). It is presumed that an alternate site could be identified that would avoid the proposed project's significant-and-unavoidable impact associated with historic resources. However, in general, any development of the size and type proposed by the project would have substantially the same impacts on air quality, biological resources, noise, and tribal cultural resources. Without a site-specific analysis, specific impacts on cannot be evaluated. In addition, this alternative would not meet the project's objective to reuse the site of the existing Mountain View Police Services - Fire Administration building.

Because no suitable alternative site that could meet the basic objectives of the project would reduce all significant impacts, a feasible location alternative was not identified and was not evaluated further.

5.4 ALTERNATIVES SELECTED FOR ANALYSIS

The following alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the objectives of the proposed project and that may avoid or substantially lessen any of the significant impacts of the proposed project.

- No Project Alternative
- Historic Preservation Alternative

The analyses of the project alternatives focus on these same significance criteria evaluated in Chapter 4 of this Draft EIR because both project alternatives would be located on the same project site as the proposed project, and would entail the same building size and footprint as exists under existing conditions. Thus, both project alternatives would either represent a continuation of baseline of conditions or would have the potential to affect the same environmental resources that would be affected under the proposed project.

5.5 ALTERNATIVE A: NO PROJECT ALTERNATIVE

Under the No Project Alternative, the proposed project would not be approved. No development activities would occur on the project site, which would remain in its existing condition. The project site is currently occupied by the Mountain View Police Services - Fire

Administration building; a 42-stall public parking lot; a 110-stall, restricted-access parking lot' a pump station; and a K-9 training area. Under this alternative, these facilities would remain on the project site, and no changes in the use or occupancy of the project site would occur. Unlike under the proposed project, under the No Project Alternative environmental health staff would not be relocated to the project site.

5.5.1 Air Quality

As described in Section 4.1, *Air Quality*, the proposed project would result in two significant-but-mitigable impacts associated with air emissions from construction activities. These impacts would be less than significant with the implementation of Mitigation Measure AIR-1 and AIR-2. Operational and odor impacts would be less than significant without mitigation.

Under the No Project Alternative, no construction activities would occur. Therefore, the project's two significant-but-mitigable impacts would be avoided.

Under the proposed project, all new facilities would meet current State building standards and would be Leadership in Energy and Environmental Design (LEED) Gold certified, and would thus be designed with high-efficiency fixtures and energy conservation features. The No Project Alternative would not include these beneficial project features. However, under project operations of both the proposed project and the No Project Alternative, the primary source of long-term criteria air pollutants would be from project-related vehicle trips. Because the No Project Alternative would involve reduced on-site parking, a reduced building size, and reduced building occupancy in comparison to the proposed project, it is expected that this alternative would generate fewer vehicle trips than the proposed project. Therefore, overall operational emissions are expected to be reduced when compared to the proposed project.

Overall, the No Project Alternative would result in **reduced** air quality impacts when compared to the proposed project.

5.5.2 Biological Impacts

As described in Section 4.2, *Biological Resources*, construction of the proposed project would result in two significant-but-mitigable impacts associated with tree removal and potential disturbance to nesting birds. These impacts would be less than significant with the implementation of Mitigation Measure BIO-1 and BIO-2.

The No Project Alternative would not involve construction activities and thus would avoid the project's significant-but-mitigable impacts. Therefore, impacts would be **reduced** when compared to the proposed project.

5.5.3 Cultural and Tribal Cultural Resources

As described in Section 4.3, *Cultural and Tribal Cultural Resources*, the proposed project would result in a significant and unavoidable impact associated with the demolition of the Mountain View Police Services - Fire Administration building, a historical resource. In addition, the proposed project would result in three significant-but-mitigable impacts associated with construction activities for the proposed project that have the potential to adversely affect or disturb unknown subsurface archaeological resources, human remains, and tribal cultural resources. These impacts would be less than significant with the implementation of Mitigation Measures CUL-2, CUL-3, and CUL-4, respectively.

