

R3 Zoning District Update

Draft Environmental Impact Report

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prepared by

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Table of Contents

Executive Summary ES-1
Project Synopsis ES-1
Project Objectives ES-2
Required Discretionary Approvals ES-2
Potential Subsequent Approvals ES-2
Alternatives ES-3
Areas of Known Controversy ES-3
Summary of Impacts and Mitigation Measures ES-3
1 Introduction 1-1
1.1 Statement of Purpose 1-1
1.2 Purpose and Legal Authority 1-1
1.3 Program EIR Background 1-2
1.4 Documents Incorporated by Reference 1-3
1.5 Streamlining and Tiering Opportunities 1-3
1.6 Public Review and Participation Process 1-3
1.7 EIR Content 1-9
1.8 Scope of this EIR 1-10
1.9 Lead, Responsible, and Trustee Agencies 1-10
1.10 Environmental Review Process 1-11
2 Project Description 2-1
2.1 Lead Agency/ Project Proponent and Contact 2-1
2.2 Project Location 2-1
2.3 Project Background 2-4
2.4 Project Characteristics 2-8
2.5 Project Buildout 2-12
2.6 Project Objectives 2-13
2.7 Required Approvals 2-13
2.8 California Native American Tribe Consultation 2-14
3 Environmental Setting 3-1
3.1 Regional Setting 3-1
3.2 Project Area Setting 3-1
3.3 Cumulative Development 3-1
4 Environmental Impact Analysis 4-1
4.1 Aesthetics 4.1-1
4.1.1 Setting 4.1-1
4.1.2 Regulatory Setting 4.1-12

4.1.3 Impact Analysis 4.1-16
4.1.4 Cumulative Impacts 4.1-22
4.2 Air Quality 4.2-1
4.2.1 Setting 4.2-1
4.2.2 Regulatory Setting 4.2-6
4.2.3 Impact Analysis 4.2-9
4.2.4 Cumulative Impacts 4.2-25
4.3 Biological Resources 4.3-1
4.3.1 Setting 4.3-1
4.3.2 Regulatory Setting 4.3-7
4.3.3 Impact Analysis 4.3-22
4.3.4 Cumulative Impacts 4.3-8
4.4 Cultural Resources 4.4-1
4.4.1 Setting 4.4-1
4.4.2 Regulatory Setting 4.4-9
4.4.3 Impact Analysis 4.4-16
4.4.4 Cumulative Impacts 4.4-23
4.5 Geology and Soils 4.5-1
4.5.1 Setting 4.5-1
4.5.2 Regulatory Setting 4.5-12
4.5.3 Impact Analysis 4.5-17
4.5.4 Cumulative Impacts 4.5-26
4.6 Greenhouse Gas Emissions 4.6-1
4.6.1 Setting 4.6-1
4.6.2 Regulatory Setting 4.6-5
4.6.3 Impact Analysis 4.6-16
4.6.4 Cumulative Impacts 4.6-23
4.7 Hazards and Hazardous Materials 4.7-1
4.7.1 Setting 4.7-1
4.7.2 Regulatory Setting 4.7-7
4.7.3 Impact Analysis 4.7-17
4.7.4 Cumulative Impacts 4.7-25
4.8 Hydrology and Water Quality 4.8-1
4.8.1 Setting 4.8-1
4.8.2 Regulatory Setting 4.8-7
4.8.3 Impact Analysis 4.8-19
4.8.4 Cumulative Impacts 4.8-29

4.9 Land Use and Planning 4.9-1
4.9.1 Setting 4.9-1
4.9.2 Regulatory Setting 4.9-2
4.9.3 Impact Analysis 4.9-7
4.9.4 Cumulative Impacts 4.9-11
4.10 Noise 4.10-1
4.10.1 Setting 4.10-1
4.10.2 Regulatory Setting 4.10-4
4.10.3 Impact Analysis 4.10-9
4.10.4 Cumulative Impacts 4.10-20
4.11 Population and Housing 4.11-1
4.11.1 Setting 4.11-1
4.11.2 Regulatory Setting 4.11-2
4.11.3 Impact Analysis 4.11-6
4.11.4 Cumulative Impacts 4.11-10
4.12 Public Services and Recreation 4.12-1
4.12.1 Setting 4.12-1
4.12.2 Regulatory Setting 4.12-4
4.12.3 Impact Analysis 4.12-10
4.12.4 Cumulative Impacts 4.12-19
4.13 Transportation 4.13-1
4.13.1 Setting 4.13-1
4.13.2 Regulatory Setting 4.13-4
4.13.3 Impact Analysis 4.13-9
4.13.4 Cumulative Impacts 4.13-13
4.14 Tribal Cultural Resources 4.14-1
4.14.1 Setting 4.14-1
4.14.2 Regulatory Setting 4.14-2
4.14.3 Impact Analysis 4.14-4
4.14.4 Cumulative Impacts 4.14-6
4.15 Utilities and Service Systems 4.15-1
4.15.1 Setting 4.15-1
4.15.2 Regulatory Setting 4.15-6
4.15.3 Impact Analysis 4.15-19
4.15.4 Cumulative Impacts 4.15-31
4.16 Impacts Found to be Less Than Significant 4.16-1
4.16.1 Agricultural and Forestry Resources 4.16-1
4.16.2 Energy 4.16-2

4.16.3 Mineral Resources 4.16-5
4.16.4 Wildfire 4.16-5
5 Other CEQA Required Discussions 5-1
5.1 Growth Inducement 5-1
5.1.1 Population Growth 5-1
5.1.2 Economic Growth 5-2
5.1.3 Removal of Obstacles to Growth 5-3
5.2 Irreversible Environmental Effects 5-3
5.3 Significant and Unavoidable Impacts 5-5
6 Alternatives 6-1
6.1 Introduction 6-1
6.2 Project Alternatives 6-1
6.2.1 Alternatives Considered but Rejected from Further Evaluation 6-1
6.2.2 Description of Alternatives Evaluated 6-3
6.3 Alternatives Impact Analysis 6-4
6.3.1 Alternative 1: No Project Alternative 6-4
6.3.2 Alternative 2: No Change in Rowhouse and Condominium Areas 6-13
6.3.3 Alternative 3: Lower-Density Across All Change Areas 6-22
6.4 Environmentally Superior Alternative 6-30
7 References 7-1
7.1 Bibliography 7-1
7.2 List of Preparers 7-22

Tables

Table ES-1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts ES-4
Table 1-1 NOP Comments and EIR Response 1-4
Table 2-1 Proposed R3 Zoning Subdistricts 2-9
Table 2-2 Maximum Potential Project Buildout 2-13
Table 3-1 Cumulative Plans and Projects List 3-3
Table 4.2-1 Federal and State Ambient Air Quality Standards 4.2-2
Table 4.2-2 Ambient Air Quality at Nearest Monitoring Stations 4.2-5
Table 4.2-3 Air District Criteria Air Pollutant Screening Levels 4.2-10
Table 4.2-4 Air District Criteria Air Pollutant Significance Thresholds 4.2-11
Table 4.2-5 Air District Odor Source Thresholds 4.2-13
Table 4.2-6 Project Consistency with Applicable 2017 Plan Control Measures 4.2-16
Table 4.3-1 Special-status Wildlife Species with a Moderate Potential to Occur in the Project Area 4.3-4
Table 4.4-1 Built Environment Resources in Mountain View 4.4-6

Table 4.5-1 Geologic Units in R3 Zoning Update Project Area and Paleontological Sensitivity 4.5-23
Table 4.6-1 Operational GHG Emissions 4.6-19
Table 4.6-2 Project Consistency with Plan Bay Area 2050 ..... 4.6-21
Table 4.6-3 City of Mountain View General Plan Consistency for GHG Emissions 4.6-21
Table 4.7-1 Active and Open Hazardous Materials Sites within 0.25 mile of a R3 Zoning District Update Site 4.7-5
Table 4.8-1 Beneficial Uses for Coastal Waters 4.8-2
Table 4.9-1 Existing General Plan Land Uses Within Mountain View 4.9-1
Table 4.9-2 City of Mountain View Zoning Districts in the Project Area 4.9-6
Table 4.10-1 Outdoor Noise Environment Guidelines 4.10-6
Table 4.10-2 Vibration-Related Building Damage Thresholds 4.10-12
Table 4.10-3 Construction Equipment Noise Levels 4.10-13
Table 4.10-4 Vibration Levels for Typical Construction Equipment 4.10-17
Table 4.10-5 Distances at Which Vibration Levels for Typical Construction Equipment Exceed Vibration Thresholds 4.10-17
Table 4.11-1 Existing Mountain View Population, Dwelling Units, and Employment and Projections 4.11-2
Table 4.11-2 Projected Housing Growth 4.11-8
Table 4.12-1 MVLA, LASD, and MVLA Student Generation Rates1 ..... 4.12-3
Table 4.12-2 Existing City-Owned Parks and Acreage 4.12-3
Table 4.12-3 R3 Zoning District Update Student Generation 4.12-14
Table 4.13-1 Existing Transit Services 4.13-3
Table 4.15-1 City of Mountain View Water Supply Sources 4.15-2
Table 4.15-2 Summary of Land Use Scenarios 4.15-19
Table 4.15-3 Estimated Solid Waste Generation for Operation of the Proposed Project 4.15-29
Table 6-1 Overall Impact Comparison of Alternatives 6-31

Figures

Figure 1-1 Environmental Review Process 1-13
Figure 2-1 City of Mountain View Regional Location 2-2
Figure 2-2 Project Location 2-3
Figure 2-3 Existing Mountain View Zoning Districts 2-6
Figure 2-4 Existing General Plan Land Use Designations 2-7
Figure 2-5 Change Areas 2-10
Figure 2-6 Proposed Zoning Update Parcels 2-11
Figure 4.1-1 Existing Visual Character 4.1-7
Figure 4.3-1 Aquatic Resources in the City of Mountain View 4.3-3
Figure 4.5-1 Earthquake Faults in the Vicinity of Mountain View 4.5-3
Figure 4.5-2 Liquefaction Hazards in the Vicinity of Mountain View 4.5-5

Figure 4.5-3 Geologic Map and Paleontological Sensitivity of the Project Area 4.5-9
Figure 4.5-4 Geologic Units and Paletological Senstivity..... 4.5-24
Figure 4.7-1 Hazardous Materials Sites in Mountain View..... 4.7-4
Figure 4.7-2 Moffett Federal Airfield Airport Influence Area 4.7-8
Figure 4.8-1 FEMA Flood Zone Areas in Mountain View 4.8-5
Figure 4.8-2 Tsunami Hazard Areas in Mountain View 4.8-6
Figure 4.10-1 Examples of Typical Noise Levels..... 4.10-2

Appendices

Appendix A NOP and Responses
Appendix B AB 52 and SB 18 correspondence
Appendix C Transportation Impact Analysis prepared by Fehr & Peers
Appendix D Special-Status Species Potential to Occur
Appendix E NWIC Results
Appendix F CalEEMod Results
Appendix G Utility Impact Study prepared by Schaaf & Wheeler

Executive Summary

This section summarizes the characteristics of the Proposed Project, as well as the environmental impacts and recommended mitigation measures for the R3 Zoning District Update.

Project Synopsis

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Project Location

Mountain View is located in northern Santa Clara County in the western portion of the Santa Clara Valley, at the southern end of the San Franisco Peninsula. Mountain View is bordered by the City of Palo Alto to the northwest, the City of Los Altos to the southwest, the City of Sunnyvale to the east, and the San Francisco Bay to the north. Affected parcels are shown within Section 2, *Project Description*, on Figure 2-5 and Figure 2-6. Therein, it showcases that the project would occur citywide, with a majority of the proposed parcels located south of Highway 101 within the city limits.

Project Description

This EIR has been prepared to examine the potential environmental effects of the R3 Zoning District Update (Proposed Project). The following is a brief summary of the full project description, which can be found in full in Section 2, *Project Description*.

The R3 Zoning District Update is a comprehensive update of the City's General Plan, Zoning Code (Chapter 36 of the City Code), Zoning Map and various Precise Plans. The City of Mountain View R3 Zoning District covers approximately 15 percent of the City's area and 50 percent of the City's dwelling units.

The Proposed Project would create new R3 Zoning District and subdistricts, changes to align the R2 Zoning District with the Housing Element, changes to align other residential zoning districts with State law, General Plan Amendments to align with envisioned densities, and other minor changes to the Zoning Map and Chapter 36 (Zoning) of the City Code. The amendments would apply to 8,350 parcels over 1,260 acres, in addition to general amendments of the City Code that would apply universally.

Proposed areas for increased intensity/density of development under this R3 Zoning District include the R3 Zoning District and Precise Plans that reference R3 District. Additional areas have been identified for increased density to facilitate development which include subdistricts R3-A , R3-D1, and R3-D2. The creation and modified land use designations proposed would reflect allowable density and specific-property density consistent with General Plan.

Based on the number of new dwelling units and jobs projected under buildout of the Project, and an assumed persons per unit rate by unit type in 2025, full buildout of R3 Zoning District Update in 2050 would result in an estimated 10,000-16,000 additional residential units with the possibility of additional 8,800-14,800 additional units in Mountain View. When combined with the existing 2025 population of 86,513, the total population of Mountain View in 2050 would be 177,800 persons in 2050.

Project Objectives

The following are objectives of the Proposed Project:

1. Create opportunities for diverse unit types, including middle-income ownership and stacked flats;
2. Produce better design that reflects the community's vision through objective form-based standards, including pedestrian-friendly neighborhoods, respectful transitions, and increased tree canopy and landscaping;
3. Create opportunities for neighborhood-serving uses;
4. Update the R3 Zoning District to be consistent with state law and the General Plan while addressing Housing Element programs and improving development review;
5. Use density change in targeted areas to achieve desired goals, implement changes to large-parcel areas rather than small, and increase the supply of housing; and
6. Encourage parcel aggregation.

Required Discretionary Approvals

With recommendations from the City's Planning Commission, the Mountain View City Council would need to take the following discretionary actions in conjunction with the Proposed Project:

- Certification of the EIR
- Adoption of the EIR Findings and Statement of Overriding Considerations
- Adoption of a Mitigation, Monitoring, and Reporting Program in conjunction with the EIR
- Adoption of the R3 Zoning District Update, including amendments to the General Plan, Zoning Ordinance, and ten (10) precise plans: P(5) 460 North Shoreline Boulevard, P(6) San Ramon, P(13) California-Ortega, P(14) 2100 California Street, P(17) Villa Mariposa, P(26) Grant-Martens, P(32) Evandale, P(38) El Camino Real, and P(40) San Antonio. An additional two (2) precise plans may be amended to address the public facilities rezoning: P(35) Whisman Station and P(37) South Whisman.

Potential Subsequent Approvals

The City of Mountain View (staff, Zoning Administrator, or City Council) would potentially need to take the following actions in conjunction with the implementation of the Proposed Project:

- Development Review (subject to objective standards only, unless exceptions are requested)
- Conditional Use Permit (e.g., shared or reduced parking)
- Minor Exception (e.g., minor parking or setback reductions)
- Heritage Tree Removal Permit
- Subdivision Map (e.g. condominiums, lot line adjustments, etc.)

Alternatives

As required by the California Environmental Quality Act (CEQA), this EIR examines alternatives to Proposed Project. Studied alternatives include the following three alternatives.

- Alternative 1: No Project Alternative
- Alternative 2: No Change in Rowhouse and Condominium Areas
- Alternative 3: Lower Density Alternative Across All Change Areas

CEQA requires that an environmentally superior alternative be identified among those analyzed. It further states that if the No Project Alternative is identified as environmentally superior, the next most environmentally superior alternative must also be identified. When taking into account every environmental impact area, Alternative 2, No Change in Rowhouse and Condominium Areas, is the environmentally superior alternative with the greatest reduction in potential impacts. Refer to Section 6, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

The EIR scoping process did not identify areas of known controversy for the Proposed Project. Under CEQA, an area of controversy refers to a documented, substantive disagreement regarding a project's environmental impacts, the adequacy of the analysis, or the feasibility or effectiveness of mitigation measures, such as conflicting expert or agency opinions or unresolved challenges to environmental conclusions. Comments received during the Notice of Preparation and scoping process did not raise sustained or substantive environmental disagreements of this nature. General community opposition, CEQA-irrelevant comments, and routine requests for clarification do not constitute areas of controversy. Accordingly, no specific environmental issues were identified as areas of controversy for purposes of this EIR. Responses to the Notice of Preparation of a Draft EIR and input received at the EIR scoping meeting held by the City are summarized in Section 1, *Introduction*.

Summary of Impacts and Mitigation Measures

Table ES-1 outlines the potential environmental impacts of the Proposed Project, the proposed mitigation measures, and residual impacts or significance after mitigation. Impacts are defined as significant and unavoidable impacts that require a statement of overriding considerations, pursuant to Section 15093 of the *CEQA Guidelines* if the Proposed Project is approved; less than significant impacts with mitigation that can be feasibly mitigated to less than significant levels and that require findings to be made under Section 15091 of the *CEQA Guidelines*; less than significant impacts allowed by adopted significance thresholds; and no impact.

Table ES-1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact Statement	Mitigation Measure(s)	Residual Impact
Aesthetics		
Impact AES-1. Implementation of the Proposed Project would facilitate increased development massing and scale on certain parcels in Mountain View, which could affect scenic views. However, scenic views of natural features are largely obscured by existing development and other intervening features in these areas, and compliance with the proposed development standards, the Mountain View General Plan, and the City Code would further ensure the protection of available scenic vistas. Impacts would be less than significant.	No mitigation is required	Less than Significant
Impact AES-2. There are no designated state scenic highways in the vicinity of the Proposed Project. No impact to scenic resources within a state scenic highway would occur.	No mitigation is required	No Impact
Impact AES-3. The Proposed Project would facilitate an increase in building density, massing, and height which could potentially obscure or block public views. The Proposed Project includes new, objective form-based development standards, and visual character and scenic quality would also be protected through adherence to City design guidelines and implementation of goals and policies in the City's General Plan and City Code that address visual character and quality of public views. Impacts would be less than significant.	No mitigation is required	Less than Significant
Impact AES-4. Development facilitated by the Proposed Project would create new sources of light or glare that could adversely affect daytime or nighttime views in the area. Compliance with the 2030 General Plan development standards related to lighting and glare would ensure this impact is less than significant.	No mitigation is required	Less than Significant

Impact Statement	Mitigation Measure(s)	Residual Impact
Impact AES-C-1. Development in the cumulative impact analysis area would not have a substantial adverse effect on a scenic vista, would not substantially damage scenic resources within a state scenic highway, would not degrade existing visual character, and would not adversely affect night sky lighting. Cumulative aesthetic impacts would be less than significant, and the contribution of the Project would not be cumulatively considerable.	No mitigation is required	Less than Significant
Air Quality		
Impact AQ-1. The Proposed Project would not conflict with or obstruct implementation of the 2017 Clean Air Plan. This impact would be less than significant.	No mitigation is required	Less than Significant
Impact AQ-2. Construction facilitated by the Proposed Project would temporarily increase air pollutant emissions, which would affect local air quality. Implementation of Mitigation Measure AQ-1 would reduce construction emissions to a less than significant level. This impact would be less than significant with mitigation incorporated.	**AQ-1 Emission Reduction Measures for Projects Exceeding the Significance Thresholds for Criteria Pollutants.** Project applicants proposing projects that exceed the Air District screening levels shall prepare a project-level criteria air pollutant assessment of construction and operational emissions at the time the project is proposed. The project-level assessment shall either include a comparison of the project with other similar projects where a quantitative analysis has been conducted, or shall provide a project-specific criteria air pollutant analysis to determine whether the project exceeds the Air District's criteria air pollutant thresholds. In the event that a project-specific analysis finds that the project could result in criteria air pollutant emissions that exceed the Air District's significance thresholds, the project applicant shall implement the following emission reduction measures to the degree necessary to reduce the impact to less than the significance thresholds, and shall implement additional feasible measures if necessary to reduce the impact to less than the significance thresholds. 1. The project applicant shall use electric construction equipment when feasible. 2. The project applicant shall ensure that all diesel off-road equipment shall have engines that meet the Tier 4 Final off-road emission standards, as certified by CARB, except as provided for in this section. This requirement shall be verified through submittal of an equipment inventory that includes the following information: (1) Type of Equipment, (2) Engine Year and Age, (3) Number of Years Since Rebuild of Engine (if applicable), (4) Type of Fuel Used, (5) Engine HP, (6) Verified Diesel Emission Control Strategy (VDECS) information if applicable and other related equipment data. A Certification Statement is also required to be made by the Contractor for	Less than Significant with Mitigation