The No Project Alternative would not involve demolition activities that would remove a built historic resource or construction activities that could disturb unknown subsurface resources. Therefore, it would avoid the project's significant cultural and tribal cultural resource impacts and impacts would be **reduced** when compared to the proposed project.

5.5.4 Geology and Soils

As described in Section 4.4, *Geology and Soils*, the proposed project would result in two significant-but-mitigable associated with the exacerbation of existing soil and seismic hazards. These impacts would be less than significant with the implementation of Mitigation Measures GEO-1 and GEO-2.

The No Project Alternative would not involve construction activities that would involve ground disturbance or develop new structures. The No Project Alternative would not involve any changes to the current use or occupancy of the project site and would not expose additional people to existing hazards when compared to existing conditions. Therefore, it would avoid the project's significant-but-mitigable geology and soils impacts and impacts would be **reduced** when compared to the proposed project.

5.5.5 Greenhouse Gas Emissions

As described in Section 4.5, *Greenhouse Gas Emissions*, the proposed project would result in less-than-significant greenhouse gas (GHG) emissions impacts, and mitigation is not required.

The No Project Alternative would not involve construction activities and thus would result in reduced construction phase GHG emissions.

As described in Section 5.5.1, *Air Quality*, under the proposed project, all new facilities would meet current State building standards and would be LEED Gold certified, and would thus be designed with high-efficiency fixtures and energy conservation features. The No Project Alternative would not include these beneficial project features. However, because the No Project Alternative would involve reduced on-site parking, a reduced building size, and reduced

building occupancy in comparison to the proposed project, it is expected that operation of this alternative would generate fewer vehicle trips and thus reduced GHG emissions when compared to the proposed project.

Overall, neither the proposed project nor the No Project Alternative would result in significant GHG emissions impacts. Therefore, the No Project Alternative would result in **similar** impacts when compared to the proposed project.

5.5.6 Hazards and Hazardous Materials

As described in Section 4.6, *Hazards and Hazardous Materials*, the proposed project would result in one significant-but-mitigable impact associated with potential exposure of future construction workers and future site occupants to the release of hazardous materials originating from former off-site land uses. This impact would be less than significant with the implementation of Mitigation Measure HAZ-1.

The No Project Alternative would not involve construction activities or increase the site occupancy of the project site when compared to existing conditions. Therefore, it would avoid the project's significant-but-mitigable impact associated with exacerbating a potential existing hazard and impacts would be **reduced** when compared to the proposed project.

5.5.7 Noise

As described in Section 4.7, *Noise*, the proposed project would result in one significant-but-mitigable impact associated with construction activities. This impact would be less than significant with the implementation of Mitigation Measure NOI-1.

The No Project Alternative would not involve construction activities. Therefore, it would avoid the project's significant-but-mitigable impact.

As described in Section 4.7, *Noise*, the proposed project is expected to result in similar overall levels of operational noise when compared to existing conditions. The No Project Alternative would not increase the site occupancy of the project site when compared to existing conditions and is expected to result in fewer vehicle trips when compared to the proposed project. Therefore, operational noise is expected to be slightly reduced when compared to the proposed project.

Overall, noise impacts would be **reduced** when compared to the proposed project.

5.5.8 Transportation

As described in Section 4.8, *Transportation*, the proposed project would result in less-than-significant transportation impacts, and mitigation is not required.

The No Project Alternative would not involve any changes to the current use or occupancy of the project site. Therefore, it would not result in any vehicle trips in comparison to existing conditions.

Overall, neither the proposed project nor the No Project Alternative would result in significant transportation impacts. Therefore, the No Project Alternative would result in **similar** impacts when compared to the proposed project.

5.6 ALTERNATIVE B: HISTORIC PRESERVATION ALTERNATIVE

Under the Historic Preservation Alternative, the existing, 44,914-square-foot building would not be demolished and the proposed project would occur within the existing Mountain View Police Services - Fire Administration building. This alternative assumes that the existing parking garage would be reconfigured and/or expanded, or that new structured parking would be built, to accommodate the increased parking supply included in the proposed project. While parking areas would be reconfigured or expanded to accommodate more vehicles, the overall site access would not be changed.

Because the building size would not increase from existing conditions, it is assumed that this alternative would include interior renovations to upgrade existing facilities but would not include any notable expansions to existing facilities, amenities, or offices for Mountain View Police Department staff. In addition, unlike under the proposed project, under this alternative environmental health staff would not be relocated to the proposed project.

5.6.1 Air Quality

As described in Section 4.1, *Air Quality*, the proposed project would result in two significant-but-mitigable impacts associated with air emissions from construction activities. These impacts would be less than significant with the implementation of Mitigation Measure AIR-1 and AIR-2. Operational and odor impacts would be less than significant without mitigation.

Under the Historic Preservation Alternative, reduced construction activities would occur when compared to the proposed project. On-site construction would occur but would be limited to interior renovations and parking garage reconfiguration or expansion. While the project's two significant-but-mitigable impacts may not be entirely avoided, air emissions would be reduced when compared to the proposed project.

Under the proposed project, all new facilities would meet current State building standards and would be LEED Gold certified, and would thus be designed with high-efficiency fixtures and energy conservation features. The Historic Preservation Alternative would not include these beneficial project features.

Under project operations of both the proposed project and the Historic Preservation Alternative, the primary source of long-term criteria air pollutants would be from project-related vehicle trips. Because the Historic Preservation Alternative would involve a reduced building size and reduced building occupancy in comparison to the proposed project, it is expected that this alternative would generate fewer employee vehicle trips than the proposed project. However, the Historic Preservation Alternative would increase the parking supply at the site and renovate the on-site building, which could result in additional visitors occupying the project site when compared to existing conditions. Therefore, overall operational air emissions are expected to be only slightly reduced when compared to the proposed project.

Overall, the Historic Preservation Alternative would result in **reduced** air quality impacts when compared to the proposed project.

5.6.2 Biological Impacts

As described in Section 4.2, *Biological Resources*, construction of the proposed project would result in two significant-but-mitigable impacts associated with tree removal and potential disturbance to nesting birds. These impacts would be less than significant with the implementation of Mitigation Measure BIO-1 and BIO-2.

Under the Historic Preservation Alternative, reduced construction activities would occur when compared to the proposed project. However, expansion of on-site parking facilities under this alternative could require tree removal. Therefore, the Historic Preservation Alternative would not avoid the proposed project's significant-but-mitigable impacts, and impacts would be **similar** when compared to the proposed project.

5.6.3 Cultural and Tribal Cultural Resources

As described in Section 4.3, *Cultural and Tribal Cultural Resources*, the proposed project would result in a significant and unavoidable impact associated with the demolition of the Mountain View Police Services - Fire Administration building, a historical resource. In addition, the proposed project would result in three significant-but-mitigable impacts associated with construction activities for the proposed project that have the potential to adversely affect or disturb unknown subsurface archaeological resources, human remains, and tribal cultural resources. These impacts would be less than significant with the implementation of Mitigation Measures CUL-2, CUL-3, and CUL-4, respectively.

The Historic Preservation Alternative would not involve demolition of the existing Mountain View Police Services - Fire Administration building and would therefore avoid the project's significant and unavoidable impact. However, this alternative would involve construction activities that could unknown subsurface resources. Therefore, it would not avoid the project's significant-but-mitigable impacts to cultural and tribal cultural resource impacts.

Overall, cultural and tribal cultural resource impacts would be **reduced** when compared to the proposed project.

5.6.4 Geology and Soils

As described in Section 4.4, *Geology and Soils*, the proposed project would result in two significant-but-mitigable associated with the exacerbation of existing soil and seismic hazards. These impacts would be less than significant with the implementation of Mitigation Measures GEO-1 and GEO-2.

The Historic Preservation Alternative would involve construction activities that would involve ground disturbance and develop new or expanded parking structures and facilities on the project site. While this alternative would not increase the employee population of the project site, it would increase the parking supply at the site and renovate the on-site building, which could result in additional visitors occupying the project site. Therefore, it could expose additional people to existing hazards when compared to existing conditions.