Impact Statement	Mitigation Measure(s)	Residual Impact
	documentation of compliance and for future review by the BAAQMD as necessary. The Certification Statement must state that the Contractor agrees to compliance and acknowledges that a violation of this requirement shall constitute a material breach of contract. The City may waive the requirement for Tier 4 Final equipment only under the following unusual circumstances: if a particular piece of off-road equipment with Tier 4 Final standards is technically not feasible or not commercially available; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or there is a compelling emergency need to use other alternate off-road equipment. For purposes of this mitigation measure, "commercially available" shall mean the availability of Tier 4 Final engines similar to the availability for other large-scale construction projects in the region occurring at the same time and taking into consideration factors such as (i) potential significant delays to critical-path timing of construction for the project and (ii) geographic proximity to the project site of Tier 4 Final equipment. 3. The project applicant shall require that the idling time for off-road and on-road equipment be limited to no more than 2 minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the 2-minute idling limit.	
Impact AQ-3. The Project would facilitate higher-density development and more efficient travel patterns, resulting in lower vehicle miles traveled and reduced operational emissions of criteria pollutants. Therefore, the Project's operational air quality impacts would be less than significant.	No mitigation is required	Less than Significant

Impact Statement	Mitigation Measure(s)	Residual Impact
Impact AQ-4. Operation of the Proposed Project would potentially expose sensitive receptors to substantial pollutant concentrations from existing sources of TACs. Construction activities for individual projects facilitated by the Proposed Project lasting longer than two months or located within 1,000 feet of sensitive receptors could expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant with implementation of mitigation measures AQ-2 and AQ-3.	**AQ-2 Construction Health Risk Assessment.** For individual projects where construction activities would occur within 1,000 feet of sensitive receptors, would last longer than two months, and would not utilize a fleet comprised only of EPA rated Tier 4 engines and/or alternative fuel construction equipment or equivalent, a construction health risk assessment (HRA) shall be performed.[1] The construction HRA shall be performed by a qualified air quality consultant coordinated through the City. The HRA shall be conducted following the Office of Environmental Health Hazards Association's (OEHHA) 2015 Health Risk Guidelines (OEHHA 2015) and Air District guidelines to determine potential risk and compare the risk to the following Air District thresholds: ▪ Increased cancer risk of > 10.0 in a million; ▪ Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute); or If risk exceeds the thresholds, measures such as requiring the use of Tier 4 and/or alternative fuel construction equipment or equivalent shall be implemented to reduce the risk to appropriate levels. **AQ-3 Operational Health Risk Assessment.** For individual projects that would site sensitive receptors within 500 feet of a freeway, high-volume roadway (urban road with 100,000 vehicles/day or rural road with 50,000 vehicles/day), railyard, or rail line using diesel locomotives, the project applicant shall retain a qualified air quality consultant to prepare an HRA to determine the exposure of new sensitive receptors resulting from the project to existing emission sources. The HRA shall be submitted to the City of Mountain View for review and approval. The HRA shall be conducted following the Office of Environmental Health Hazards Association's (OEHHA) 2015 Health Risk Guidelines (OEHHA 2015) and the Air District guidelines to ensure that potential risk does not exceed the following Air District thresholds: ▪ Increased cancer risk of > 10.0 in a million; ▪ Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) To ensure that potential risk does not exceed the above thresholds, project applicants shall implement the health risk reduction measures identified in the HRA. Such measures may include but are not limited to: ▪ Install, operate, and maintain in good working order a central heating and ventilation system or other air take system in the building of a sensitive receptor that would be impacted by the Project, or in each individual residential unit, that meets the	Less than Significant with Mitigation

[1] Sensitive receptors are that segment of the public most susceptible to respiratory distress as a result of poor air quality, such as children under 14, persons over 65, persons engaged in strenuous work or exercise, and people with pre-existing cardiovascular and chronic respiratory diseases. Locations of sensitive receptors include schools, parks and playgrounds, hospitals, day cares, assisted living facilities, and residential communities (CARB 2005).

Impact Statement	Mitigation Measure(s)	Residual Impact
	efficiency standard of the minimum efficiency reporting value (MERV) of 13. The heating and ventilation system should include the following features: installation of a high-efficiency filter and/or carbon filter to minimize particulate and other airborne chemical matter from entering the building. Either high-efficiency particulate absorption filters or American Society of Heating, Refrigeration, and Air-Conditioning Engineers 85 percent supply filters should be used. ▪ Ensure that positive pressure occurs in the building. ▪ Achieve a performance standard of at least one air exchange per hour of fresh outside filtered air. ▪ Achieve a performance standard of at least four air exchanges per hour of recirculation. ▪ Achieve a performance standard of 0.25 air exchanges per hour of unfiltered infiltration if the building is not positively pressurized.	
Impact AQ-5. Development facilitated by the Proposed Project would not create objectionable odors that could affect a substantial number of people. This impact would be less than significant.	No mitigation is required	Less than Significant
Impact AQ-C-1. Development in the cumulative impact analysis area would not result in a cumulatively considerable increase in construction-related criteria air pollutants emissions. The Project would not expose sensitive receptors to substantial pollutant concentrations and would not result in significant odor impacts. With implementation of Mitigation Measures AQ-1 through AQ-3, cumulative air quality impacts would be less than significant. However, the Proposed Project would result in a cumulatively considerable net increase of operation-related criteria pollutants associated with vehicle emissions, and the project's contribution to this cumulative impact would be significant and unavoidable.	Mitigation Measures AQ-1, AQ-2, and AQ-3	Significant and Cumulatively Considerable

Impact Statement	Mitigation Measure(s)	Residual Impact
Biological Resources		
Impact BIO-1. Development facilitated by the Proposed Project may result in direct or indirect impacts to special-status species or their associated habitats, as well as impacts to nesting birds. However, this impact would be less than significant with mitigation incorporated.	**BIO-1 Biological Resources Screening and Assessment**. For development facilitated by the R3 Zoning District Update on undeveloped parcels within 200 feet of a riparian corridor or top of bank, or undeveloped natural area, prior to construction activities and if determined necessary based on preliminary review conducted by City Staff, the City shall require project applicants to engage a qualified biologist (having the appropriate education and experience level) to perform a baseline Biological Resources Screening and Assessment to determine whether the project would have the potential to impact special-status biological resources, inclusive of special-status plants and animals, sensitive vegetation communities (including vernal pools and other wetlands), and critical habitat. If it is determined that the project has no potential to impact biological resources, no further action is required. If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 500 feet around the project footprint, as is feasible, and to determine the potential impacts to those resources. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special-status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, state, and/or federal agencies. If the project would have the potential to impact these resources, the following mitigation measures (Mitigation Measures BIO-2 and BIO-3) shall be incorporated, as applicable, to reduce impacts to a less than significant level. Pending the results of the project-specific biological analysis, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, CDFW, and/or other local, state, and federal agencies may be required. Note that specific surveys described in the mitigation measures below may be completed as part of the project-specific biological analysis where suitable habitat is present. **BIO-2 Endangered/Threatened Special-status Species Habitat Assessments and Protocol Surveys.** For development facilitated by the R3 Zoning District Update where the Project-specific biological analysis (Mitigation Measure BIO-1) determines that suitable habitat may be present for federal- or state-listed, candidate, or proposed species, the City shall require protocol habitat assessments/surveys be completed in accordance with current CDFW and/or USFWS protocols prior to issuance of any construction permits. If, through consultation with the CDFW and/or USFWS, it is determined that protocol habitat assessments/surveys are not required, the project applicant shall be required to complete and document this consultation and submit it to the City prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they	Less than Significant with Mitigation

Impact Statement	Mitigation Measure(s)	Residual Impact
	understand the protocol requirements and shall hire a qualified biologist to conduct protocol surveys. (Note: if a federally and/or state-listed wildlife species will be impacted, federal and/or state take authorization may be required by USFWS and CDFW.) **BIO-3 Endangered/Threatened Animal Species Avoidance and Minimization**. For development facilitated by the R3 Zoning District Update where potential impacts to aquatic and/or terrestrial animal species are identified by the project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1, the following measures shall be applied. 1. Ground disturbance shall be limited to the minimum necessary to complete the project. A qualified biologist shall flag the project limits of disturbance. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance. 2. All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and October 31, if feasible, to avoid impacts to sensitive aquatic species. Any work outside these dates would require project-specific approval from the City and may be subject to regulatory agency approval. 3. All projects occurring within or adjacent to sensitive habitats that may support federally and/or state-listed endangered/threatened species shall have a CDFW- and/or USFWS-approved biologist present during all initial ground disturbing/vegetation clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed, said biologist shall conduct daily pre-activity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the CDFW and/or USFWS, said biologist may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are fully implemented. 4. No endangered/threatened species shall be captured and relocated without express permission from the CDFW and/or USFWS. 5. If at any time during project construction an endangered/threatened species enters the construction site or otherwise may be impacted by the project, all project activities shall cease. A CDFW/USFWS-approved biologist shall document the occurrence and consult with the CDFW and USFWS, as appropriate, to determine whether it was safe for project activities to resume. 6. For all work occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall	

Impact Statement	Mitigation Measure(s)	Residual Impact
	install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete. 7. All vehicle maintenance/fueling/staging shall occur not less than 100 feet from any riparian habitat or water body, including seasonal wetland features. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies. 8. No equipment shall be permitted to enter wetted portions of any affected drainage channel or wetland. 9. At the end of each workday, excavations shall be secured with a cover or a ramp provided to prevent wildlife entrapment. 10. All trenches, pipes, culverts, or similar structures shall be inspected for animals prior to burying, capping, moving, or filling. 11. Considering the potential for the project to impact federally and state-listed species and their habitat, the City shall contact CDFW and USFWS to identify mitigation banks within Santa Barbara County during project development. If the results of the project-specific biological analysis (Mitigation Measure BIO-1) determine that impacts to federally and state threatened or endangered species habitat are expected, City and/or applicant shall explore species-appropriate mitigation bank(s) servicing the region for purchase of mitigation credits. 12. Prior to grading and construction in natural areas of containing suitable upland habitat, a qualified biologist shall conduct a preconstruction survey as determined necessary during the biological analysis (Mitigation Measure BIO-1). The survey should include a transect survey over the entire project disturbance footprint (including access and staging areas), and mapping of suitable habitat features, such as burrows, that are potentially suitable for listed species. If any listed species are detected, no work shall be conducted until the individual(s) leaves the site of their own accord, unless federal and/or state “take” authorization has been issued for relocation. Typical preconstruction survey procedures, such as burrow scoping and burrow collapse, cannot be conducted without federal and state permits. If any life stage of listed species are found within the survey area, the City and/or applicant shall consult with the USFWS and CDFW to determine the appropriate course of	

Impact Statement	Mitigation Measure(s)	Residual Impact
	action to comply with the FESA and CESA, if permits are not already in place at the time of construction.	
Impact BIO-2. Development facilitated by the Proposed Project may directly or indirectly impact riparian habitat and/or protected wetlands. However, this impact would be less than significant.	No mitigation is required	Less than Significant
Impact BIO-3. Development facilitated by the Proposed Project would be subject to the City's policies and requirements protecting biological resources, including protected trees. Impacts would be less than significant.	No mitigation is required	Less than Significant
Impact BIO-4. Development facilitated by the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. There would be no impact.	No mitigation is required	No Impact
Impact BIO-C-1. Development in the cumulative impact analysis area would not have a substantial adverse effect on special-status species, would not result in a significant loss or degradation of riparian habitat or other locally protected biological resources, would not cause a cumulatively significant loss of jurisdictional waters or wetlands, would not substantially interfere with wildlife movement, and would not conflict with adopted conservation plans. Cumulative impacts to biological resources would be less than significant, and the contribution of the Project would not be cumulatively considerable.	No mitigation is required	Less than Significant
Cultural Resources		
Impact CUL-1. Development facilitated by the Proposed Project could adversely affect unidentified historical resources. Impacts to Historical Resources would be less than significance with mitigation incorporated with implementation of the City's existing policies and regulations.	**CUL-1a Historical Resource Protection**. The historical resources evaluation described below shall not be required if a property is already a historical resource as defined by CEQA Guidelines Section 15064.5(a), or has been evaluated as ineligible pursuant to the criteria outlined in CEQA Guidelines Section 15064.5(a)(3), or evaluated in a survey meeting the requirements of 5024.1(g) of the California Public Resources Code. In 2023, the City conducted a reconnaissance survey of the following structures if they were built before 1980: multi-family and nonresidential buildings City-wide, single-family and	Less than significant with mitigation

Impact Statement	Mitigation Measure(s)	Residual Impact
	duplex dwellings outside of R zones, and previously identified resources. The survey identified a select few for intensive-level evaluation and nomination to the City's Register, which shall not require re-evaluation. Other information from the survey may be used, as appropriate, to inform site-specific evaluations. A historical resources evaluation shall be prepared for development projects carried out under the project involving the demolition or substantial physical alteration of a building, structure, object, site, or historic district that is 45 years of age or older. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history (Qualified Architectural Historian). The Qualified Architectural Historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify potential historical resources that could be subject to direct or indirect impacts as a result of the proposed development. All properties 45 years of age or older shall be evaluated for eligibility for listing in the NRHP, CRHR and Mountain View Register of Historic Resources within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. All evaluated properties shall be documented on California Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the City for review and concurrence. The final report shall be submitted to the Northwest Information Center. **CUL 1b Historical Resources Treatment.** If a project would occur on a site containing a historical resource as identified during implementation of Mitigation Measure CUL-1a, impacts shall be mitigated to historical resources identified within a proposed development site. Application of mitigation shall be overseen by a Qualified Architectural Historian and/or historic architect meeting the PQS. Mitigation must include avoidance, or preservation, rehabilitation, restoration, or reconstruction of the resource consistent with the Secretary of the Interior's Standards for the Treatments of Historic Properties (Standards) in accordance with the City's Standard Conditions of Approval. In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR Section 15126.4[b][1]). A report identifying and specifying the project description, treatment of character-defining features, and compliance with the Standards shall be submitted to the City for review and approval prior to the issuance of permits. If historical resources are identified on a development site and required compliance with the Standards and/or avoidance is not possible, then a project specific EIR will be required with project specific mitigation measures.	

Impact Statement	Mitigation Measure(s)	Residual Impact
Impact CUL-2. Development facilitated by the Proposed Project could adversely affect archaeological resources. Impacts to archaeological resources would be less than significant with mitigation incorporated with implementation of the City's policies and regulations.	**CUL-2a Archaeological Resources Assessments.** Prior to approval of a project that involves substantial ground disturbance activities such as grading, trenching, or excavation, an Archaeological Resources Assessment shall be prepared under the supervision of an archaeologist that meets the Secretary of the Interior's Professional Qualification Standards in either prehistoric or historic archaeology (Qualified Archaeologist) as defined in Code of Federal Regulations, Title 36, Part 61). Projects involving minor ground disturbance such as landscaping, planting, pruning, repaving, or other activities with limited ground disturbance would not require an Archaeological Resources Assessment. Archaeological Resources Assessments shall include a California Historical Resources Information System records search at the Northwest Information Center (NWIC), a Sacred Lands File search maintained by the Native American Heritage Commission, intensive-level pedestrian survey, and archaeological sensitivity analysis utilizing review of ethnographic data, and historical, geological, and soil maps, aerial imagery, and geotechnical reports. A Qualified Archaeologist shall identify known archaeological resources and classify the project site as having high, moderate, or low sensitivity for unknown archaeological resources. The assessment shall also include recommendations for additional studies and/or mitigation, as necessary. The assessment shall be completed prior to project approval. The final report must be submitted to the Northwest Information Center. If the Archaeological Resources Assessment identifies resources that may be affected by the project, an Extended Phase I testing program and/or Phase II testing and evaluation may be required, as determined by the Qualified Archaeologist, to identify the extent and significance of the resource. Extended Phase I testing and Phase II testing and evaluation must be completed prior to project construction. If resources are determined eligible for the NRHP and/or CRHR or unique archaeological resources as defined by PRC 21083.2(g), avoidance or preservation-in-place may reduce impacts to a less than significant level. If avoidance is not possible, then a project specific EIR will be required with project specific mitigation measures. The City will review and approve reports and ensure that mitigation measures are implemented as appropriate prior to or during construction. **CUL2b Unanticipated Discoveries.** In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and a Qualified Archaeologist shall be contacted immediately to evaluate the resource. If the resource is determined by the Qualified Archaeologist to be of Native American origin, then a Native American representative shall also be contacted to	Less than Significant with Mitigation

Impact Statement	Mitigation Measure(s)	Residual Impact
	participate in the consultation concerning the resource. If the PQS archaeologist determines it to be appropriate, in coordination with the Native American representative, archaeological testing for NRHP and/or CRHR eligibility shall be completed. If the resource proves to be eligible for the NRHP and/or CRHR and significant impacts to the resource cannot be avoided via project redesign, a PQS archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. The data recovery plan shall be implemented prior to any additional disturbances of potentially sensitive deposits. The City shall review and approve all archaeological work prior to implementation and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Section 15126.4(b)(3)(C).	
Impact CUL-3. Ground-disturbing activities associated with development under the Proposed Project could result in damage to or destruction of human burials. Impact would be less than significant with mitigation throughout adherence to State Health and Safety Code Section 7050.5, 7051, and 7054 and Public Resources Code Section 5097.98.	No mitigation is required	Less than Significant
Impact CUL-C-1. Development in the cumulative impact analysis area would not result in a cumulatively considerable impact to historical resources, would not cause a significant cumulative disturbance of archaeological resources, and would not result in a cumulatively significant impact to human remains. With implementation of Mitigation Measures CUL-1a and 1b, and CUL-2a and 2b, cumulative cultural resource impacts would be less than significant, and the contribution of the Project would not be cumulatively considerable.	Mitigation Measures CUL-1a and 1b, and CUL-2a and 2b	Less than Significant

Impact Statement	Mitigation Measure(s)	Residual Impact
Geology and Soils		
Impact GEO-1. None of the R3 Zoning District Update sites are within an Alquist-Priolo zone, so surface or ground rupture would not occur. Development could experience seismic hazards including ground shaking, liquefaction, or landslides, posing risks to structures and public safety. However, compliance with applicable regulations would reduce these risks. Impacts would be less than significant.	No mitigation is required	Less than Significant
Impact GEO-2. With adherence to applicable laws and regulations, the Proposed Project would not result in substantial soil erosion or the loss of topsoil. This impact would be less than significant.	No mitigation is required	Less than Significant
Impact GEO-3. The Proposed Project would not include septic tanks or alternative wastewater disposal systems. No impact would occur.	No mitigation is required	No Impact
Impact GEO-4. Development facilitated by the Proposed Project has the potential to impact paleontological resources. Nonetheless, this impact would be less than significant with mitigation incorporated.	**GEO-1 Paleontological Resources Protection.** For projects that involve substantial excavation in undisturbed sediments greater than 2 feet below the surface in areas mapped as alluvial fan and fluvial deposits (Pleistocene), or greater than 5 feet below the surface in areas mapped as artificial fill, artificial levee fill, artificial stream channels, Bay Mud, basin deposits, flood-plain deposits, natural levee deposits, or alluvial fan and fluvial deposits (Holocene), as mapped in Figure 4.5-4, the applicant shall prepare and implement a Paleontological Resources Mitigation and Monitoring Plan (PRMMP) or implement the following measures: ▪ **Worker Environmental Awareness Program (WEAP) Training.** The Qualified Paleontologist or their designee shall conduct WEAP training for all construction personnel involved in ground-disturbing activities, regarding the appearance of fossils and the procedures for notifying paleontological staff in the event that fossils are discovered by on-site personnel. ▪ **Construction Monitoring.** Monitoring during ground construction activities (i.e., grading, trenching, foundation work, and other excavations) shall be conducted by a qualified paleontological monitor, who is defined as an individual who meets the minimum qualifications per standards set forth by the SVP (2010), which includes a B.S. or B.A. degree in geology or paleontology with one year of monitoring experience and knowledge of collection and salvage of paleontological resources. Full-time paleontological monitoring shall occur for ground-disturbing activities in	Less than Significant with Mitigation

Impact Statement	Mitigation Measure(s)	Residual Impact
	undisturbed sediments with high paleontological sensitivity. Initial, part-time monitoring shall occur in undisturbed sediments with undetermined paleontological sensitivity to determine whether the sediments should be considered high- or low-sensitivity. The frequency and duration of this initial part-time monitoring shall be at the discretion of the Qualified Paleontologist. If the Qualified Paleontologist determines that the monitoring methods or schedule should be altered based on the specific geologic conditions at the surface or at depth (e.g., reduced/increased in frequency, ceased entirely), the Qualified Paleontologist may recommend such changes to the City, and those changes shall not be enacted until the City's approval is received. ▪ **Paleontological Discovery.** In the event a fossil is discovered by construction personnel or the paleontological monitor, all work in the immediate vicinity of the find shall cease and the Qualified Paleontologist shall be contacted to evaluate the find before re-starting work in the area. If it is determined that the fossil(s) is (are) scientifically significant, then it shall be salvaged, identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps.	
Impact GEO-C-1. Development in the cumulative impact analysis area would not result in a cumulatively significant impact related to seismic ground shaking or surface rupture, liquefaction or other soil instability hazards, landslides, soil erosion or loss of topsoil, or soils incapable of supporting wastewater disposal systems; however, cumulative development could result in a potentially significant impact to undiscovered paleontological resources. With implementation of applicable standard conditions of approval and Mitigation Measure GEO-1, cumulative geology and soils impacts would be less than significant, and the contribution of the Project would not be cumulatively considerable.	Mitigation Measure GEO-1	Less than Significant

Impact Statement	Mitigation Measure(s)	Residual Impact
Greenhouse Gas Emissions		
Impact GHG-1. The Proposed Project would not be consistent with BAAQMD's building and transportation thresholds. Mitigation measures are infeasible; therefore, this impact would remain significant and unavoidable.	No mitigation measure is feasible to reduce the project impacts.	Significant and Unavoidable
Impact GHG-2. The Proposed Project would not conflict with Plan Bay Area 2050 or the Mountain View General Plan. However, the Proposed Project would potentially conflict with the 2022 Scoping Plan. Mitigation measures are infeasible; therefore, this impact would remain significant and unavoidable.	No mitigation measure is feasible to reduce the project impacts.	Significant and Unavoidable
Impact GHG-C-1. Development in the cumulative impact analysis area would result in a cumulatively significant contribution to global greenhouse gas emissions due to inconsistency with State climate goals and applicable project-level emission thresholds. Cumulative greenhouse gas impacts would be significant and unavoidable, and the contribution of the Project would be cumulatively considerable.	No mitigation measures are feasible to reduce the project impacts.	Significant and Cumulatively Considerable
Hazards and Hazardous Materials		
Impact HAZ-1. Implementation of the Proposed Project would facilitate new residential development on the proposed rezoning parcels. Proposed residential development would not involve routine transportation, use, or disposal of hazardous materials. However, construction of new residences could result in an increase in the overall routine, transport, use, and disposal of hazardous materials near residential land uses. Nonetheless, required compliance with applicable regulations related to hazardous materials would minimize the risk of releases and exposure to these materials. Impacts would be less than significant.	No mitigation is required	Less than Significant

Impact Statement	Mitigation Measure(s)	Residual Impact
Impact HAZ-2. Development facilitated by the project may result in the release of hazardous materials within 0.25 mile of a school. However, compliance with regional and federal regulations related to hazardous materials would minimize the risk of releases and exposure to these materials. This impact would be less than significant.	No mitigation is required	Less than Significant
Impact HAZ-3. Development facilitated by the project could result in development on sites listed pursuant to Government Code Section 65962.5. However, compliance with applicable regulations relating to site assessment and remediation, and implementation of Mitigation Measure HAZ-1, would minimize impacts from development, resulting in a less than significant impact with Mitigation.	**HAZ-1 Phase I Environmental Site Assessment.** Prior to the start of construction (demolition or grading), the project applicant shall retain a qualified environmental professional (EP), as defined American Society for Testing and Materials Standard (ASTM) E1527 to prepare a project-specific Phase I Environmental Site Assessment (ESA) in accordance with standard ASTM methodologies, to assess the land use history of the Project site. The Phase I assessment shall include a records review of appropriate federal, State, and local databases within ASTM-listed search distances regarding hazardous materials use, storage, or disposal at the given site, a review of historical topographic maps and aerial photographs, a site reconnaissance, interviews with persons knowledgeable about the sites historical uses, and review of other relevant existing information that could identify the potential existence of Recognized Environmental Conditions, including hazardous materials, or contaminated soil or groundwater. If no Recognized Environmental Conditions are identified, then no further action would be required. If Recognized Environmental Conditions are identified and the Phase I assessment recommends further action, the Project applicant shall conduct the appropriate follow-up actions, which may include preparation of a Phase II ESA, further records review, sampling of potentially hazardous materials, and possibly site cleanup. In the event that site cleanup is required, the Project shall not proceed until the site has been cleaned up to the satisfaction of the appropriate regulatory agency (e.g., DTSC, RWQCB, or SCCEHD) such that the regulatory agency issues a No Further Action letter or equivalent. As part of the Phase II ESA, the qualified environmental consultant (PG or PE) shall screen the analytical results against the San Francisco Bay Regional Water Quality Control Board environmental screening levels (ESL). These ESLs are risk-based screening levels under various depth and land use scenarios. The lead agency shall review, approve, and implement recommendations of the Phase II ESA prior to demolition and grading (construction).	Less than Significant with Mitigation

Impact Statement	Mitigation Measure(s)	Residual Impact
Impact HAZ-4. Development facilitated by the Project would be located within an airport land use plan. However, people residing or working in the project area would not be exposed to airport safety hazards or excessive noise. Impacts would be less than significant.	No mitigation is required	Less than Significant
Impact HAZ-5. Future development facilitated by the Proposed Project would not impair implementation of an adopted emergency response or evacuation plan. This impact would be less than significant**.**	No mitigation is required	Less than Significant
Impact HAZ-6. The R3 Zoning District Update sites are not located on or near wildlands and would not expose people or structures to wildland fires. No impact would occur.	No mitigation is required	No Impact
Impact HAZ-C-1. Development in the cumulative impact analysis area would not result in a cumulatively significant increase in hazards associated with the use, transport, storage, or disposal of hazardous materials, would not create a significant hazard to the public or the environment related to listed hazardous materials sites, would not expose sensitive receptors such as schools to substantial hazardous emissions, would not result in significant airport-related safety hazards, and would not impair implementation of emergency response or evacuation plans. With implementation of applicable standard conditions of approval and Mitigation Measure HAZ-1, cumulative hazards and hazardous materials impacts would be less than significant, and the contribution of the Project would not be cumulatively considerable.	Mitigation Measure HAZ-1	Less than Significant
Hydrology and Water Quality		
Impact HYD-1. The Project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. This impact would be less than significant.	No mitigation is required	Less than Significant

Impact Statement	Mitigation Measure(s)	Residual Impact
Impact HYD-2. The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. This impact would be less than significant.	No mitigation is required	Less than Significant
Impact HYD-3. The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site. This impact would be less than significant.	No mitigation is required	Less than Significant
Impact HYD-4. The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in flooding on or off site. This impact would be less than significant.	No mitigation is required	Less than Significant
Impact HYD-5. The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. This impact would be less than significant.	No mitigation is required	Less than Significant
Impact HYD-6. The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows and would not release of pollutants due to project inundation. Impacts would be less than significant.	No mitigation is required	Less than Significant

Impact Statement	Mitigation Measure(s)	Residual Impact
Impact HYD-7. The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. This impact would be less than significant.	No mitigation is required	Less than Significant
Impact HYD-C-1. Development in the cumulative impact analysis area would not substantially degrade surface or groundwater quality, would not result in a significant increase in erosion, siltation, or polluted runoff, would not substantially alter drainage patterns or increase flood hazards, and would not result in a cumulatively significant impact on groundwater resources or water supply. Cumulative hydrology and water quality impacts would be less than significant, and the contribution of the Project would not be cumulatively considerable.	No mitigation is required	Less than Significant
Land Use and Planning		
Impact LUP-1. Development facilitated by the Project would not physically divide an established community. No impact would occur.	No mitigation is required	No Impact
Impact LUP-2. Implementation of the Proposed Project would be consistent with applicable regional plans, local Precise Plans, and relevant regulations. This impact would be less than significant.	No mitigation is required	Less than Significant
Impact LUP-C-1. Development in the cumulative impact analysis area would not result in the physical division of an established community and would not substantially conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Cumulative land use and planning impacts would be less than significant, and the contribution of the Project would not be cumulatively considerable.	No mitigation is required	Less than Significant

Impact Statement	Mitigation Measure(s)	Residual Impact
Noise		
Impact NOI-1. Construction of individual development facilitated by the Project would temporarily produce high noise levels, potentially affecting nearby noise-sensitive land uses. Operation of development facilitated by the Project would also increase transportation noise. With implementation of the City of the Mountain View's Standard Conditions of Approval and Mitigation Measure NOI-1, Impacts would be Less than significant with mitigation.	**NOI-1 Pile Driving Noise Reduction**. If pile driving activities are proposed within 50 feet of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental health care facilities, places of worship, libraries and museums, transient lodging, and office building interiors) the following measures shall be implemented: ▪ The Project applicant shall prepare a pile driving noise reduction plan, which shall be submitted to the City for approval prior to the start of construction. The plan will include but is not limited to the following measures: With approval of the Project structural engineer, pile holes will be pre-drilled to minimize the number of impacts necessary to seat the pile. ▪ Pile driving shall be scheduled to have the least impact on nearby sensitive receptors, where feasible (e.g., operating during mid-day hours, avoiding operation during school hours, etc.). ▪ Pile drivers with the best available noise control technology will be used. For example, pile driving noise control may be achieved by shrouding the pile hammer point of impact, by placing resilient padding directly on top of the pile cap, and/or by reducing exhaust noise with a sound-absorbing muffler. ▪ Alternatives to impact hammers, such as caisson drilling (drilling piles), vibratory pile driving, oscillating or rotating pile installation methods, and jetting or partial jetting of piles into place using a water injection at the tip shall be used, where feasible.	Less than Significant with Mitigation
Impact NOI-2. Construction of individual development facilitated by the Project could temporarily generate groundborne vibration, potentially affecting adjacent sensitive land uses. Even with implementation of the City of Mountain View Standard COAs and Mitigation Measure NOI-2, impacts would be less than significant with mitigation	**NOI-2 Pile Driver Vibration Reduction Measures.** If pile driving activities are proposed within 135 feet of an historic structure or 100 feet from a timber/masonry structure (residential building) or Engineered Concrete/Masonry structure (commercial building), the following measures shall be implemented: ▪ The Project applicant shall retain a qualified consultant to prepare a project-specific construction vibration impact analysis. ▪ Pile driving vibration shall not exceed 0.12 in/sec PPV at buildings extremely susceptible to vibration damage (i.e., historic buildings); groundborne vibration levels exceeding 0.2 in/sec PPV at non-engineered timber and masonry buildings (i.e., residential buildings) and engineered Concrete/Masonry structure (commercial building). ▪ Provided the analysis concludes vibration levels do not exceed 0.12 in/sec PPV at buildings extremely susceptible to vibration damage (i.e., historic buildings); groundborne vibration levels exceeding 0.2 in/sec PPV at non-engineered timber and masonry buildings (i.e., residential buildings) or engineered Concrete/Masonry	Less than Significant with Mitigation

Impact Statement	Mitigation Measure(s)	Residual Impact
	structure (commercial building), construction may proceed without additional measures. ▪ Provided the analysis concludes that pile driving vibration levels exceed 0.12 in/sec PPV at buildings extremely susceptible to vibration damage (i.e., historic buildings); groundborne vibration levels exceeding 0.2 in/sec PPV at non-engineered timber and masonry buildings (i.e., residential buildings) or engineered Concrete/Masonry structure (commercial building), additional measures shall be implemented to reduce vibration levels below the standard, as determined by the qualified consultant. These measures may include, but not be limited to, pre-drilling pile holes, utilizing a vibratory pile driver, or performing pile driving at a further distance from the noise-sensitive land use to reduce vibration levels. ▪ The analysis of nighttime pile driving vibration shall be completed in accordance with industry standards. The analysis shall consider the type of pile driver to be used and potential vibration levels at vibration-sensitive receivers located within 160 feet of the R3 Zoning District Update Site.	
Impact NOI-3. Development facilitated by the Proposed Project would not be within Airport noise contours; therefore, development facilitated by the Proposed Project would not be exposed to excess noise levels associated with airports and there would be no impact.	No mitigation is required	No Impact
Impact NOI-C-1. Development in the cumulative impact analysis area would not result in a cumulatively significant increase in construction noise, would not result in significant cumulative operational noise from on-site or off-site sources, would not cause a cumulatively significant groundborne vibration impact, and would not result in a cumulatively considerable airport-related noise impact. With implementation of the City's Standard Conditions of Approval and Mitigation Measures NOI-1 and NOI-2, cumulative noise impacts would be less than significant with mitigation, and the contribution of the Project would not be cumulatively considerable.	Mitigation Measures NOI-1 and NOI-2	Less than Significant

Impact Statement	Mitigation Measure(s)	Residual Impact
Population and Housing		
Impact POP-1. Development facilitated by the Project would accommodate additional residents and dwelling units but would not exceed Plan Bay Area 2050 population and housing forecasts. Although development facilitated by the Project would exceed the required planned housing pursuant to the City's most recent RHNA and anticipated within the City's 6th Cycle Housing Element, new housing built pursuant to the Project would be subject to density and development standards of the R3 District which, if adopted, would not be unplanned growth. Therefore, the Project would not result in unplanned population growth and impacts would be less than significant.	No mitigation is required	Less than Significant
Impact POP-2. Development facilitated by the Project could displace existing housing or people, necessitating the construction of replacement housing elsewhere. However, this would be substantially offset by the total number of units added as a result of Project implementation. impacts would be less than significant.	No mitigation is required	Less than Significant
Impact POP-C-1. Development in the cumulative impact analysis area would not induce substantial unplanned population growth and would not result in a cumulatively significant displacement of people or housing. Cumulative population and housing impacts would be less than significant, and the contribution of the Project would not be cumulatively considerable.	No mitigation is required	Less than Significant
Public Services and Recreation		
Impact PS-1. Development facilitated by the Project would result in increased population and building square footage in Mountain View. This would increase demand for fire protection; however, it would not result in the need for new or expanded fire protection facilities. This impact would be less than significant.	No mitigation is required	Less than Significant

Impact Statement	Mitigation Measure(s)	Residual Impact
Impact PS-2. Development facilitated by the Project would result in an increase of population within Mountain View. This would increase demand for police protection services. However, this increase would not result in the need for new or expanded police facilities. This impact would be less than less than significant.	No mitigation is required	Less than Significant
Impact PS-3. Development facilitated by the Project would result in an increase in population, including school-aged children served by MVWSD, LASD, and MVLA. Nonetheless, student generation of the proposed Project would be accommodated through existing policies and statutory fee requirements. Impacts would be less than significant	No mitigation is required	Less than Significant
Impact PS-4. Development facilitated by the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios. Impacts would be less than significant.	No mitigation is required	Less than Significant
Impact PS-5. Development facilitated by the Project would not result in substantial adverse physical impacts associated with the construction of new or physically altered library facilities to maintain acceptable service objectives, as new development would be urban infill that would occur gradually over time. Impacts would be less than significant.	No mitigation is required	Less than Significant
Impact PS-C-1. Development in the cumulative impact analysis area would not result in a cumulatively significant impact on fire protection services, police protection services, school facilities, library services, or parks and recreational facilities. Cumulative public services impacts would be less than significant, and the contribution of the Project would not be cumulatively considerable.	No mitigation is required	Less than Significant

Impact Statement	Mitigation Measure(s)	Residual Impact
Transportation		
Impact TRA-1. The Project would not include modifications to existing transit, roadway, bicycle, or pedestrian facilities and would not interfere with transportation projects identified in existing programs, plans, ordinances, or policies. The Project would allow for increased residential densities proximate to transportation infrastructure, which would support the City's General Plan policies. Accordingly, the Project would have a less than significant impact related to conflicts with programs, plans, ordinances, or policies addressing the circulation system.	No mitigation is required	Less than Significant
Impact TRA-2. The Project would increase allowable residential densities throughout Mountain View, promoting higher density residential development compared to existing conditions, which would result in citywide VMT reductions. Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3(b). This impact would be less than significant.	No mitigation is required	Less than Significant
Impact TRA-3. Individual residential developments that occur as a result of the Project would be subject to City and Mountain View Fire Department design standards which would ensure individual developments would not result in substantial transportation hazards or inadequate emergency access. This impact would be less than significant.	No mitigation is required	Less than Significant
Impact TRA-C-1. Development would not result in a cumulatively significant conflict with applicable circulation plans, policies, or programs and would not create cumulatively significant transportation safety hazards or inadequate emergency access; however, cumulative development would result in a significant and unavoidable increase in VMT. Accordingly, cumulative transportation impacts related to VMT would be significant and unavoidable, and the contribution of the Project would be cumulatively considerable.	No project-level mitigation measures are feasible to reduce the project impacts.	Significant and Cumulatively Considerable

Impact Statement	Mitigation Measure(s)	Residual Impact
Tribal Cultural Resources		
Impact TCR-1. Future development facilitated by the Proposed Project could affect previously unidentified tribal cultural resources. However, this impact would be less than significant with mitigation.	**TCR-1 Suspension of Work Around Potential Tribal Cultural Resources.** In the event archaeological resources of Native American origin are identified during construction on the Change Area sites, all earth-disturbing work within 50 feet of the find shall be suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City of Mountain View, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with local Native American group(s). The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery. The City of Mountain View shall review and approve the plan prior to implementation.	Less than Significant with Mitigation
Impact TCR-C-1. Development in the cumulative impact analysis area would not result in a cumulatively significant disturbance of tribal cultural resources. cumulative tribal cultural resources impacts would be less than significant, and the contribution of the Project would not be cumulatively considerable.	No mitigation is required	Less than Significant
Utilities and Service Systems		
Impact UTIL-1. Development facilitated by the Proposed Project would increase demand for utility infrastructure. However, this would represent minor, in-corridor utility connections and routine upgrades, and would not require substantial new or expanded facilities, consistent with planned capital improvements. Therefore, with compliance with existing regulations and implementation of planned capital improvements, the existing utility systems for water, stormwater, electric power, natural gas, and telecommunication facilities in Mountain View would have sufficient capacity to serve the project, and the wastewater treatment provider	No mitigation is required	Less than Significant

Impact Statement	Mitigation Measure(s)	Residual Impact
would have sufficient capacity to accommodate project-related demand. Impacts associated with relocation or construction of new utility infrastructure would be less than significant**.**		
Impact UTIL-2. The Proposed Project would facilitate growth and increase water demand in the City of Mountain View. Sufficient water supply is available to serve existing and anticipated growth in Mountain View, including for the Proposed Project, during normal, single dry, and multiple dry year conditions. This impact would be less than significant.	No mitigation is required	Less than Significant
Impact UTIL-3. Development facilitated by the project would increase the amount of solid waste that is transported to and disposed of at the Kirby Canyon Recycling and Disposal Facility. This solid waste would not exceed state or local standards or the capacity of local infrastructure. Impacts would be less than significant.	No mitigation is required	Less than Significant
Impact UTIL-C-1. Development in the cumulative impact analysis area would not result in a cumulatively significant impact on water supply infrastructure or water demand, wastewater treatment capacity, stormwater facilities, solid waste disposal, telecommunications services, electricity supply, or natural gas facilities. Cumulative utilities impacts would be less than significant, and the contribution of the Project would not be cumulatively considerable.	No mitigation is required	Less than Significant

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1 Introduction

This Environmental Impact Report (EIR) evaluates the potential environmental impacts associated with the City of Mountain View's ("City") R3 Zoning District Update (herein referred to as the "Proposed Project" or "Project"). The Proposed Project would involve amendments to the City's Zoning Code, Zoning Map and P(38) El Camino Real Precise Plan in order to comply with the City's Housing Element.