Therefore, the Historic Preservation Alternative would not avoid the project's significant-but-mitigable geology and soils impacts and impacts would be **similar** when compared to the proposed project.

5.6.5 Greenhouse Gas Emissions

As described in Section 4.5, *Greenhouse Gas Emissions*, the proposed project would result in less-than-significant GHG emissions impacts, and mitigation is not required.

Under the Historic Preservation Alternative, reduced construction activities would occur when compared to the proposed project. On-site construction would occur but would be limited to interior renovations and parking garage reconfiguration or expansion. Therefore, construction phase GHG emissions would be reduced when compared to the proposed project.

As described in Section 5.6.1, *Air Quality*, under the proposed project, all new facilities would meet current State building standards and would be LEED Gold certified, and would thus be designed with high-efficiency fixtures and energy conservation features. The Historic Preservation Alternative would not include these beneficial project features.

As described in Section 5.6.1, *Air Quality*, overall operational vehicle trips are expected to be only slightly reduced when compared to the proposed project. Thus, operational GHG emissions would be slightly reduced when compared to the proposed project.

Overall, neither the proposed project nor the Historic Preservation Alternative would result in significant GHG emissions impacts. Therefore, the Historic Preservation Alternative would result in **similar** impacts when compared to the proposed project.

5.6.6 Hazards and Hazardous Materials

As described in Section 4.6, *Hazards and Hazardous Materials*, the proposed project would result in one significant-but-mitigable impact associated with potential exposure of future construction workers and future site occupants due to the release of hazardous materials originating from off-site land uses. This impact would be less than significant with the implementation of Mitigation Measure HAZ-1.

Under the Historic Preservation Alternative, reduced construction activities would occur when compared to the proposed project. On-site construction would occur but would be limited to interior renovations and parking garage reconfiguration or expansion. Parking garage construction under this alternative is expected to involve subterranean construction, which could expose construction workers to potential soils and groundwater contamination. In addition, while this alternative would not increase the employee population of the project site, it would increase the parking supply at the site and renovate the on-site building, which could result in additional visitors occupying the project site. Therefore, like the proposed project, this alternative would increase the number of site occupants exposed to potential hazards when compared to existing conditions.

Like the proposed project, the Historic Preservation Alternative would result in a significant-but-mitigable impact associated with exacerbating a potential existing hazard; therefore, impacts would be **similar** when compared to the proposed project.

5.6.7 Noise

As described in Section 4.7, *Noise*, the proposed project would result in one significant-but-mitigable impact associated with construction activities. This impact would be less than significant with the implementation of Mitigation Measure NOI-1.

Under the Historic Preservation Alternative, reduced construction activities would occur when compared to the proposed project. On-site construction would occur but would be limited to interior renovations and parking garage reconfiguration or expansion. Therefore, this alternative is expected to reduce, but not entirely avoid, the project's significant-but-mitigable noise impact.

As described in Section 4.7, *Noise*, the proposed project is expected to result in similar overall levels of operational noise when compared to existing conditions. The Historic Preservation Alternative, like the proposed project, would increase the number of site occupants and vehicle trips when compared to existing conditions. Therefore, operational noise is expected to be similar when compared to the proposed project.

Overall, noise impacts would be **similar** when compared to the proposed project.

5.6.8 Transportation

As described in Section 4.8, *Transportation*, the proposed project would result in less-than-significant transportation impacts, and mitigation is not required.

As described in Section 5.6.1, *Air Quality*, overall operational vehicle trips under the Historic Preservation Alternative are expected to be only slightly reduced when compared to the proposed project.

Overall, neither the proposed project nor the Historic Preservation Alternative would result in significant transportation impacts. Therefore, the Historic Preservation Alternative would result in **similar** impacts when compared to the proposed project.

5.7 SUMMARY OF ALTERNATIVES EVALUATION

Table 5-1, *Comparison of Project Alternative Impacts*, compares the impact of each alternative to impacts of the proposed project. The impacts of each alternative are classified as having a reduced (↓), similar or comparable to (=), or greater (↑) level of impact when compared to the proposed project.

Table 5-1 Comparison of Project Alternative Impacts

Environmental Topic	Proposed Project [1]	Alternative A: No Project Alternative	Alternative B: Historic Preservation Alternative
4.1 Air Quality	LTS/M	↓	↓
4.2 Biological Resources	LTS/M	↓	=
4.3 Cultural and Tribal Cultural Resources	SU	↓	↓
4.4 Geology and Soils	LTS/M	↓	=
4.5 Greenhouse Gas Emissions	LTS	=	=
4.6 Hazards and Hazardous Materials	LTS/M	↓	=
4.7 Noise	LTS/M	↓	=
4.8 Transportation	LTS	=	=

Notes:
1. The impacts listed in this column represent the highest significance determination for each respective topic.

LTS Less than Significant	↓ Reduced impact in comparison to the proposed project
LTS/M Less than Significant with Mitigation	= Similar impact in comparison to the proposed project
SU Significant and Unavoidable	↑ Greater impact in comparison to the proposed project

Table 5-2, *Ability to Meet Proposed Project Objectives*, identifies the ability of each of the project alternatives to meet the proposed project's objectives.

Table 5-2 Ability to Meet Proposed Project Objectives

Objective	Proposed Project	Alternative A: No Project Alternative	Alternative B: Historic Preservation Alternative
General Plan Consistency. Provide for the development of the site consistent with City's General Plan.	Yes	Yes	Yes
Enhance Public Safety Infrastructure. Construct a modern, state-of-the-art Public Safety Building that meets the operational needs of the Mountain View Police Department (MVPD) and other public safety personnel.	Yes	No	Partial
Improve Operational Efficiency. Provide upgraded facilities, including offices, an auditorium, sleep quarters, lockers, and fitness areas, to enhance the functionality and efficiency of police and fire department operations.	Yes	No	Partial
Increase Parking Capacity. Develop a three-story parking garage and reconfigure surface parking to accommodate approximately 244 parking spaces, improving access for personnel and visitors.	Yes	No	Yes
Enhance Site Access and Circulation. Improve vehicular and pedestrian access with designated secured and public entry points from Oak Street and Franklin Street while maintaining connectivity to major transportation routes.	Yes	No	No
Preserve Flexibility for Future City Uses. Reserve 0.6 acres of the project site for potential future municipal development to accommodate evolving community needs.	Yes	No	No
Site Reuse. Utilize the site that currently houses the Mountain View Police Services - Fire Administration building at 1000 Villa Street due to its central location and parcel size that allows for the size and mix of facilities envisioned for the proposed project.	Yes	Partial	Partial

5.7.1 Summary of Alternative A: No Project Alternative

As shown in Table 5-1, *Comparison of Project Alternative Impacts*, the No Project Alternative would result in similar impacts related to GHG emissions and transportation. All other impacts (air quality, biological resources, cultural and tribal cultural resources, geology and soils, hazards and hazardous materials, and noise) would be reduced when compared to the proposed project.

As shown in Table 5-2, *Ability to Meet Proposed Project Objectives*, the No Project Alternative would meet the objective to be consistent with the General Plan. It would partially meet the objective to reuse the project site because it would utilize the project site but would not allow for the size and mix of facilities envisioned for the proposed project. The No Project Alternative would not meet any additional project objectives.

5.7.2 Summary of Alternative B: Historic Preservation Alternative

As shown in Table 5-1, *Comparison of Project Alternative Impacts*, the Historic Preservation Alternative would result in reduced impacts related to air quality and cultural and tribal cultural resources. All other impacts (biological resources, geology and soils, GHG emissions, hazards and hazardous materials, noise, and transportation) would be similar when compared to the proposed project.

As shown in Table 5-2, *Ability to Meet Proposed Project Objectives*, the Historic Preservation Alternative would meet or partially meet most of the project objectives because it would be consistent with the General Plan, allow for some on-site enhancements (through interior renovations), increase the project site's parking supply, and be located on the project site. The Historic Preservation Alternative would not provide a state-of-the art building, fully meet operational needs and efficiencies, enhance site access, provide an on-site reserve area for future City use, or allow for the size and mix of facilities envisioned for the proposed project.