This document is a Program EIR. This section discusses: (1) the purpose of this EIR; (2) the purpose and legal basis for preparing an EIR; (3) the type of environmental document prepared; (4) documents incorporated by reference; (5) future streamlining and tiering opportunities; (6) the public review and participation process; (7) EIR content; (8) the scope of the Program EIR; (9) the lead, responsible, and trustee agencies pursuant to the California Environmental Quality Act (CEQA); and (10) an overview of the environmental review process required under CEQA.

The Proposed Project is described in detail in Chapter 2, *Project Description*.

1.1 Statement of Purpose

This Program EIR has been prepared in compliance with the CEQA Statutes and Guidelines (see *CEQA Guidelines* Section 15121[a]). In general, the purpose of an EIR is to:

1. Analyze the environmental effects of the adoption and implementation of the Project;
2. Inform decision-makers, responsible and trustee agencies, and members of the public as to the range of the potential environmental impacts of the Project;
3. Recommend a set of measures to mitigate significant adverse impacts; and
4. Analyze a range of reasonable alternatives to the proposed Project.

As the lead agency for preparing this Program EIR, the City of Mountain View will rely on the EIR analysis of environmental effects in its review and consideration of the Proposed Project prior to its approval.

1.2 Purpose and Legal Authority

The Proposed Project requires the discretionary approval of the City of Mountain View; therefore, the project is subject to the environmental review requirements of California Public Resources Code Section 21000, commonly referred to as CEQA.

In accordance with *CEQA Guidelines* Section 15121 (California Code of Regulations, Title 14), the purpose of this EIR is to serve as an informational document that:

> "...will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."

This Program EIR is to serve as an informational document for the public and City of Mountain View decision makers. The process will include public hearings before the Planning Commission and City Council to consider certification of a Final Program EIR and approval of the Proposed Project.

1.3 Program EIR Background

This document is a Program EIR. *CEQA Guidelines* Section 15168(a) states that:

> "A Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically; (2) as logical parts in a chain of contemplated actions; (3) in connection with issuance of rules, regulations, plans, or other general criteria, to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

As a programmatic document, this EIR presents a citywide assessment of the impacts of the Proposed Project. Analysis of site-specific impacts of individual projects is not required in a Program EIR, unless components of the program are known in sufficient detail. Many specific projects are not currently defined to the level that would allow for such an analysis. Individual specific environmental analysis of each project will be performed as necessary by the City prior to each project being considered for approval. This Program EIR serves as a first-tier CEQA environmental document supporting second-tier environmental documents, if required, for development facilitated by the Project.

Project applicants implementing subsequent projects may undertake future environmental review depending on the results of the analysis in this Program EIR and requirements of the mitigation measures. If project applicants are required to prepare subsequent environmental documents, they may reference the appropriate information from this Program EIR regarding secondary effects, cumulative impacts, broad alternatives, and other relevant factors. If the City finds that implementation of a later activity would have no new effects and that no new mitigation measures would be required, that activity would require no additional CEQA review and a consistency finding would be prepared. Where subsequent environmental review is required, such review would focus on significant effects specific to the project, or its site, that have not been considered in this Program EIR (*CEQA Guidelines* Section 15168).

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. *CEQA Guidelines* Section 15151 provides the following standards related to the adequacy of an EIR:

> "An Environmental Impact Report should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to decide which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have looked not for perfection; but for adequacy, completeness, and a good faith effort at full disclosure."

CEQA Guidelines Section 15146 provides the following additional standards related to the adequacy of an EIR:

> The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.

(a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.

(b) An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption, or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.

1.4 Documents Incorporated by Reference

As permitted by *CEQA Guidelines* Section 15150, this EIR has referenced technical studies, analyses, and previously certified environmental documentation. Information from these documents has been briefly summarized in the appropriate section(s). Additionally, as appropriate, these documents have been added to the EIR as appendices, and other documents and sources that have been used in the preparation of this EIR are listed in Section 7, *References and Preparers*.

1.5 Streamlining and Tiering Opportunities

The intent of this Program EIR is to enable development facilitated by the Project to use streamlining and tiering opportunities set forth in the *CEQA Guidelines* Section 15183.3 for future CEQA compliance.

The lead agency may use this Program EIR for the purposes of allowed CEQA tiering (PRC Sections 21068.5, 21093-21094, *CEQA Guidelines* 15152, 15163, 15164, 15168, and 15385). Tiering is the process by which general matters and environmental effects in an EIR prepared for a policy, plan, program, or ordinance are relied upon by a narrower second-tier or site-specific EIR or other CEQA document (PRC Section 21068.5). Moreover, by tiering from this Program EIR (once certified by the City Council), a later tiered EIR would not be required to examine effects that (1) were mitigated or avoided in this EIR, (2) were examined at a sufficient level of detail in this Program EIR to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project (PRC Section 21094).

CEQA Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by zoning, community plan or general plan policies for which an EIR was certified. For these projects, the project-level environmental review is only required to analyze effects on the environment that are specific to the project or to the project site and were not addressed as significant effects in a prior planning-level or programmatic EIR unless new information shows the effects will be more significant than described in the prior EIR. Moreover, the project-level environmental review is not required to consider potentially significant environmental effects of the project that may be reduced to a less-than-significant level by applying uniformly applicable development policies or standards adopted by the city, county, or the lead agency.

1.6 Public Review and Participation Process

The City of Mountain View distributed a Notice of Preparation (NOP) of the Program EIR for a 30-day agency and public review period that commenced on July 9, 2025, and closed on August 11, 2025. The City held a scoping meeting on July 23, 2025, during the regularly-scheduled Planning

Commission hearing. The meeting was aimed at providing information about the Proposed Project to members of public agencies, interested stakeholders, and residents/community members and at providing an opportunity for interested parties to provide verbal comments on the scope of the environmental issues to be addressed in the EIR.

The City received four written comment letters from public agencies, three written comment letters from organizations, and seven written comment letters from individuals. There were also several verbal comments received at the scoping meeting. Most comments were on the Project itself; as these comments do not pertain to the scope of the EIR, they are not listed here. The comments related to the environmental impacts of the Project are summarized in Table 1-1 below.

Table 1-1 NOP Comments and EIR Response

Commenter	Comment/Request	How and Where It Was Addressed
Agency Comments		
City of Sunnyvale Department of Public Works	According to the Proposed Project's full buildout, the commenter states that the Project would trigger the Congestion Management Program (CMP) requirement and a Transportation Analysis (TA). The City would also like to review the TA scope.	Transportation impacts are discussed in Section 4.13, *Transportation and Traffic*.
	Even though CEQA no longer requires LOS analysis, the City requests operational evaluation of Sunnyvale intersections per VTA TA and TOA Guidelines. Intersections with ≥10 Project trips per lane should be studied, especially those along key Sunnyvale corridors such as Moffett Park Dr, Maude Ave, Mary Ave, Evelyn Ave, Bernardo Ave, El Camino Real, and Heatherstone Way. Analysis should cover AM (7–10 a.m.) and PM (4–7 p.m.) peak hours under existing, background, and cumulative scenarios.	
	Suggests including a corridor-level analysis for El Camino Real, Maude Avenue, and Evelyn Avenue..	
	Requests inclusion of approved projects, pending projects, and/or annual growth rates from Sunnyvale and neighboring cities to estimate background and cumulative traffic volumes, consistent with CMP TA Guidelines. Sunnyvale can provide a current project list.	
	Traffic analysis should evaluate transit service availability and capacity, impacts on service from traffic delays, and the need for transit access improvements. Also, must assess bicycle and pedestrian facilities' availability, potential effects, and planned improvements. Sunnyvale can provide bike/ped facility maps..	
	TA should identify Project impacts on Sunnyvale facilities for existing, background, and cumulative scenarios, propose feasible improvements, and determine the Project's proportional financial contribution to restoring acceptable operating conditions. Sunnyvale wants to discuss improvements before the report is finalized.	

Commenter	Comment/Request	How and Where It Was Addressed
	Project analysis should review truck routes and potential construction-related impacts to Sunnyvale streets and regional corridors, with mitigation as needed.	
	The cumulative analysis should include regional projects listed in the Valley Transportation Plan (VTP) and Sunnyvale local improvements from the City's CIP and Traffic Impact Fee Study. If such improvements are counted as mitigations, their construction schedule relative to Project completion must be clarified.	
	Because of the Project's size and likely effects on Sunnyvale's street network, Sunnyvale requests the opportunity to review the draft TA report, per CMP guidelines.	
	Operational impacts to Santa Clara County facilities should incorporate improvements identified in the County Expressway Planning Study.	
San Francisco Public Utilities Commission (SFPUC)	The SFPUC's east–west water transmission right-of-way in Mountain View prohibits building structures, including housing, to protect infrastructure and allow maintenance access. The proposed zoning map update should exclude SFPUC property in accordance with this policy.	This comment suggests potential zoning map changes, which are a matter of policy and implementation rather than an environmental impact under CEQA. Please refer to Section 4.9, *Land Use and Planning*, for a discussion on Project consistency with applicable plans and policies, and Section 4.15, *Utilities and Service Systems*, for a discussion of Project impacts on SFPUC resources.
Native American Heritage Commission (NAHC)	States that the Proposed Project is subject to the requirements and provisions under Assembly Bill (AB 52) for tribal cultural resources.	Consultation required by AB 52 was carried out by the City of Mountain View. Subsequent issues are discussed in Section 4.14, *Tribal Cultural Resources*, of this EIR.
County of Santa Clara Roads and Airports Department	The Traffic Impact Analysis (TIA) should incorporate planned grade separation projects at Central/Rengstorff and Central/Castro (including Mountain View Transit Center improvements, Castro Street full closure, and potential pedestrian/bike grade separation at Central/Castro). It should also include the future Class I shared-use path along Central Expressway per the County Active Transportation Plan, assess pedestrian/bicycle connectivity across the Caltrain tracks, analyze all signalized intersections on Central Expressway between San Antonio and Bernardo, and follow the latest VTA TIA and TOA Guidelines for LOS analysis.	Transportation impacts are discussed in Section 4.13, *Transportation and Traffic*.

Commenter	Comment/Request	How and Where It Was Addressed
Santa Clara Valley Water District (Valley Water)	The EIR should include a Water Supply Assessment pursuant to SB 610 as part of its evaluation of Hydrology and Water Quality impacts.	Please refer to Section 4.8, *Hydrology and Water Quality*, and Section 4.15, *Utilities and Service Systems*, for a discussion on the Water Supply Assessment prepared for the Project.
	Development within or adjacent to Valley Water right of way will require an encroachment permit, pursuant to the Water Resources Protection Ordinance.	Utility impacts are discussed in Section 4.15, *Utilities and Service Systems*.
Organization Comments		
Mountain View YIMBY	Evaluate an alternative that applies R3-D2 density standards to all R3 Change Areas (replacing all R3-D1 with R3-D2) to maximize future flexibility and avoid the need for later amendments. Also study applying R3-A zoning to all R2 properties and rezoning any nonconforming R1 or R2 properties to a conforming district to enhance clarity and transparency.	Alternatives to the Project that are under consideration are discussed in Chapter 6, *Alternatives*.
League of Women Voters of Los Altos-Mountain View Area	Suggests that the EIR evaluate all proposed change areas based on the potential R3-D2 designation in an alternative to avoid a potential supplemental EIR.	Alternatives to the Project that are under consideration are discussed in Section 6, *Alternatives*. Methodology for R3 Zoning District Update sites is discussed in Chapter 2, *Project Description*.
Livable Mountain View	Include the effects of the State Density Bonus Law in the impact analysis, noting that Mountain View's 15% affordable housing mandate effectively triggers a 50% bonus, with potential for a 100% bonus with slightly higher affordability; base density alone should not be analyzed.	Impacts to population and housing and compliance with the State Density Bonus Law are discussed in Section 4.12, *Population and Housing*.
	Delay Draft EIR preparation until after the September 12, 2025 California Assembly vote on SB 79, which could permit taller by-right buildings near transit, significantly changing allowable zoning.	Comment is not pertinent to the analysis or conclusions of the EIR, which analyzes the Project as proposed, but is noted.
	Fully analyze impacts on infrastructure—especially water demand—and on climate change and GHG emissions.	Impacts to utility infrastructure and water demand are discussed in Section 4.15, *Utilities and Service Systems*. Impacts to climate change and greenhouse gas emissions are discussed in Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*.
	Consider cumulative effects from other approved and pending projects, including the Moffett Precise Plan and frequent "gatekeeper" project approvals.	Please refer to Chapter 3, *Environmental Setting*, for a discussion on cumulative development and impacts that are analyzed throughout this EIR.
	Provide concrete, positive mitigation recommendations in the Draft EIR to address R3 upzoning effects, rather than producing a document that only meets minimum legal requirements.	Please refer to Section 4.2, *Air Quality*, Section 4.3, *Biological Resources*, Section 4.4, *Cultural Resources*, Section 4.6, *Greenhouse Gas Emissions*, Section 4.7, *Hazards and Hazardous Materials*, and Section 4.14, Tribal Cultural Resources for discussions of mitigation measures.

Commenter	Comment/Request	How and Where It Was Addressed
Public Comments		
Aesthetics	High-density, multistory buildings would introduce structures with greater mass and height that are out of scale with surrounding single-story or two-story homes, altering the visual character and architectural cohesion of existing neighborhoods. These changes may degrade scenic vistas, obstruct public and private views, and reduce privacy through elevated sightlines into private yards and homes. Increased nighttime lighting from parking areas, walkways, balconies, and security systems could cause light and glare impacts incompatible with the subdued illumination typical of single-family areas. CEQA requires assessment of whether such changes substantially degrade visual character or adversely affect public views, privacy, and nighttime conditions.	Impacts related to visual character, public views, light and glare, and landscaping are addressed in Section 4.1, *Aesthetics*.
	Taller structures could cast prolonged shadows on adjacent properties, reducing access to sunlight for gardens, trees, and other vegetation. This shading effect may hinder urban agriculture, stress sun-dependent plants, alter microclimates, and reduce biodiversity, with potential indirect effects on sustainability efforts and ecological health. CEQA requires consideration of such shading impacts as part of cumulative and indirect environmental effects.	
	Tall buildings—particularly in winter when the sun is low—can cast prolonged shadows on nearby properties, negatively affecting landscaping, solar power generation, and residents' access to sunlight. These shading impacts may also contribute to decreased property values and reduced livability for affected homeowners.	
Air Quality	Highway vegetation barriers and urban forests should be preserved and enhanced to reduce noise, filter airborne pollutants such as soot particulates and volatile organic compounds, and improve overall air quality. These natural features provide measurable public health benefits by reducing exposure to vehicle emissions.	Impacts related to volatile organic compounds are discussed in Section 4.2, *Air Quality*. Impacts related to reduced noise are discussed in Section 4.10, *Noise*.
Biological Resources and Agriculture	Urban forests, native plants, and wildlife habitats—including pollinator habitats for bees, butterflies, bats, and hummingbirds—should be protected and restored. Private land resources, such as mature tree stands and native plant ecosystems, must be considered in environmental review, and urban forests greater than one acre should be inventoried to support preservation efforts.	Biological impacts are discussed in Section 4.3, *Biological Resources*.
	The proposed density increase could result in the loss of thousands of mature heritage trees and significant portions of the city's green canopy, which are not currently protected under development requirements. This loss would diminish biodiversity, urban habitat, and ecosystem services.	

Commenter	Comment/Request	How and Where It Was Addressed
Noise	Highway vegetation barriers and urban forests can serve as effective noise buffers for nearby residential areas and schools, reducing the impacts of roadway and highway noise.	Construction and operational noise impacts are discussed in Section 4.10, *Noise*.
	The proposed rezoning would increase residential density, leading to more vehicle traffic, HVAC units, trash collection, and daily activity, which would substantially elevate ambient noise levels in adjacent low-density neighborhoods. Construction activity would generate additional noise and dust, potentially degrading local air quality and affecting sensitive receptors such as children and individuals with health vulnerabilities. CEQA requires evaluation of these potential noise and air pollutant exposures before adoption of new zoning standards.	
Land Use and Planning	Zoning requirements should integrate urban forestry and natural resource protection, particularly for R3 and commercial properties. Parkland dedication policies should be expanded to include urban forests and highway vegetation barriers, and planning application checklists should be updated to prioritize the identification and evaluation of natural environmental features early in the review process.	Zoning requirements are discussed in Section 4.9, *Land Use and Planning*.
Greenhouse Gas Emissions and Climate Change	Preserving and enhancing carbon-sequestering landscapes such as urban forests supports climate resilience and environmental sustainability. Integrating natural ecosystems with built environments can help reduce climate impacts and support long-term adaptation goals.	Impacts to ecosystems and the climate are discussed in Section 4.3, *Biological Resources*, and Section 4.6, *Greenhouse Gas Emissions*.
	Loss of mature trees and green space would exacerbate the urban heat island effect, contribute to climate extremes, and reduce natural carbon sequestration. These changes could lead to negative respiratory and mental health impacts for residents.	
Public Services and Utilities	The added population from higher density development may strain existing infrastructure, including water, sewer, stormwater, electrical systems, parks, schools, and emergency services. Without corresponding capacity improvements, service quality could decline and infrastructure deterioration could accelerate. CEQA requires analysis of whether existing utility systems and public services can accommodate the proposed growth.	Impacts to infrastructure and public services are discussed in Section 4.12, *Public Services and Recreation,* and 4.15, *Utilities and Service Systems*.
Transportation	Increased density would generate more vehicle trips, leading to congestion and overflow parking in surrounding residential streets not designed for high traffic volumes. Reduced or eliminated on-site parking under State Density Bonus provisions could exacerbate parking shortages, block driveways, and affect pedestrian and traffic safety. CEQA requires analysis of transportation and parking impacts, including safety considerations and neighborhood character changes due to increased vehicle presence.	Portions of scoping comments addressed parking, which is not an impact under CEQA. Transportation impacts relevant to CEQA are discussed in Section 4.13, *Transportation*.

Commenter	Comment/Request	How and Where It Was Addressed
	A realistic parking study is needed to assess how many additional vehicles would require parking under the proposed rezoning, especially given reduced parking requirements under state law and already congested streets in many R3 districts. The city must evaluate where overflow parking would occur and how it would affect neighborhood circulation and safety.	
Cumulative Impacts	When considered together with past, present, and foreseeable future projects, the proposed rezoning may contribute to significant cumulative impacts on noise, air quality, aesthetics, traffic, and infrastructure. CEQA requires evaluation of the combined effects of multiple projects, not just the incremental impact of a single change.	Please refer to Chapter 3, *Environmental Setting*, for a discussion on cumulative development and impacts that are analyzed throughout this EIR.
	Densification without preserving open space or green resources could result in long-term declines in quality of life, similar to patterns seen in other cities where urban canopy loss and high-rise construction have irreversibly altered the environment.	

1.7 EIR Content

This EIR has been organized into seven sections. These include:

1. **Introduction.** Provides the Project background, and information about the purpose and legal authority of an EIR, and EIR content and scope.
2. **Project Description.** Identifies the Project lead agency, presents, and discusses the Project objectives, Project location, and specific Project characteristics.
3. **Environmental Setting.** Provides a description of the existing physical setting of the Project area and an overview of the progress in implementing the Proposed Project.
4. **Analysis of Environmental Issues.** Describes existing conditions found in the Project area and assesses potential environmental impacts that may be generated by implementing the Proposed Project and cumulative development. These potential Project impacts are compared to "thresholds of significance" in order to determine the nature and severity of the direct and indirect impacts. Mitigation measures, intended to reduce adverse, significant impacts below threshold levels, are proposed where feasible. Impacts that cannot be eliminated or mitigated to less-than-significant levels are also identified.
5. **Other CEQA-Required Discussions.** Identifies the spatial, economic, or population growth impacts that may result from implementation of the Proposed Project, as well as long-term effects of the Project and significant, irreversible environmental changes.
6. **Alternatives.** Presents and assesses the potential environmental impacts of the alternatives (one being a No-Project alternative) analyzed in addition to implementation of the Proposed Project.
7. **References/Preparers.** Lists published materials, federal, State, and local agencies, and other organizations and individuals consulted during the preparation of this EIR. It also lists the EIR preparers.