5.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, CEQA Guidelines Section 15126.6 requires that an "environmentally superior" alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative to the proposed project that would be expected to generate the least number of significant impacts. Identification of the environmentally superior alternative is an informational procedure, and the alternative to the proposed project selected may not be the alternative to the proposed project that best meets the goals or needs of the City of Mountain View. Because CEQA Guidelines Section 15126.6(c) requires an evaluation of a reasonable range of alternatives to the proposed project, the proposed project under consideration cannot be identified as the environmentally superior

alternative. Additionally, in accordance with CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

As shown in Table 5-1, *Comparison of Project Alternative Impacts*, and discussed in Section 5.7, *Summary of Alternative Evaluation*, the No Project Alternative would reduce impacts for nearly all environmental topics (six out of eight) when compared to the proposed project. The next environmentally superior alternative would be the Historic Preservation Alternative, which would reduce impacts for two topic areas.

5. Alternatives to the Proposed Project

This page is intentionally left blank.

6. Other CEQA Considerations

This chapter provides an overview of the impacts of the proposed project based on the analyses presented in Chapters 4 and 5 of this Draft EIR. The topics covered in this chapter include impacts found not to be significant, growth-inducing impacts, and significant irreversible changes to the environment. A more detailed analysis of the effects that the proposed project would have on the environment, and proposed mitigation measures to minimize significant impacts, are provided in Sections 4.1 through 4.8.

6.1 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15128 allows environmental issues for which there is no likelihood of a significant impact to be briefly discussed and not analyzed further in the EIR. An Initial Study was prepared for the proposed project (see Appendix A, *Notice of Preparation, Initial Study, and Scoping Comments,* of this Draft EIR). Based on the analysis contained in the Initial Study and the existing conditions on the project site and surrounding area it was determined that development of the proposed project would not result in significant environmental impacts for the following environmental issues:

- Aesthetics
- Agricultural and Forestry Resources
- Energy
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Wildfire

In addition, based on the analysis contained in the Initial Study it was determined that development of the proposed project would not result in significant environmental impacts for some of the significance criteria in the following topic areas and, therefore, impacts related to these criteria are not analyzed further in this Draft EIR.

- **Air Quality**
  Would the project conflict with or obstruct implementation of the applicable air quality plan?

6. Other CEQA Considerations

- **Biological Resources**
  - Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
  - Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
  - Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
  - Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

- **Geology and Soils**
  - Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
    - Strong seismic ground shaking?
    - Landslides?
  - Would the project result in substantial soil erosion or the loss of topsoil?
  - Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
  - Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
  - Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Hazards and Hazardous Materials

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

- Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- 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 or excessive noise for people residing or working in the project area?
- Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

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

- **Transportation**
  - Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
  - Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
  - Would the project result in inadequate emergency access?

6.2 SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(a) requires that "Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short- and long-term effects." CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Table 1-1, *Summary of Significant Environmental Impacts and Mitigation Measures*, in Chapter 1, *Executive Summary* of this Draft EIR summarizes the significant impacts, mitigation measures, and levels of significance with and without mitigation.

6. Other CEQA Considerations

Though mitigation measures would reduce the level of impact of the proposed project, the following impact would remain significant and unavoidable:

> **Impact CUL-1:** The proposed project would remove the historical resource on the project site that is eligible for listing in the California Register under Criterion 3 as a significant example of the work of master architect Goodwin Steinberg.

6.3 SIGNIFICANT IRREVERSIBLE CHANGES

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss whether "Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely." The discussion shall consider primary and secondary impacts that generally commit future generations to similar uses, irreversible damage from environmental accidents, and irretrievable commitments of resources.