1.8 Scope of this EIR

As discussed in Section 1.6, a NOP was prepared and circulated, and responses received on the NOP were considered when setting the scope and content of the environmental information in the Program EIR (Appendix A). Environmental topics addressed in detail in Sections 4.1 through 4.15 include the environmental topics outlined in the bullet points below.

1. Aesthetics
2. Air Quality
3. Biological Resources
4. Cultural Resources
5. Geology and Soils
6. Greenhouse Gas Emissions
7. Hazards and Hazardous Materials
8. Hydrology and Water Quality
9. Land Use Planning
10. Noise
11. Public Services and Recreation
12. Transportation
13. Tribal Cultural Resources
14. Utilities and Service Systems

Section 4.16, *Effects Found Not to be Significant,* addresses the following environmental topic areas*:*

1. Agricultural and Forestry Resources
2. Energy
3. Mineral Resources
4. Wildfire

Section 5, *Other CEQA Required Discussions*, covers topics including growth-inducing effects, irreversible environmental effects, and significant and unavoidable impacts. The alternatives section of the EIR (Section 6) was prepared in accordance with *CEQA Guidelines* Section 15126.6 and focuses on alternatives capable of eliminating or reducing significant adverse effects associated with the Project while feasibly attaining most of the basic Project objectives. The alternatives section identifies the "environmentally superior" alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required "No Project" alternative and three alternative development scenarios.

In preparing the Program EIR, use was made of pertinent City policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list can be found in Section 7, *Reference and Preparers*.

1.9 Lead, Responsible, and Trustee Agencies

The State *CEQA Guidelines* define lead, responsible and trustee agencies. The City of Mountain View is the lead agency for the Project because it holds principal responsibility for approving the Project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the Project. There are no responsible agencies for this Project.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. There are no trustee agencies for the proposed project.

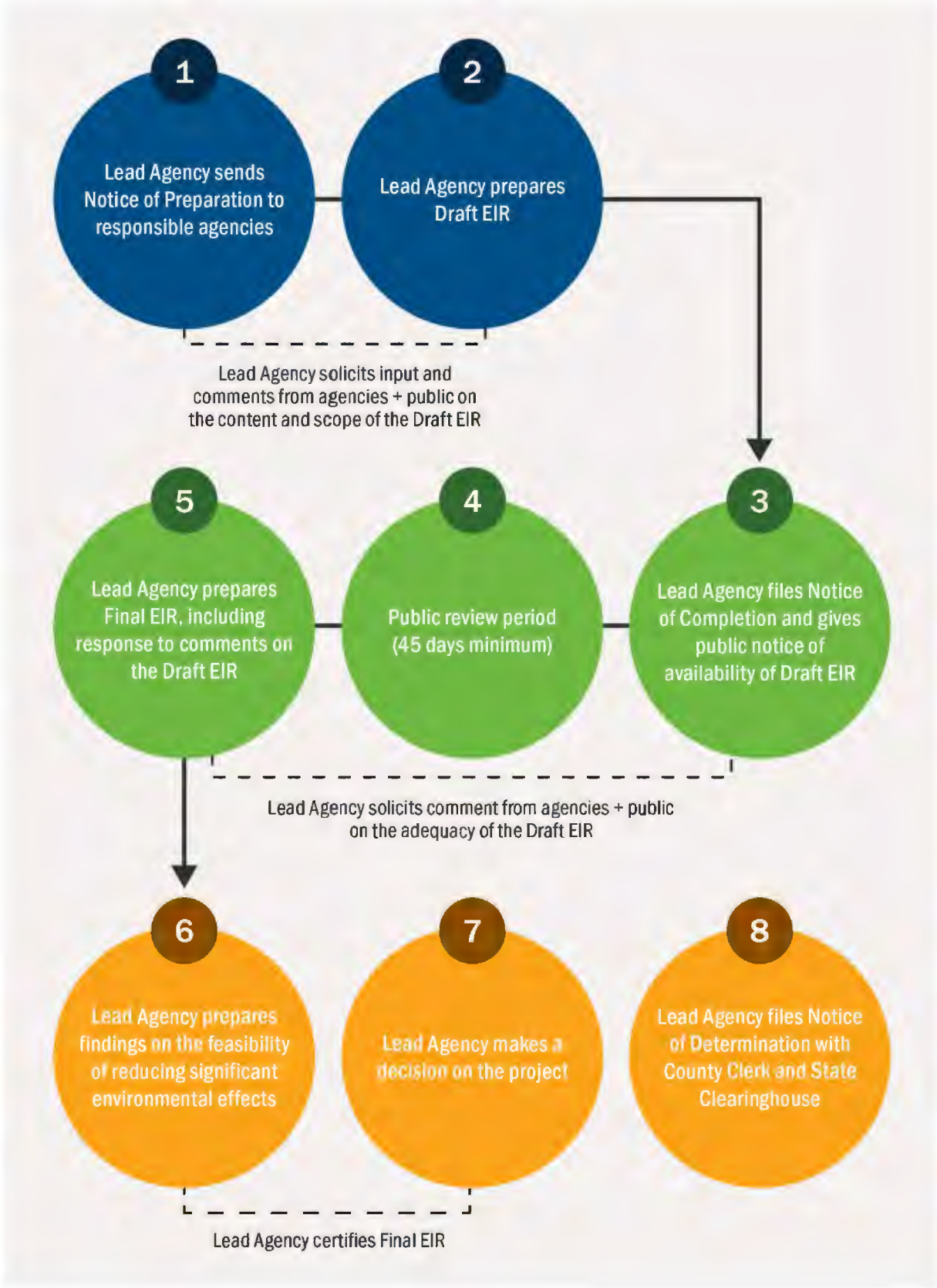
1.10 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

1. **Notice of Preparation Distributed.** After deciding that an EIR is required, the lead agency (City of Mountain View) must file an NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*State CEQA Guidelines* Section 15082, Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days.
2. **Draft EIR Prepared.** The Draft EIR must contain a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion.** The lead agency must file a Notice of Completion (NOC) with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the NOC in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the NOC to anyone requesting it (*State CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation, b) posting on and off the project site, and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (Public Resources Code Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (Public Resources Code 21091).
4. **Final EIR.** A Final EIR must include a) the Draft EIR, b) copies of comments received during public review, c) list of persons and entities commenting, and d) responses to comments.
5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project (*State CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*State CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*State CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.

8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination.** The lead agency must file a Notice of Determination (NOD) after deciding to approve a project for which an EIR is prepared (*State CEQA Guidelines* Section 15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

Figure 1-1 Environmental Review Process



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2 Project Description

The City of Mountain View's (hereinafter referred to as "City" or "Mountain View") proposed R3 Zoning District Update Project (herein referred to as the "Project" or "Proposed Project") consists of amendments to the City's General Plan, Zoning Code (Chapter 36 of the City Code), Zoning Map and various Precise Plans. In addition to expanding residential development opportunities and promoting the City's design priorities, these amendments comply with state law and a portion of the Project implements programs of the City's 2023-2031 Housing Element ("Housing Element") which was adopted on April 11, 2023 by the Mountain View City Council.

The main components of the Proposed Project involve the creation of several subdistricts under the R3 zoning designation and amendments to additional existing zoning districts to support multi-family housing development. The Project involves establishing a proposed new R3 Zoning District and subdistricts, changes to align the R2 Zoning District with the Housing Element, changes to align other residential zoning districts with State law, General Plan Amendments to align with envisioned densities, and other minor changes to the Zoning Map and Chapter 36 (Zoning) of the City Code. Other than Citywide changes, the R3 Zoning District Update amendments would apply to 8,350 parcels over 1,260 acres.

This section describes the Proposed Project, including the lead agency, the locations of proposed changes, major characteristics of the Proposed Project, Project objectives, and discretionary actions needed for approval.

2.1 Lead Agency/ Project Proponent and Contact

City of Mountain View
Community Development Department, Planning Division
500 Castro Street, PO Box 7540
Mountain View, California 94039-7540
Contact: Eric Anderson, Planning Manager, (650) 903-6306, Eric.Anderson2@mountainview.gov

2.2 Project Location

Because the proposed changes are distributed throughout the city, the Project area considered in this Environmental Impact Report (EIR) encompasses the entire City of Mountain View, which is approximately 12.2 square miles in extent. The precise locations of the proposed changes within the city are defined further below and in Figure 2-6. The City of Mountain View is located in northern Santa Clara County in the western portion of the Santa Clara Valley, at the southern end of the San Franisco Peninsula. Mountain View is bordered by the City of Palo Alto to the northwest, the City of Los Altos to the southwest, the City of Sunnyvale to the east, and the San Francisco Bay to the north. The regional location of Mountain View is shown in Figure 2-1 and the Project location is shown in Figure 2-2.

Figure 2-1 City of Mountain View Regional Location

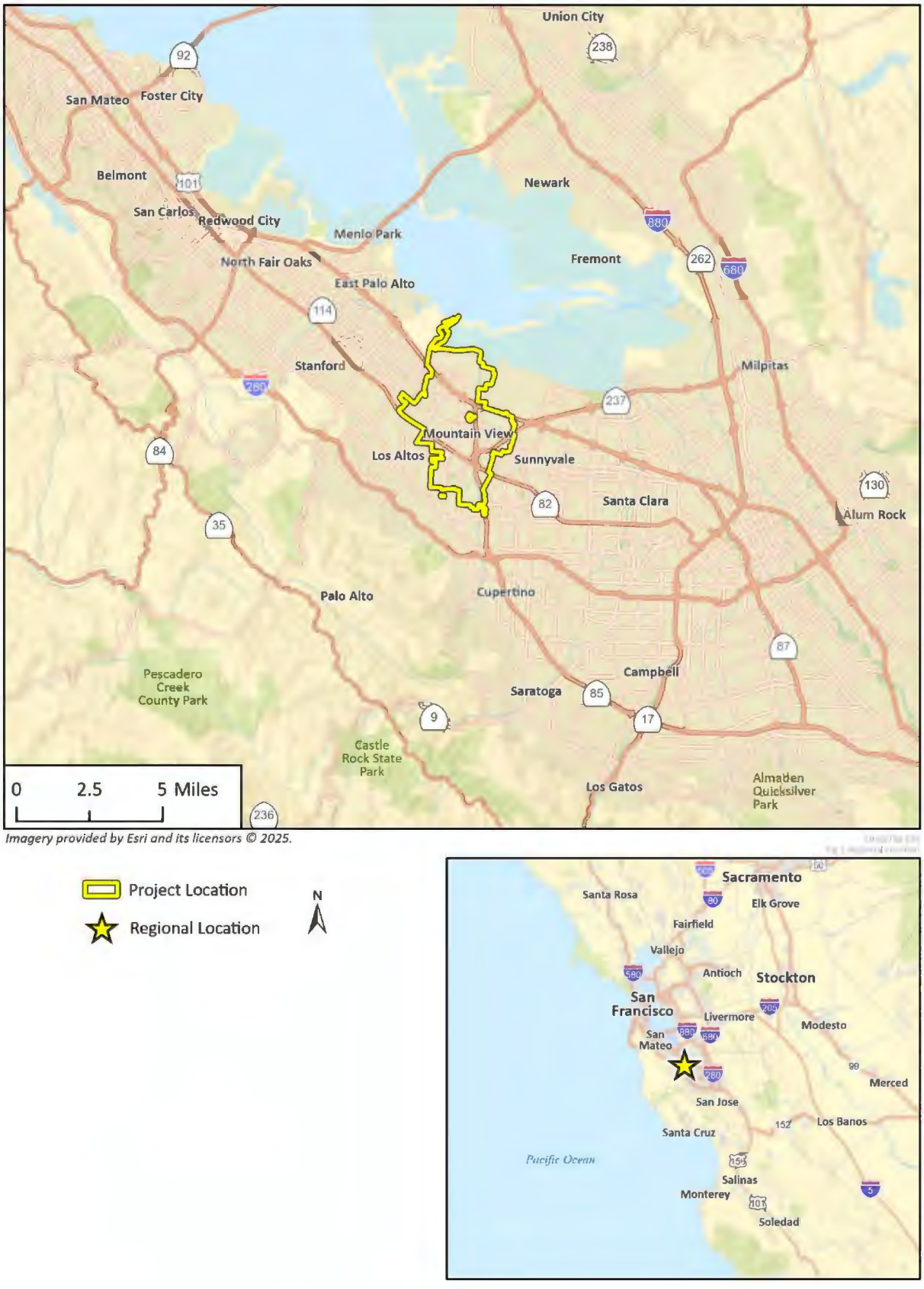
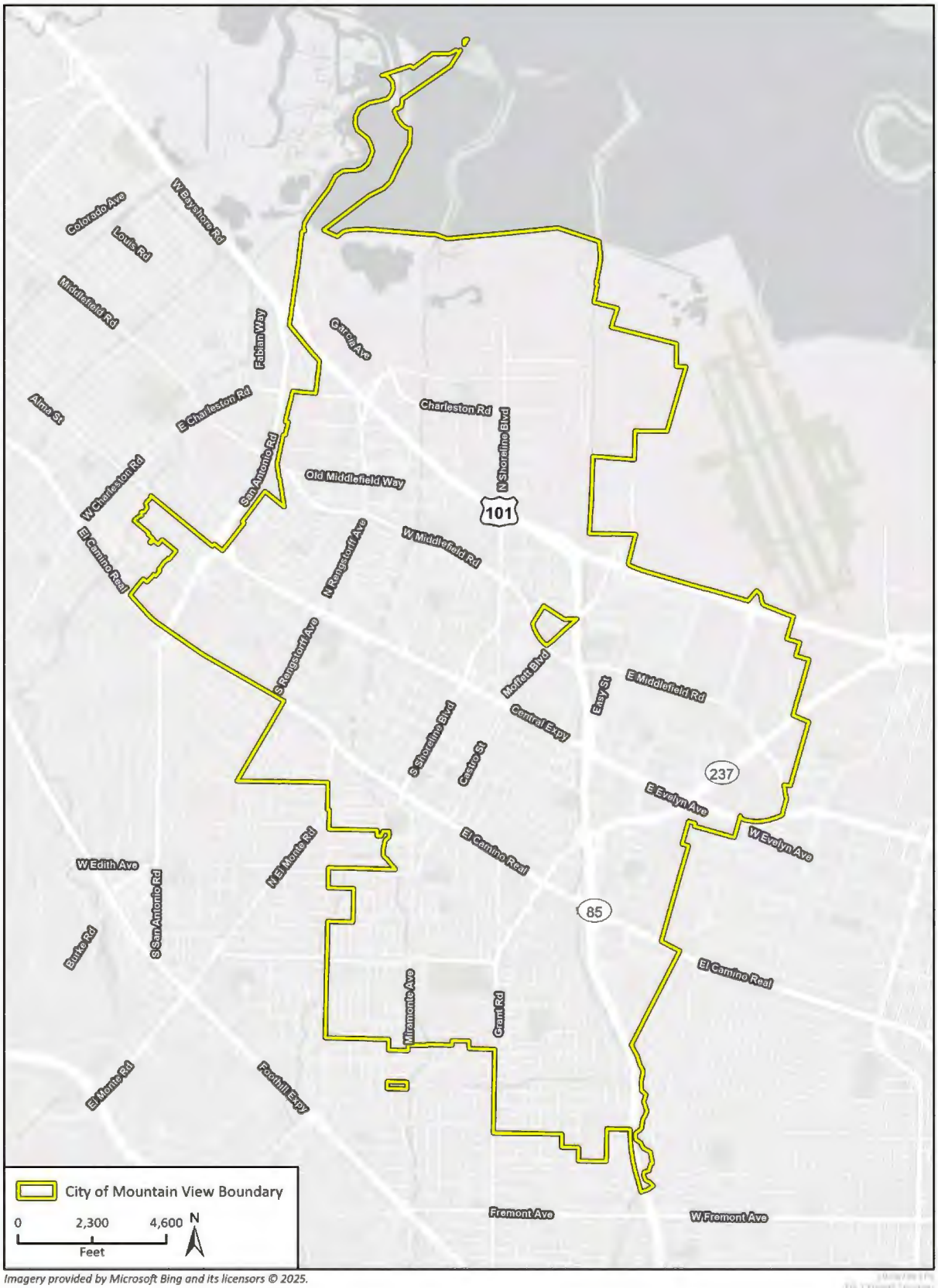


Figure 2-2 Project Location



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City of Mountain View Setting

Mountain View includes primarily residential uses (approximately 42 percent of Mountain View) with the remainder occupied by industrial, commercial, civic, institutional, and open space uses (City of Mountain View 2012). Mountain View contains nearly 1,000 acres of parks and open space made up of 17 mini parks, 18 City- and School District-owned parks, 2 community parks, and one regional park, Shoreline, which comprises 80 percent of the City's park and open space acreage (City of Mountain View 2012). Topography in the city is mostly flat to gently sloping, with Baylands and wetlands in the north, urban and suburban development in the central areas, and foothills in the south and southwest toward the Los Altos Hills area (United States Geological Survey 2021). Land in Mountain View is almost entirely developed, with only 2 percent of land being vacant or used for agriculture (City of Mountain View 2012).

According to the City's 6th Cycle Housing Element Update, adopted in 2023, the housing stock of Mountain View in 2020 was made up of approximately 2.9 percent mobile homes, 29.1 percent single-family detached residences, 12.6 percent single-family attached residences, 8.4 percent multi-family residences in structures with 2-4 units, and 47 percent multi-family residences in structures with 5 or more units (City of Mountain View 2023).

Major areas of non-residential uses include the North Bayshore area, which is a major center for technological employment, defined by its open space resources, high-technology office campuses and office parks; the East Whisman area, another area of technological employment along the VTA light rail line; El Camino Real, a major commercial corridor; San Antonio, a regional shopping area focused around several "big box", grocery and other commercial uses; and Downtown, the City's civic center and "main street". Since adoption of the 2030 General Plan, the City has adopted new plans in several of these areas (including North Bayshore, East Whisman, El Camino Real and San Antonio) to allow new residential development, improve multimodal transportation opportunities, and envision other major changes.

2.3 Project Background

The R3 Zoning District (and the Precise Plans that refer to it) covers approximately 15 percent of the City's area and contains approximately 50 percent of the City's existing dwelling units. It is characterized by a broad diversity of housing types, including single-family, apartments, condominiums, rowhouses, townhouses, and duplexes. It also includes a small number of other uses, such as churches. Most of the City's rent-stabilized units are located in the R3 Zoning District.

The R3 Zoning District Update was identified in the Mountain View City Council's Fiscal Year 2019-21 Goals to "review and propose revisions to the R3 Zone standards that consider form-based zoning, incentivizing stacked flats, and updated rowhouse guidelines." In addition, this update is an opportunity for the City of Mountain View to implement its Housing Element to be in compliance with state housing legislation, including SB 478 (2021, Wiener), SB 684 (2023, Caballero), SB 1123 (2024, Caballero), and SB 1211 (2024, Skinner), as well as updates to the State Density Bonus Law and Housing Accountability Act.

Other Housing Element programs to be implemented through this Project include:

- Program 1.3, Review and Update Ordinance and Precise Plan Residential Standards, is intended to address potential constraints related to existing development standards. Specifically, Program 1.3 calls for the City to revise multi-family development standards to address development standards affecting feasibility, integrate R2-zoned properties into the R3 Zone and

allow SB 9 development in the remaining R2 Zone[1], study live-work as an allowed use, and align zoning with state law.[2]

- Program 1.5, Nonconforming R1 and R2 Multi-Family Developments, is intended to address existing multi-family housing that exceeds current zoning limits by exploring strategies to allow their maintenance or redevelopment while preserving housing supply.

The Proposed Project would implement portions of Program 1.3 and Program 1.5 of the Housing Element related to multi-family zoning reform and the preservation of nonconforming housing.

The Project also exceeds the City's obligations from the Housing Element by developing a comprehensive R3 Zoning District Update that includes new subdistricts (R3-A through R3-D2) with increased densities and updated form-based standards.

Existing zoning designations in the City of Mountain View are shown in Figure 2-3. The following districts may be affected by the Project:

- The R3 Zoning District and Precise Plans that reference the R3 District[3] would be updated with new development standards and, where prescribed, increased density. Allowance for small neighborhood-serving commercial uses and live-work may also be included.
- The R2 Zoning District would be updated to allow development consistent with SB 9, plus allowances for ADUs. Additionally, some areas within the current R2 Zoning district would be integrated (rezoned) into the R3 Zoning District.
- All residential districts (R1, R2, R3, R4, RMH, CRA, various Precise Plans and Commercial District sites where residential uses are allowed) would be updated to be consistent with State laws as described above.

In addition, the Project would include General Plan Amendments to ensure consistency. Existing General Plan Designations are shown in Figure 2-4. These amendments would include modifications to several residential land use designations and creation of new land use designations consistent with the densities in the Project. The General Plan land use map would also be amended consistent with the densities specified for those properties.

[1] Program 1.3(h) specifically calls for the City to "Conduct a review of R2 zoned properties. For all properties, upzone to either allow density greater than typical R1 properties under SB9, (at least four units per typical parcel, plus ADUs) or integrate the sites into the R3 zone. Sites selected to integrate into the R3 zone should be based on affirmatively furthering fair housing, access to transit, schools and services and other policy goals." (City of Mountain View 2023).

[2] Other actions are included in Program 1.3. The actions listed here are the ones included in the R3 Zoning District Update Project.

[3] The following precise plans reference the R3 Zoning District: P(5) 460 North Shoreline Boulevard, P(6) San Ramon, P(13) California-Ortega, P(14) 2100 California Street, P(17) Villa Mariposa, P(26) Grant-Martens), P(31) Mora-Ortega, P(32) Evandale, P(38) El Camino Real, and P(40) San Antonio.

Figure 2-3 Existing Mountain View Zoning Districts

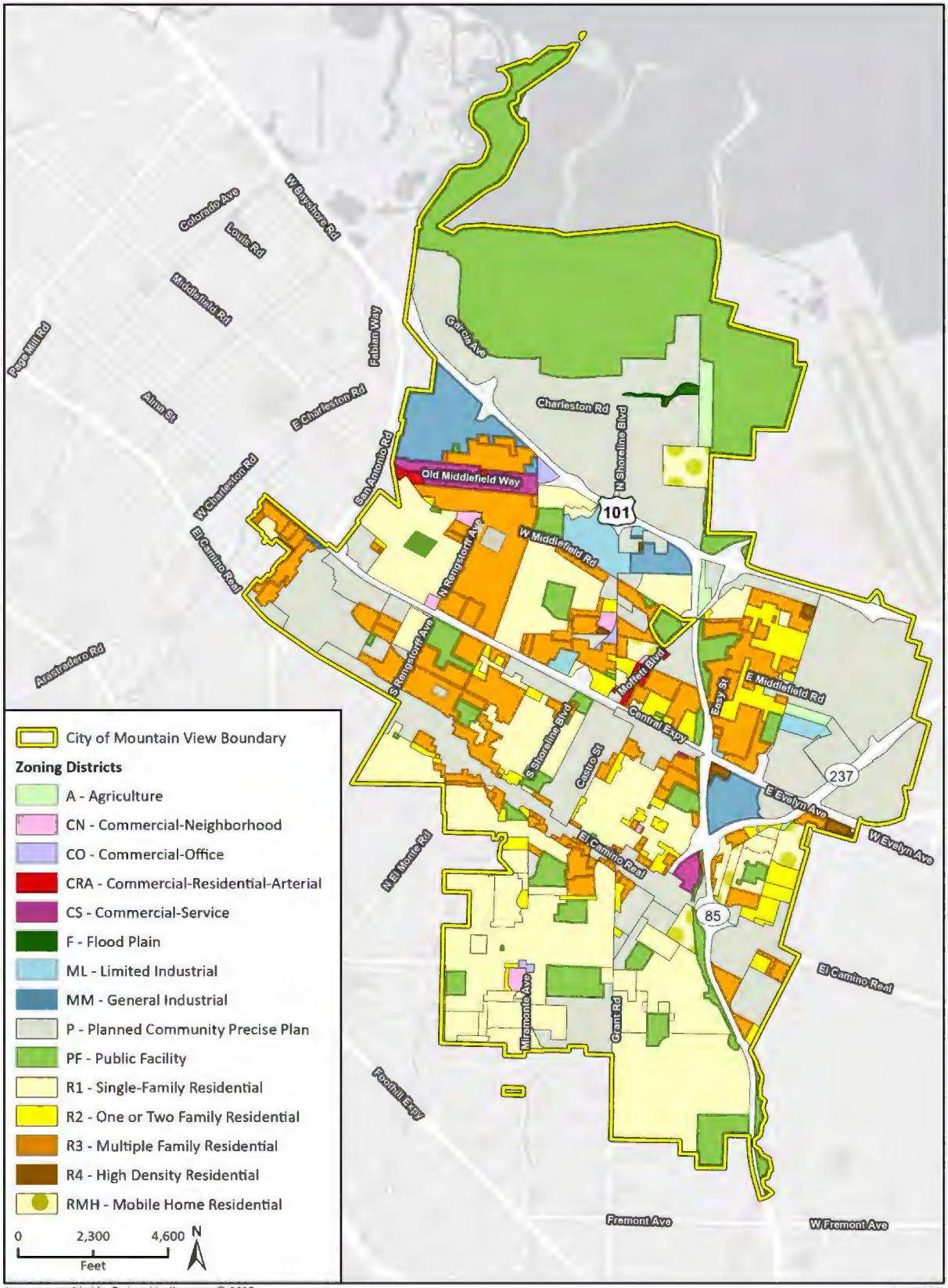
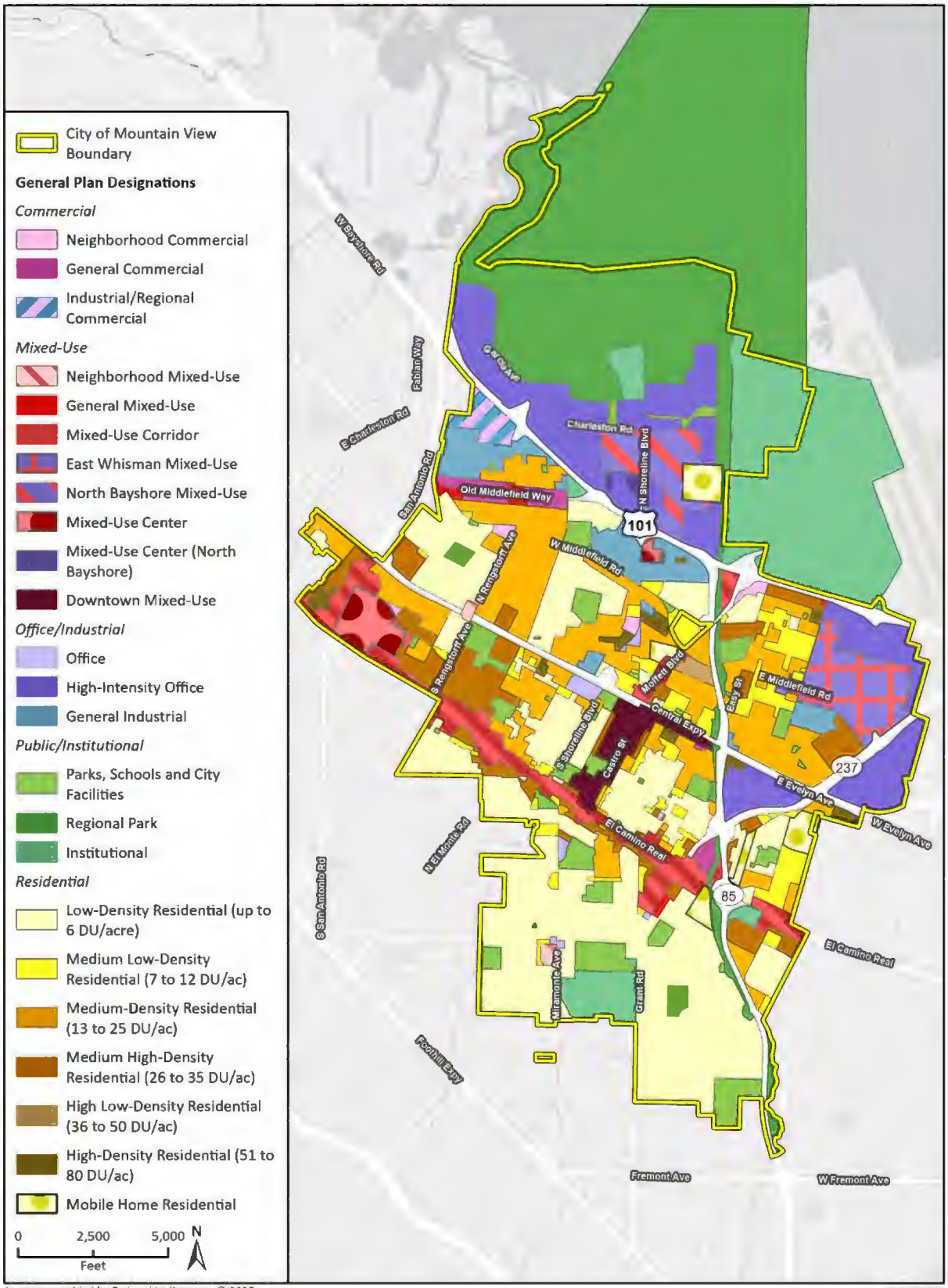


Figure 2-4 Existing General Plan Land Use Designations



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Additional data provided by City of Mountain View, 2025.

2.4 Project Characteristics

The Proposed Project would primarily involve an update to the City of Mountain View's R3 Zoning District to facilitate increased residential densities, improve development standards and feasibility, and align with the City's 2023-2031 Housing Element as well as recent updates to state housing laws. The Project identifies targeted areas for upzoning and includes several new and amended zoning subdistricts which would result in new development standards and/or an increase in allowed density to support the goal of establishing a broader range of housing types and increasing the overall housing supply. The General Plan would also be updated with new and amended land use designations.

The Project includes the following key components:

Establishment of New R3 Zoning Subdistricts and Development Standards

The City proposes changes to the R3 Zoning District, primarily in Division 5 (Multiple-Family (R3) Zoning District Standards) of Article IV (Residential Zones) of Chapter 36 (Zoning) of the City Code. These changes would revise and update development standards (e.g. setbacks, lot size, floor area ratio, parking requirements) throughout the zoning district to improve development feasibility, reflect contemporary building types, create pedestrian-friendly neighborhoods, incorporate respectful transitions, increase tree canopy and landscaping, address State laws, and allow small neighborhood commercial uses and live-work when permitted. In addition to development standards, the R3 Zoning District Update would revise and update objective design standards, including standards for massing, entries and other design features.

A new framework of subdistricts (R3-A, R3-B, R3-C, R3-D1 and R3-D2) would apply, along with new General Plan land use designations that reflect the allowed densities in each subdistrict.

Three subdistricts represent density increases that would increase the City's housing capacity:

The R3-A subdistrict would increase the allowed density in the existing R2 (One- and Two-Family) Zoning District areas where it applies. It would also allow multifamily development without a conditional use permit, which is currently required in the R2 Zoning District. These areas were selected by the City Council based on their location in high-opportunity areas near Downtown and south of El Camino Real, proximity to transit, and non-adjacency to R1-zoned properties.

- The R3-D1 and R3-D2 subdistricts would increase the allowed density in the existing R3 areas where they apply. These areas include fourteen "Change Areas", shown in Figure 2-5 and the discussion above Table 2-1. These sites were selected by the City Council based on parcel size, redevelopment potential, and compatibility with surrounding uses, as well as proximity to transit, commercial and employment centers, and ability to accommodate parks or open space. These areas also include nearby rowhouse and condominium sites, as directed by the City Council.

Two subdistricts would reflect existing allowed densities:

- The R3-B subdistrict is consistent with the existing Medium Density Residential general plan land use designation, which typically applies in the existing R3 zones with suffixes 1.5 and higher.
- The R3-C subdistrict is consistent with the existing Medium-High Density Residential general plan designation, which typically applies in the existing R3 zones with suffixes 1.25 and lower.

The adoption of the R3 Zoning District Update would allow for greater density and include new form-based standards but would not approve specific development on Change Area Sites, which are shown in Figure 2-5. These sites are areas that the City has identified for targeted density increases based on access to transit and employment opportunities, but do not include all R2 and R3 parcels that would be affected by the Project. The proposed R3 zoning subdistricts are further discussed in Table 2-1 and a map of the new subdistricts is shown in Figure 2-6. Potential buildout facilitated by the Project's new densities is discussed in Section 2.4.1, *Project Buildout*.

Table 2-1 Proposed R3 Zoning Subdistricts

Proposed Zoning Subdistrict	Acreage	Existing Density (DU/ac)	Proposed Maximum Density (DU/ac)	Increase in Density (Y/N)
R3-A	61	12 (R2)	15-20[1]	Y
R3-B	564	25	25[2]	N
R3-C	134	35	35[3]	N
R3-D1	138	varies	50-75	Y
R3-D2	138	varies	75-110	Y

[1] R3-A Zoning would be an increase in allowed density relative to the current R2 areas where it would apply.

[2] R3-B Zoning would apply to locations with a previous General Plan designation of Medium Density Residential, which allowed 25 DU/ac.

[3] R3-C Zoning would apply to locations with a previous General Plan designation of Medium High Density Residential, which allowed 35 DU/ac.

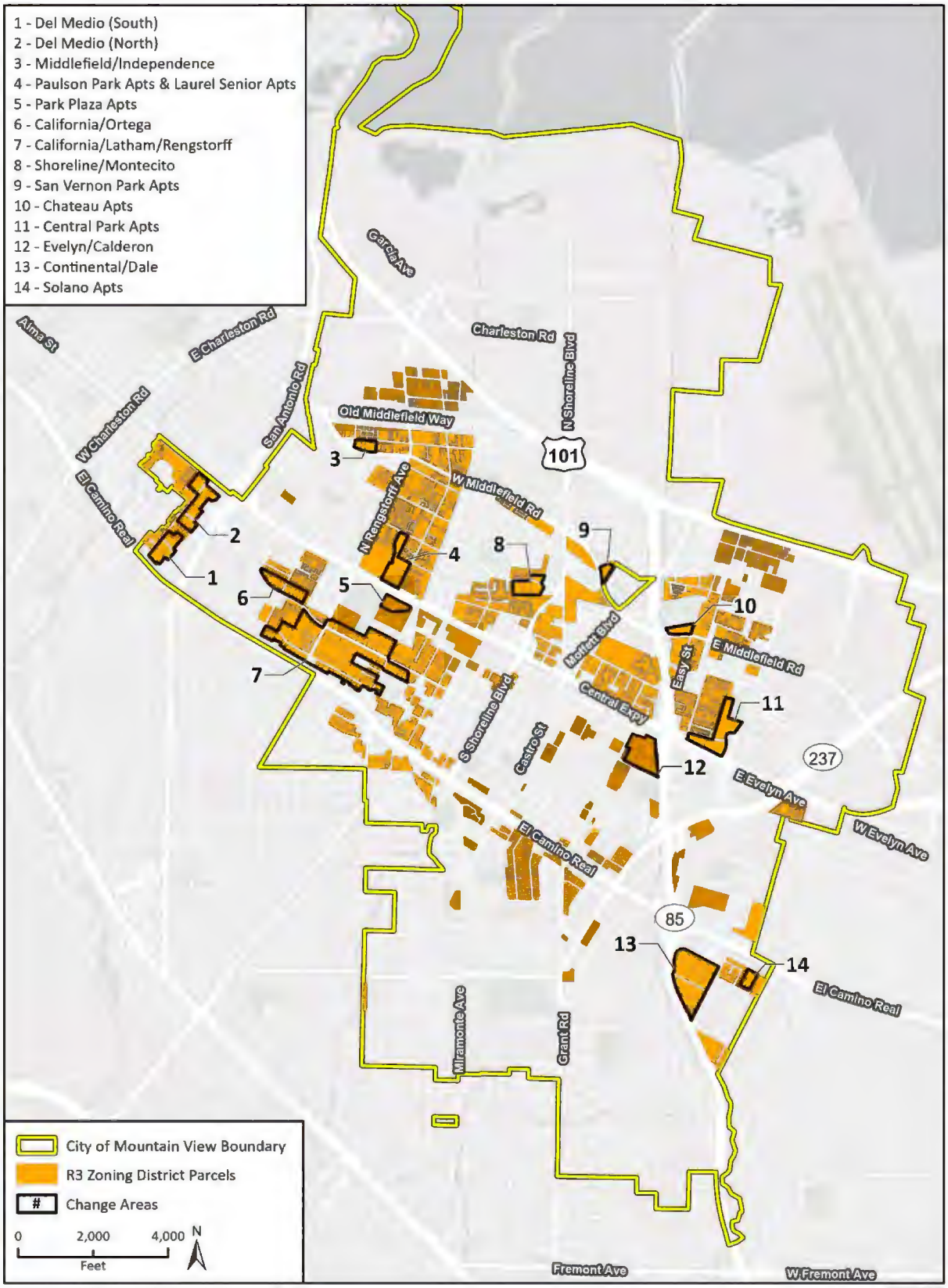
Most of the City's rent-stabilized units are in the R3 Zoning District, and most of the sites in the Change Areas are apartment sites with rent-stabilized units. State law currently requires new development to replace most demolished rent-stabilized units with units that are affordable at the income of the previous tenant.[4] This factor would tend to reduce or eliminate the opportunity for rent-stabilized units to be replaced with a market-rate project of similar or smaller size (usually rowhomes or similar development). Therefore, on most sites in the Change Areas, it can be reasonably expected that redevelopment would result in a greater number of units with at least as many units affordable to previous tenants**.**

Draft Zoning Designation Terminology

This document uses the terms "R3-D1" and "R3-D2" to refer to the zoning and General Plan designations at 50-75 DU/ac and 75-110 DU/ac, respectively, as these were the terms used by the City Council when it authorized the project on June 24, 2025. However, subsequent drafts of the ordinance resulted in several changes to the designation terminology. In the public draft reviewed by the City Council on February 10, 2026, the R3-D zoning designation refers to the General Plan's allowed density. R3-D1 is equivalent to the Residential-65 General Plan designation applied to the R3-D zone, and R3-D2 is equivalent to the Residential-110 General Plan designation applied to the R3-D zone. Further, pursuant to Council direction on February 10, 2026, the final draft of the ordinance will integrate the R3-D and R4 zoning districts (without changing the allowed density in the current R4 district). In the final draft, R3-D1 is equivalent to the Residential-65 General Plan designation applied to the R4 zone, and R3-D2 is equivalent to the Residential-110 General Plan designation applied to the R4 zone.