6.3.1 Land Use Changes that Commit Future Generations

As described in Chapter 3, *Project Description*, of this Draft EIR, the proposed project will maintain the existing land use. The proposed project would replace the existing Mountain View Police Services - Fire Administration building with a new Public Safety Building with the same local community-serving use and purpose for the residents of Mountain View. Because the project site is already developed with the same uses, redevelopment under the proposed project would not represent a substantial change in land use.

6.3.2 Irreversible Damage from Environmental Accidents

Potential environmental accidents of concern are those that would have adverse effects on the environment or public health due to the nature or quantity of material released during an accident and the receptors exposed to that release. Demolition and construction activities associated with development of the proposed project would involve some risk of environmental accidents; however, these activities would be monitored by local, State, and federal agencies, and would follow professional industry standards for safety and construction. The land uses proposed by the project would not include any uses or activities that are likely to contribute to or be the cause of a significant environmental accident. As a result, the proposed project would not pose a substantial risk due to environmental accidents.

6.3.3 Large Commitment of Non-Renewable Resources

Consumption of nonrenewable resources includes increased energy consumption, conversion of agricultural lands, and lost access to mining reserves. Redevelopment of the proposed project site would require water and electric service, as well as additional resources for construction.

Construction and ongoing maintenance of the proposed project would irreversibly commit some materials and nonrenewable energy resources. Materials and resources used would include, but are not limited to, nonrenewable and limited resources such as oil, gasoline, sand, gravel, asphalt, and steel. These materials and energy resources would be used for infrastructure development, transportation of people and goods, and utilities to operate the project. During the operational phase of the proposed project (post-construction), all electric energy sources would be used for lighting, heating, and cooling of residences and retail space, and oil and gasoline would be used for the transportation of people to and from the project site.

The proposed project would be required to comply with and implement several measures that would offset or reduce the need for nonrenewable resources. For example, the proposed project is required to comply with all applicable building and design requirements, including Title 24 relating to energy conservation. With compliance with Part 11 of Title 24, also known as CALGreen, the State's Green Building Standards Code, the proposed project is required to reduce water consumption by 20 percent, divert 50 percent of construction waste from landfills, and install low pollutant-emitting materials. The proposed project would also implement environmentally sustainable standards for demolition, construction, and operation. The proposed project would be Leadership in Energy and Environmental Design (LEED) Gold certified, and would thus be designed with high-efficiency fixtures and energy conservation features. Further, the City does not contain any agricultural land or a mining reserve; therefore, there would be no impact with regards to those resources (see Section 6.1, *Impacts Found Not to Be Significant*, above).

Although the construction and operation of the proposed redevelopment project would involve the use of nonrenewable resources, through the inclusion of energy-conserving project features and compliance with applicable standards and regulations, the proposed project would not represent a large commitment of nonrenewable resources.

6.4 GROWTH-INDUCING EFFECTS

CEQA Guidelines Section 15126.2(e) requires that an EIR discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Typical growth inducing factors might include the extension of urban services or transportation infrastructure to a previously unserved or under-served area, or the removal of major barriers to development. This section evaluates the proposed project's potential to induce growth. Not all aspects of growth inducement are negative; rather, negative impacts associated with growth inducement occur only where the growth associated with the proposed project would cause adverse environmental impacts.

Growth-inducing impacts can be either direct or indirect. Direct growth-inducing impacts are generally associated with providing urban services to an undeveloped area. Indirect, or

6. Other CEQA Considerations

secondary growth-inducing impacts, consist of growth induced in the region by additional demands for housing, goods, and services associated with the population increase caused by, or attracted to, a new project.

As described in Chapter 3, *Project Description*, of this Draft EIR, the proposed project would replace the existing Mountain View Police Services - Fire Administration building with a new Public Safety Building with the same local community-serving use and purpose for the residents of Mountain View. Accordingly, the construction and operation would not directly or indirectly induce growth.

7. Organizations and Persons Consulted

LEAD AGENCY—CITY OF MOUNTAIN VIEW

Public Works Department

CONSULTANT TEAM

SVA Architects
PlaceWorks
Forget Me Not History
Sandis
Woodreeve Consulting, LLC

7. Organizations and Persons Consulted

This page intentionally left blank.