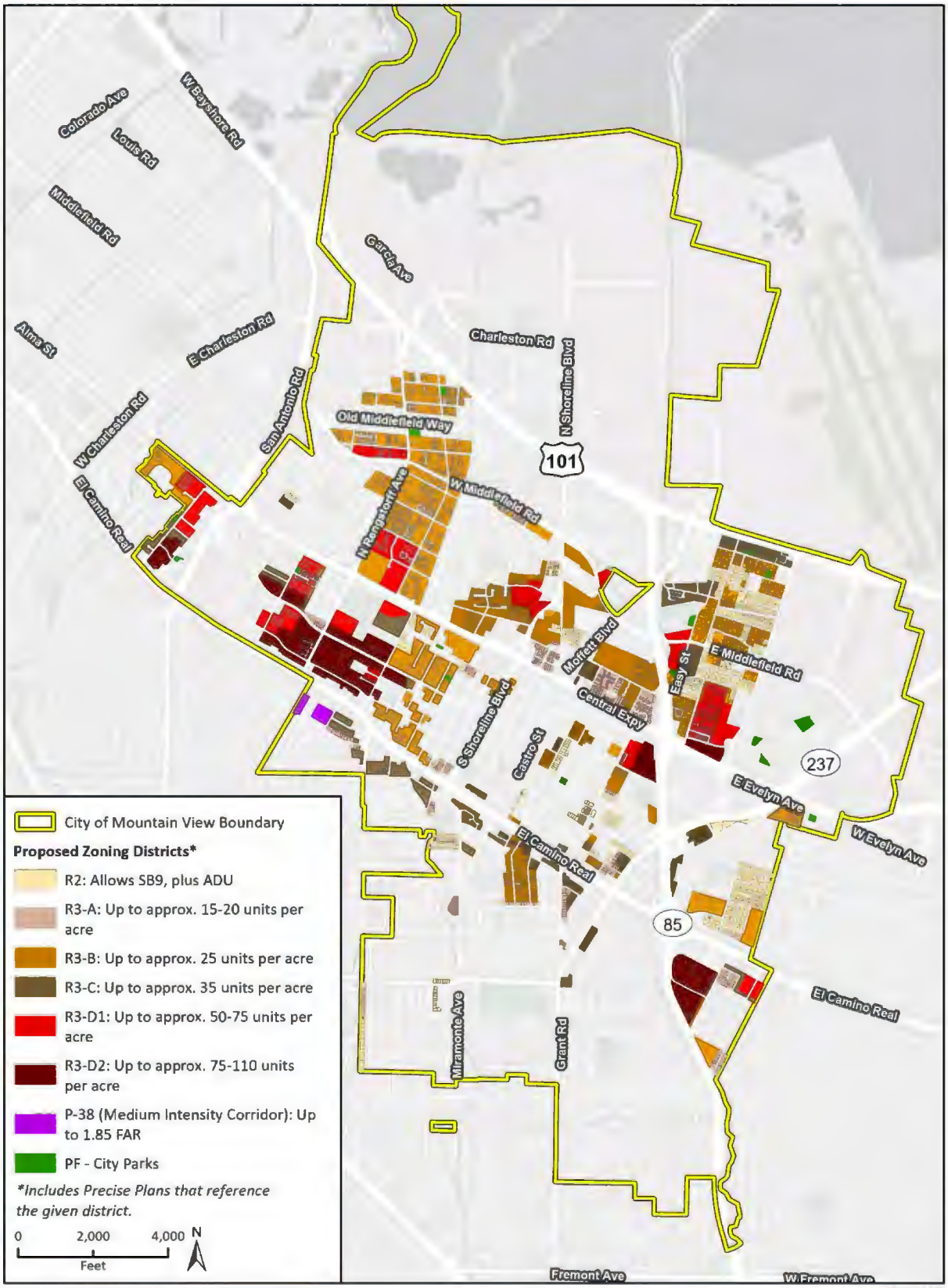
[4] Prior to July 1, 2025, this provision was set to expire in 2030. However, with the passage of AB 130, this provision does not expire.

Figure 2-5 Change Areas



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Figure 2-6 Proposed Zoning Update Parcels



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Zoning Amendments in the R2 Zoning District

The R2 Zoning District currently allows approximately 12 dwelling units per acre (DU/ac). As described above, the zoning update would rezone select R2-zoned parcels to R3-A based on criteria such as proximity to transit and to align with fair housing goals. The remaining R2 Zoning District standards would be amended to allow opportunities for SB 9 and Accessory Dwelling Units (ADUs), pursuant to Housing Element Program 1.3(h). Buildout associated with these amendments would be marginal compared to buildout facilitated by the updates to R3 zoning.

Updates to Nonconforming Standards and Other Zoning and Precise Plan Standards

Program 1.5 of the Housing Element, Nonconforming R1 and R2 Multi-Family Developments, is intended to update nonconforming standards in Division 3 (Nonconforming Uses and Structures) of Article III (General Regulations, Special Provisions, Exceptions and Interpretations) of Chapter 36 (Zoning) of the City Code. These updates would allow broader opportunities to maintain or redevelop existing multi-family housing that exceeds current zoning limits.

In addition, various other sections of the Zoning Ordinance will be updated for consistency with the project (such as minor changes to the R4 zoning designation), to implement state laws, or as other minor code clean-ups.

These updates would not result in a change in existing conditions with potential for environmental impact or are consistent with state law. As such, these Project components are not part of the environmental impact analysis conducted throughout this EIR.

Additional El Camino Real Precise Plan Amendments and Public Facilities Rezoning

The Project includes the amendment of two condominium sites in the El Camino Real Precise Plan (P-38) to a designation of "Medium Intensity Corridor" in the precise plan to be consistent with the General Plan. Additionally, the Project may include the rezoning of several residentially zoned sites that include city parks to a Public Facilities (PF) designation. The El Camino Real Precise Plan Amendments and Park rezoning are meant to align the existing use of select sites with the Zoning designation and the City of Mountain View General Plan. These updates would not result in a change in existing conditions with potential for environmental impact. As such, these Project components are not part of the environmental impact analysis conducted throughout this EIR.

2.5 Project Buildout

Adoption of the Proposed Project would not approve any specific physical development (e.g. construction of housing or infrastructure). However, this EIR assumes that such actions are reasonably foreseeable future outcomes of Project implementation. As such, this EIR evaluates the potential physical environmental impacts of future development that could result from the implementation of the R3 Zoning District Update densities shown in Figure 2-6. Full buildout associated with the R3 Zoning District Update would result in up to 10,000-16,000 additional residential units through the year 2050, consisting of existing development potential for roughly 1,200 existing units plus potential for approximately 8,800-14,800 additional units. Project buildout is summarized in Table 2-2, below. The "2050 Conditions, No Project" and "2050 Future Total With Project" columns are inclusive of projects in Table 3-1 (see Chapter 3).

Table 2-2 Maximum Potential Project Buildout

	Existing Baseline (2025)	2050 Conditions, No Project	2050 Future Total with Project[4]	Project Contribution to 2050 Conditions (Net Change)
Dwelling Units	40,534[1]	70,100	84,900	16,000
Population	86,513[2]	148,200	177,800	32,000
Jobs	83,844[3]	133,000	133,000	Marginal [5]

[1] Source: Department of Finance (DOF) 2025a.

[2] Source: DOF 2025b.

[3] Source: American Community Survey 2023

[4] 2050 conditions and Project contributions were calculated by City staff. Totals may not add because a small amount of growth on Project parcels is assumed in the 2050 Condition No Project scenario.

[5] Small amount of neighborhood commercial would be included. This is expected to add between 100-250 jobs, which is marginal at this scale of project. In addition, new housing may increase employment by an unknown amount through home occupations.

2.6 Project Objectives

The objectives for the Proposed Project include:

1. Create opportunities for diverse unit types, including middle-income ownership and stacked flats;
2. Produce better design that reflects the community's vision through objective form-based standards, including pedestrian-friendly neighborhoods, respectful transitions, and increased tree canopy and landscaping;
3. Create opportunities for neighborhood-serving uses;
4. Update the R3 Zoning District to be consistent with state law and the General Plan while addressing Housing Element programs and improving development review;
5. Use density change in targeted areas to achieve desired goals, implement changes to large-parcel areas rather than small, and increase the supply of housing; and
6. Encourage parcel aggregation.

2.7 Required Approvals

The following list specifies, non-exhaustively and non-exclusively, the approvals from the City of Mountain View that are anticipated to be necessary for the Project. Approval from other public agencies is not required.

Required approvals by the City of Mountain View include:

- Certification of the EIR
- Adoption of the EIR Findings and Statement of Overriding Considerations
- Adoption of a Mitigation, Monitoring, and Reporting Program in conjunction with the EIR
- Adoption of the R3 Zoning District Update, including amendments to the General Plan, Zoning Ordinance, and ten (10) precise plans: P(5) 460 North Shoreline Boulevard, P(6) San Ramon, P(13) California-Ortega, P(14) 2100 California Street, P(17) Villa Mariposa, P(26) Grant-Martens, P(32) Evandale, P(38) El Camino Real, and P(40) San Antonio. An additional two (2) precise plans may be amended to address the public facilities rezoning: P(35) Whisman Station and P(37) South Whisman.

Future projects on the R3 Zoning District Update sites must adhere to the mitigation measures identified in the Mitigation Monitoring and Reporting Program for this EIR. Environmental review for subsequent projects may tier from this EIR (*CEQA Guidelines* Sections 15152, 15162 and 15168). This EIR comprehensively considers a series of related projects with the intent to streamline subsequent review of future development projects. Subsequent actions would be examined in the light of the EIR to determine whether an additional environmental document needs to be prepared. Most projects would require subsequent approvals, which may be either "by right" or discretionary, as determined by the City Council when adopting Development Code amendments to implement the Proposed Project. Potential subsequent approvals may include:

- Development Review (subject to objective standards only, unless exceptions are requested)
- Conditional Use Permit (e.g., shared or reduced parking)
- Minor Exception (e.g., minor parking or setback reductions)
- Heritage Tree Removal Permit
- Subdivision Map (e.g. condominiums, lot line adjustments, etc.)

2.8 California Native American Tribe Consultation

In accordance with AB 52 and SB 18, the City conducted tribal consultation as the lead agency. The City's consultation efforts and subsequent communication with contacted tribes is summarized in Section 4.14, *Tribal Cultural Resources*, of this EIR. AB 52 and SB 18 correspondence is included in Appendix B.

In addition, in accordance with AB 52, the City sent written communication regarding the Project via certified mail on August 20, 2025, to the Tamien Nation. In accordance with SB 18, the City also sent the following nine tribes written communication regarding the Project via certified mail on August 20, 2025:

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

Tribes have 30 days to respond and request consultation under AB 52 and 90 days to respond under SB 18. The AB 52 consultation request period for the above tribes ended on September 19, 2025 and the SB 18 consultation request period ended on November 18, 2025. The City received requests for consultation under AB 52 from Tamien Nation on September 10, 2025, and consultation under SB 18 from Muwekma Ohlone Tribe of the SF Bay Area on October 1, 2025.

3 Environmental Setting

This section provides a general overview of the environmental setting for the Proposed Project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

3.1 Regional Setting

The Proposed Project is located in the city of Mountain View. Mountain View is located approximately 27.3 miles southeast of San Francisco in northern Santa Clara County. Mountain View is surrounded by the city of Palo Alto to the northwest, the city of Los Altos to the southwest, the city of Sunnyvale to the east, and the San Franisco Bay to the north. Mountain View encompasses approximately 12 square miles and is characterized a generally level urbanized area in the center framed by natural features including the San Francisco Bay to the north, the Santa Cruz Mountains to the southwest, and Permanent Creek and Stevens Creek which flow through portions of the city. Several highways pass through Mountain View including US 101, State Route 237, State Route 85, and State Route 85. Figure 2-1 in Section 2, *Project Description*, shows the regional location of the Project.

3.2 Project Area Setting

The affected areas within the City of Mountain View span a variety of urbanized settings. Areas around San Antonio Road and South Rengstorff Avenue are characterized by two- to four-story multifamily residential, with proximity to transit and retail. Areas near South Shoreline Boulevard and El Camino Real are characterized by a mix of single-family, duplex, and one- to three-story multifamily residential, with access to transit and retail in Downtown and/or the El Camino Real corridor. Areas north of Central Expressway are primarily a mix of attached and detached single family homes, duplexes, and one-to two-story multifamily residential. Areas around Moffett Boulevard and North Whisman Road have good access to jobs, retail and transit. Areas around Old Middlefield Way tend to be industrial in nature, but also have good access to jobs. Many areas are near freeways and large arterials, like US-101, SR-85, SR-237, El Camino Real, Central Expressway, Shoreline Boulevard and Rengstorff Avenue. Overall, the environmental settings include quiet suburban areas, and busy mixed-use areas, with most sites well-integrated into existing urban fabric and minimal natural resource impacts.

The location, size, existing zoning, existing density, unit increase potential, and proposed density for the zoning update areas are described in Table 2-1 and Table 2-2 in Section 2, *Project Description*. Figure 2-6 in Section 2, *Project Description*, shows the locations of the zoning update parcels.

3.3 Cumulative Development

In addition to the specific impacts of individual projects, CEQA requires EIRs to consider potential cumulative impacts of the Proposed Project. CEQA defines “cumulative impacts” as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the Proposed Project and other nearby

projects. For example, noise impacts of two nearby projects may be less than significant when analyzed separately, but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

CEQA requires cumulative impact analysis in EIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a summary of projections contained in an adopted planning document such as a general plan.

For this EIR, cumulative impacts for some issue areas such as air quality, greenhouse gas emissions, and transportation rely on larger geographic areas such as the Bay Area region. For issue areas that may have regional cumulative impact implications, the cumulative impact analyses for this EIR are based on Plan Bay Area 2050, the Bay Area's most recent Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Based on the forecasts in Plan Bay Area 2050 (which are by growth geographies and not by city), North and Northwest Santa Clara Counties, which includes the cities of Sunnyvale, Mountain View, Palo Alto, Los Altos, Los Altos Hills, and part of the cities of Santa Clara, Milpitas, and San Jose, is estimated to have 422,000 housing units by 2050 compared to the baseline housing for this area of 181,000 units (a 113 percent increase) (ABAG and MTC 2021).

For analyses that may have more localized or neighborhood implications (e.g., cultural resources, noise, public services, and utilities and service systems), the cumulative impact analysis is based on a list of planned and pending projects. Planned and pending projects[1] as of July 2025 within one half miles of any of the Zoning District Change sites are listed in Table 3-1 (the status column reflects the project status as of April 2026). The total growth of these projects is consistent with the "Future" scenarios in Table 2-2. These projects are considered in the cumulative analyses in Section 4, *Environmental Impact Analysis*.

The analysis included in each cumulative impact section analyzes whether, after implementation of mitigation that minimize environmental effects, the residual impacts of the Proposed Project would cause a cumulatively significant impact or would contribute considerably to existing or anticipated cumulatively significant effects. Where the Proposed Project would so contribute, additional mitigation is recommended where feasible.

[1] This list does not include legislative projects or requests that had not initiated CEQA scoping by July 2025.

Table 3-1 Cumulative Plans and Projects List

Project	Jurisdiction	Location/Planning Area	Project Details	Status
2023-2031 Housing Element Implementation	City of Mountain View	Citywide	Regional Housing Needs Allocation (RHNA) of 11,135 units by 2031, and various programs to accelerate housing production	Approved (Implementation in process)
2023-2031 Housing Element Implementation	Cities of Palo Alto, Los Altos, and Sunnyvale	Citywide for affected jurisdictions	RHNA of 6,086, 1,958 and 11,966 units, respectively	Approved (Implementation in process)
969 Hope Street and 679 Fairmont Avenue	City of Mountain View	El Camino Real	36 residential condominium units	Undergoing review
1500 N. Shoreline Boulevard	City of Mountain View	North Bayshore	1,914 residential units (20% affordable), 100,000 sf fitness center, 20,00 sf of retail/restaurant uses, and 24,600 sf open space, 329 heritage trees removed	Undergoing review
1110 Terra Bella Avenue & 1012 Linda Vista Avenue	City of Mountain View	Moffett/Whisman	7-story, 70-unit affordable housing via State Density Bonus and SB 35	Undergoing review
1919-1933 Gamel Way, 574 Escuela Avenue & 1970 Latham Street (1920 Gamel Way)	City of Mountain View	San Antonio	6-story, 216 condominium unit residential development with underground parking and vacation of Gamel Way to replace 29 rental units	Undergoing review
881 Castro Street	City of Mountain View	Central Neighborhoods/ Downtown Mountain View	8-story, mixed-use building with 140 condominium units and 13,352 sf commercial with two levels of below-grade parking	Undergoing review
1808 North Shoreline Boulevard	City of Mountain View	North Bayshore	Six-story office/R&D/lab building of up to 108,856 square-feet, approximately 4,000 square feet of ground-floor retail space	Undergoing review
333 Franklin Street	City of Mountain View	Central Neighborhoods/Downtown	12-unit apartment complex and two detached ADUs	Undergoing review
177 Ada Avenue	City of Mountain View	Moffett/Whisman	3 small-lot single-family homes	Undergoing review
762 San Antonio Road	City of Palo Alto	N/A	7-story multi-family residential building containing 198 rental apartments	Undergoing review
824 San Antonio Road	City of Palo Alto	N/A	4-Story private residential senior living facility	Undergoing review
4335 & 4345 El Camino Real	City of Palo Alto	N/A	29 new three-story townhome-style condominiums in five buildings across two lots	Undergoing review

Project	Jurisdiction	Location/Planning Area	Project Details	Status
515 – 545 North Whisman Road	City of Mountain View	Moffett/Whisman	195 three-story attached rowhouse condominiums	Approved
828 and 836 Sierra Vista Avenue and 1975 and 1979 Colony Street	City of Mountain View	Monta Loma/Farley/Rock	20-unit rowhouse development	Approved
555 W. Middlefield Road	City of Mountain View	Moffett/Whisman	Addition of 323 apartment units, 3 new underground garages, new amenity building/leasing office, and future 1.34-acre public park to an existing 402-unit residential development	Approved
265-405 San Antonio Road and 2585-2595 California Street (San Antonio Center Phase III)	City of Mountain View	San Antonio	Amendments to the P(40) San Antonio Precise Plan and Master Plan; 7-story, 182,352 sf commercial building, 150,000 sf Transfer of Development Rights (TDR) from LASD TDR Program	Approved
749 West El Camino Real	City of Mountain View	El Camino Real	Mixed-use development with 299 rental units, 22,338 sf retail and parking	Approved
294-296 Tyrella Avenue	City of Mountain View	Moffett/Whisman	7-story, 80-unit residential condominium building (20% units affordable)	Approved
266 and 272 Tyrella Avenue	City of Mountain View	Moffett/Whisman	4-story, 47-unit condominium development to replace one single-family home and two duplexes on a 1.01-acre site.	Approved
675-685 E. Middlefield Road	City of Mountain View	Moffett/Whisman	686 market rate apartments (two 7-story and 8-story multi-family apartment buildings), 8-story, 150-unit affordable housing apartment building, a 6-story, 275,000 sf office building, an 8.5 level parking garage with 638 parking spaces and a 0.52-acre open space to replace two 2-story office buildings and surface parking	Approved
Google Middlefield Park Master Plan	City of Mountain View	Moffett/Whisman	1,900 residential uses (over 15% affordable), 1.317 million sf office space, 7 acres public parkland, 2.8-acre open space, 50,000 sf commercial uses, new private streets, pedestrian, and bike improvements, and optional private district utility system	Approved
Google North Bayshore Master Plan	City of Mountain View	Moffett/Whisman	7,000 residential units (15% affordable), 3.14 million sf office space, 26 acres public parks and privately-owned, publicly-accessible open spaces, 233,990 sf retail, 55,000 sf community facilities, new public and private streets, pedestrian and bike improvements, and optional private district utility system	Approved

Project	Jurisdiction	Location/Planning Area	Project Details	Status
400 Logue Avenue	City of Mountain View	Moffett/Whisman	8-story, 408-unit residential development	Approved
870 East El Camino Real	City of Mountain View	El Camino Real	Two 6-story buildings with 233 apartment units and one level of underground parking at an existing residential site, for a total of 371 apartment units	Approved
901, 913, and 987 North Rengstorff Avenue	City of Mountain View	Monta Loma/Farley Rock	15-story, 455-unit apartment complex with 20% affordable units above a parking garage	Approved
400 Moffett Boulevard	City of Mountain View	Moffett/Whisman	6-story, 175-unit apartment, approximately 2,373 sf commercial/retail, and 7,000 sf residential-serving amenities with 193 parking spaces	Approved
334 San Antonio Road	City of Mountain View	San Antonio	8-story, 99-unit fully affordable rental housing	Approved
2645-2655 Fayette Drive	City of Mountain View	San Antonio	7-story, 20% affordable 70-unit condominium	Approved
500 and 550 Ellis Street	City of Mountain View	Moffett/Whisman	6-story hotel with 201 rooms and 37,611 sf office building, replacing two commercial office buildings	Approved
601 Escuela Avenue and 1873 Latham Street	City of Mountain View	El Camino Real	General Plan Map Amendment from Medium-Density Residential to Mixed-Use Corridor; Zoning Map Amendment from the R3-2.5 (Multiple-Family) district to the P(38) El Camino Real Precise Plan; 3-story, 25-unit apartments with 2,700 sf commercial uses	Approved
1057, 1059, 1061 El Monte Avenue	City of Mountain View	Miramonte/Springer	4-story, 90-room senior care facility	Approved
City Lot 12	City of Mountain View	Central Neighborhoods/ Downtown Mountain View	5-story, mixed-use development with 120 affordable rental housing units and 2,300 sf commercial, replacing a City parking lot with 160 spaces	Approved
1020 Terra Bella Avenue	City of Mountain View	Moffett/Whisman	General Plan Map Amendment from General Industrial to High Density Residential, Zoning Map Amendment from General Industrial to Planned Community; 6-story, 108-unit affordable rental housing above a 2-story underground parking garage	Approved
189 North Bernardo Avenue	City of Mountain View	Moffett/Whisman	four-story, 80,000 square foot office building, a new parking structure with four levels of above-grade parking and two levels of underground parking, and minor building modifications to the existing two-story, 59,000 square foot office building to remain on site	Approved

Project	Jurisdiction	Location/Planning Area	Project Details	Status
96 W El Camino Real	City of Mountain View	El Camino Real	6-story, 79-unit affordable rental apartments with one-story below-grade parking	Approved
918 Rich Avenue	City of Mountain View	Miramonte/ Springer	Five-story, 32-unit condominium development	Approved
701 West Evelyn Avenue	City of Mountain View	Central Neighborhoods/Downtown	Four-story commercial building containing 6,500 square feet of ground-floor retail and 28,090 square feet of office	Approved
590 Castro Street	City of Mountain View	Central Neighborhoods/Downtown	Four-story, 105,255 square foot office building	Approved
705 W Dana Street	City of Mountain View	Central Neighborhoods/Downtown	Three- story, 18,800 square foot commercial building with ground-floor restaurant and upper floor office	Approved
301 Moorpark Way	City of Mountain View	Grant/Sylvan Park	22 Single-Family Units	Approved
1124 W El Camino Real	City of Sunnyvale	N/A	1) a seven-story mixed-use building including approximately 31,361 square feet of commercial/retail space on the first and second stories and 111 rental residential units on the third story and above; and, 2) five two-story single family homes.	Approved
1035 W El Camino Real	City of Sunnyvale	N/A	1) a convalescent hospital building (three-story, 72,000 sq. ft., and 52-bed capacity); and, 2) a mixed-use, multifamily residential "senior living" building (six-story, with ground floor commercial [12,232 sq. ft. commercial floor area], 113 independent living units, and 36 assisted living accommodations).	Approved
4898 El Camino Real	City of Los Altos	N/A	Eight-story, 85-unit condominium building	Approved
851 - 853 Sierra Vista Avenue	City of Mountain View	Moffett/Whisman	General Plan Map Amendment from General Industrial to Medium-Density Residential; a Zoning Map Amendment from R3-2sd (Multiple-Family Residential Special Design) and General Industrial to R3 (Multiple-Family Residential); 9 new rowhouses to replace 3 single-family homes	Under construction
1001 North Shoreline Boulevard	City of Mountain View	Moffett/Whisman	General Plan Map Amendment from General Industrial to Mixed Use Center and related General Plan text amendments, Zoning Map Amendment from Limited Industrial and General Industrial to Planned Community; 7-story, 203-unit apartments with 2 levels of parking, a 7-story, 100-unit building with 2 levels of parking, and a 6-level parking garage to accommodate existing 111,443 sf office building	Under construction

Project	Jurisdiction	Location/Planning Area	Project Details	Status
777 West Middlefield Road	City of Mountain View	Moffett/Whisman	General Plan Amendment from Medium-Density Residential; a Zoning Map Amendment from R3-w to Planned Community; 716 new apartment units with 144 affordable, replacing 208 existing apartment units	Under construction
1555 West Middlefield Road	City of Mountain View	Monta Loma/Farley/Rock	115-unit rowhouse development replacing an existing 116-unit apartment	Under construction
1100 La Avenida Street	City of Mountain View	North Bayshore	4-story apartment building with 100 affordable units	Under construction
570 South Rengstorff Avenue	City of Mountain View	San Antonio	85 rowhouses replacing 70 existing apartment units	Under construction
1265 Montecito Avenue	City of Mountain View	Monta Loma/Farley/Rock	General Plan Map Amendment from Neighborhood Commercial from High Density Residential, Zoning Map Amendment from Neighborhood Commercial to R4 High Density Residential, 5-story building with 84 affordable rental units	Under construction
600 Ellis Street	City of Mountain View	Moffett/Whisman	Six-story, 259,595 square foot office building	Under construction
1255 Pear Avenue	City of Mountain View	North Bayshore	244 apartments	Under construction
330 Distel Circle	City of Los Altos	N/A	90 affordable apartments	Under construction
5150 El Camino Real	City of Los Altos	N/A	172 apartments	Under construction
4846 and 4856 El Camino Real	City of Los Altos	N/A	52 condominiums	Under construction

Source: City of Mountain View 2025a, City of Mountain View 2025b

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4 Environmental Impact Analysis

This section discusses the potential environmental effects of the Mountain View R3 Zoning District Update Project for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. A "significant effect" as defined by the *CEQA Guidelines* §15382:

> "means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the "significance thresholds," which are those criteria adopted by the City and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the Proposed Project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the Project is approved per §15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under §15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The Proposed Project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could itself have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the Proposed Project in conjunction with other planned and pending developments in the area listed in Section 3, *Environmental Setting*.

The Executive Summary of this EIR summarizes the identified impacts and mitigation measures that apply to the Proposed Project.

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4.1 Aesthetics

The analysis in this section describes the current visual conditions in and around Mountain View and evaluates the potential aesthetic and visual impacts of buildout under the Proposed Project, including potential impacts related to scenic vistas, scenic resources, visual character and quality, and light and glare.

4.1.1 Setting

Existing Visual Conditions

The City of Mountain View is located in northwestern Santa Clara County, in the San Francisco Bay Area. The city is located in proximity to two prominent natural features: the San Francisco Bay ("the Bay"), located to the north, and the pronounced ridgelines of the Santa Cruz Mountain Range, located several miles to the west and south, which provide a visual backdrop to the city. The city takes its name from the vista of the Santa Cruz Mountains. The Baylands, or marshlands, are located directly north of the city and, together with Shoreline Park, form a buffer between Mountain View and the Bay. The city is bordered on all other sides by urbanized areas, including the City of Palo Alto to the northwest, the City of Sunnyvale to the east, and the City of Los Altos to the south and west. These cities are visually characterized by generally low-rise development, tree-lined residential streets, and corporate office parks of generally modern construction (City of Mountain View 2022).

Scenic Resources and Vistas

Neither the current Mountain View General Plan nor the City Code define visual resources within the city. However, what is considered "scenic" can generally be considered the environmental setting (i.e., scenic and visual qualities) within the public viewsheds that provide scenic value. Scenic resources typically include natural open spaces, unique mature trees, unique topographic formations, natural landscapes, and aspects of the built environment such as parks, trails, cultural resources, and architecturally significant buildings.

A viewshed is defined as the limits of what the viewer can see looking out from the limits of the Proposed Project. For the purposes of this analysis, the perspective of the viewer from public areas looking toward or from within these scenic resources is considered the viewshed. Using key features of the landscape as framing devices, viewsheds provide examples of what the viewer might see from anywhere within the scenic resource and are representative of what might be affected by a given project when the Proposed Project is implemented. For example, an area's topography can contribute to aesthetic value through the creation of view corridors and/or scenic vistas consisting of ridgelines and mountains that can form a community's visual backdrop. Viewsheds can also include a range of resources (including natural and man-made elements), and thus natural and man-made environments can be considered important scenic resources.

Mountain View takes its name from the views of the Santa Cruz Mountains to the south and west that are available throughout the city. Views of other natural features such as the Diablo Mountain Range to the southeast, Mission Peak to the east, San Francisco Bay to the north, and Stevens Creek in the eastern portion of the city are available from various locations within Mountain View. Views of the San Francisco Bay are generally only available from Shoreline Park in the North Bayshore Area. The City's 2030 General Plan emphasizes the importance of views of open space, the Bay, and the mountains as part of the city's sense of place (City of Mountain View 2012a).

Scenic Highways

California's Scenic Highway Program designates scenic highways with the intention of protecting these corridors from change that would diminish the aesthetic value of adjacent lands. A highway is designated as an official scenic highway when the local governing body (city or county) applies to the California Department of Transportation (Caltrans) for scenic highway approval, and Caltrans determines that the eligible scenic highway qualifies for official status (Caltrans 2025). Scenic highways must have an approved Corridor Protection Program and remain in compliance to maintain designated scenic highway status.

According to the Caltrans State Scenic Highway Mapping System, State Route (SR-) 9 is the only designated state scenic highway in Santa Clara County, located approximately 7.7 miles south of the city. A segment of SR-280 is designated as a State scenic highway ending at the county line with neighboring San Mateo County, located approximately 4.3 miles west of the city; however, the rest of SR-280 which traverses the city is eligible for state scenic highway designation but has not been officially designated. Similarly, a portion of SR-35 within San Mateo County is designated as a State scenic highway, and the portion within Santa Clara County is eligible but not officially designated. Caltrans also identifies portions of SR-17, SR-35, and SR-152 eligible (Caltrans 2019). These highways are shown on Figure 2-1 and Figure 2-2 in Chapter 2, *Project Description.* No officially designated State scenic highways are located in, or readily visible from, the City of Mountain View.

Visual Character

The City of Mountain View is generally suburban in character, defined by lower-rise buildings (typically one to two stories in height), extensive ornamental landscaping, and a low to moderate intensity of uses. The city includes several visually distinct neighborhood areas that are separated by major roadways, highways, and transit corridors, and which generally correspond with the planning areas identified in the Mountain View 2030 General Plan (City of Mountain View 2012a). Each of the city's geographic areas contains one or more commercial districts surrounded by residential land uses, with the exception of the North Bayshore area and the eastern portion of the Moffett/Whisman area, which contain predominantly office parks, light industrial, and research and development uses. Denser urban areas with taller buildings and more concentrated commercial activity are generally located in the Downtown area along Castro Street, as well as portions of El Camino Real.

The City identifies eight geographic "Planning Areas" within the city to guide the development of policy, planning, and design approaches for each area (City of Mountain View 2012a). The Proposed Project would include zoning changes and/or change to allowable development in the Monta Loma/Farley/Rock, Moffett/Whisman, San Antonio, Central Neighborhoods/Downtown, El Camino Real, Miramonte/Springer, and Grant/Sylvan Park Planning Areas. The Proposed Project would not include changes in the North Bayshore Planning Area; therefore, this area is not discussed further in this section.

Monta Loma/Farley/Rock

As discussed in the *Visual Resources* section of the Mountain View 2030 General Plan Draft Environmental Impact Report (EIR; City of Mountain View 2012b), the Monta Loma/Farley/Rock Planning Area is bordered by Highway 101 to the north; Shoreline Boulevard to the east; and the Central Expressway to the south. The western border is shared with the city of Palo Alto, and only a few streets exist to link the neighborhoods on either side of city limits. The visual character of the Monta Loma/Farley/Rock neighborhood is influenced by a number of broad, fast-moving, high-

volume traffic corridors, such as Middlefield Road and Rengstorff Avenue, which transect the area (see Figure 4.1-1, Photograph 1).

Development in the Monta Loma/Farley/Rock Street Area a variety of residential, commercial and industrial uses characterized by buildings from the 1950s to the present with unique footprint patterns. Residential areas tend to be a mix of Eichler residences, ranch houses, and medium-density two to three story apartment buildings. The Monta Loma neighborhood, one of Mountain View's oldest, has a strong sense of identity and community. Joseph Eichler designed many of the houses in the neighborhood during the post-World War II development boom of the 1940s and 1950s (Figure 4.1-1, Photograph 2). The smallest single-family buildings are located around Stevenson Park while the other neighborhoods feature larger residences. Residences generally follow the street layout with front and side setbacks, and larger rear yards that create green spaces at the center of blocks. While street edges are less defined than in denser areas, the transition between public and private spaces remains visually engaging.

Multi-family buildings are concentrated east of Rengstorff Avenue and south and east of Stevenson Park, ranging from duplexes to large apartment buildings. These buildings are typically aligned with the street but often have deep setbacks and parking lots that limit pedestrian interaction.

Retail, commercial and service-oriented uses are clustered along Old Middlefield Way and Shoreline Boulevard. Service-oriented commercial along Old Middlefield Way tends to be one story wood and stucco buildings with few windows. Commercial development is typically strip and shopping center-style buildings, often with dark wood detailing and shaded windows. Industrial and commercial buildings have the largest footprints, but vary greatly in size and are concentrated north of Middlefield Road around Rengstorff Avenue and Shoreline Boulevard. Within the Monte Loma area, the area surrounding Old Middlefield Way is characterized by a mix of commercial, medium-density residential, and industrial uses, including numerous auto-related establishments such as auto-body repair shops. Heavier industrial buildings are located in the eastern portion of the area close to Highway 101. A mix of single-family ranch-style residences and multi-family apartment buildings is located along Rock Street, Wynadotte Street, Colony Street, and Plymouth Street. Open spaces serve the neighborhood, including large parks associated with elementary and middle schools, as well as smaller spaces scattered throughout the area.

Moffett/Whisman

As discussed in the *Visual Resources* section of the Mountain View 2030 General Plan Environmental Impact Report (City of Mountain View 2012b), the Moffett/Whisman Road Area is located in the eastern part of the city, bounded by Highway 101 to the north; the City of Sunnyvale and SR-237 to the east; the Central Expressway to the south; and Shoreline Boulevard to the west. Limited connectivity across SR-85 creates a sense of separation from the rest of the city, with only a few streets and freeway ramps providing access. The area is served by two light rail stations: Whisman Station, surrounded by transit-oriented housing, and Middlefield Station, bordered by office buildings.

West of SR-85, the neighborhood includes multi-family housing, a mobile home park, and small offices and commercial uses along Moffett Boulevard. This corridor features a mix of strip malls (such as Moffett Plaza), hotels, and light industrial uses, with newer buildings offering improved street presence. Architectural styles range from modern corporate offices with glass facades to older tilt-up concrete buildings with stucco siding. The area includes two large public parks, Whisman Park (Figure 4.1-1, Photograph 3) and Slater School Park.

The residential neighborhoods are characterized by one- to two-story single-family and multi-family residential development, which include a mix of stucco and wood buildings, with tree-lined streets and sidewalks. A distinctive "wagon-wheel" theme runs through many of the buildings with exposed wood detailing. In some cases, the buildings closely follow street configuration and respond to one another such as when two buildings mirror each other to form a "U" shape pattern creating a protected open space between them. Unlike other neighborhoods, setbacks here do not form large green cores.

East of Whisman Road, land uses are primarily office or light industrial and serve as a major employment center within the city. The TOD neighborhood is characterized by two-story attached townhouse development built in 2000, typified by modern-style residences with narrow front yard setbacks with tree-lined narrow streets and sidewalks. There is a limited sense of continuity and cohesive character to the Moffett/Whisman Road Area due to the long distances between land uses.

Older residential neighborhoods west of Whisman Road resemble post-war ranch-style developments found elsewhere in the city. South of Middlefield Road, a mix of office, residential and public facilities exist (see Figure 4.1-1, Photograph 4). Whisman Park acts as a buffer between SR-85 and nearby residences and connects to Stevens Creek Trail.

San Antonio/Rengstorff

As discussed in the *Visual Resources* section of the Mountain View 2030 General Plan Environmental Impact Report (City of Mountain View 2012b), the San Antonio/Rengstorff Area is bounded by the Central Expressway to the north; Escuela Avenue to the east; Los Altos to the south; and the City of Palo Alto to the west. The San Antonio/Rengstorff Area is characterized by a mix of commercial, medium- and high-density residential uses, with multi-family housing as the dominant form. These developments are relatively large and dense, often oriented toward the street with courtyard-style layouts.

The Crossings is a transit-oriented development built in the 1990s around the San Antonio Caltrain station. This distinctive development is characterized by a range of one- to three-story residential building types with modern-style architecture (Figure 4.1-1, Photograph 5), and includes developments such as small lot single family, row houses, and multi-family units, as well as some minor retail uses directly adjacent to the station platform.

Commercial uses are centered at the San Antonio Shopping Center is identified as a city landmark in the Mountain View 2030 General Plan (Figure 4.1-1, Photograph 6). The San Antonio Shopping Center, an auto-oriented regional shopping center, consists of one- and two-story buildings surrounded by large surface parking areas. While the appearance of the Center is not architecturally distinctive, its urban form and regional draw makes it a familiar reference point in Mountain View (City of Mountain View 2012a and 2012b).

The area is defined by fast-moving arterial and collector roads—such as San Antonio Road, California Street, Latham Street, and El Camino Real—that connect it to surrounding neighborhoods but limit pedestrian access. The super-block layout of the shopping center further reduces walkability. Community amenities are concentrated around Rengstorff Park, the area's central public space, located at Cristano and Rengstorff Avenues.

Central Neighborhoods/Downtown

The Central Neighborhoods/Downtown Planning Area, or the "Central Planning Area", is bounded by the Central Expressway to the north, Calderon Avenue to the east, El Camino Real to the south, and South Shoreline Boulevard to the west. Downtown and is defined as the heart of Mountain View by the City's 2030 General Plan, with a lively, walkable transit-oriented, mixed-use character (City of Mountain View 2012a).

As described in the *Visual Resources* section of the Mountain View 2030 General Plan Environmental Impact Report (City of Mountain View 2012b), the Central Neighborhoods Area is predominantly residential in character, with primarily single-family residences located both east and west of Castro Street. Commercial uses are concentrated along Castro Street, the commercial spine of the Downtown, and at the southern edge of the Central Neighborhoods Area along El Camino Real. The area has a strong pedestrian character, with a narrow residential street grid that helps contribute to a pedestrian-friendly scale. Downtown itself is very walkable and includes multiple elements that contribute to a good pedestrian environment, such as a unique streetscape design, engaging building façades, and outdoor gathering areas.

The majority of development within the Central Neighborhoods Area has a distinctly historic character, both for commercial and residential buildings. Many of the older low-rise buildings along Castro Street have plaster facades with historic detailing that lend a unique identity to the Downtown (see Figure 4.1-1, Photograph 7). Over the years, additional modern commercial buildings have been infilled in the Downtown area. The residential sub-areas in the Central Neighborhoods area are predominantly characterized by small single-family residences in a variety of architectural styles, including Craftsman and Spanish Mission Revival. In the transition areas between the Downtown and the single-family neighborhoods, buildings tend to incorporate well-articulated architectural styles that incorporate detailing from the surrounding development styles.

Castro Street is the focus of commercial activity in the Downtown Area and is the city's main historic commercial corrido, lined with one- and two-story pedestrian-oriented shops and restaurants, many with outdoor seating. Large civic buildings such as City Hall, the Center for the Performing Arts, and the library are also located along (and near, in the case of the library) Castro Street (Figure 4.1-1, Photograph 8). Residential density increases closer to Castro Street, with townhomes and apartments transitioning to lower-density single-family residences farther out. Eagle Park (Figure 4.1-1, Photograph 9) and Pioneer Park are the Downtown Area's two largest parks, and are both located in its southwestern corner near El Camino Real.

El Camino Real

El Camino Real serves as a major commercial corridor with high traffic volumes and a mix of low- and medium-intensity retail, commercial, and multi-family residential uses (Figure 4.1-1, Photograph 10). The corridor includes strip malls, chain stores, hotels, auto dealerships, and repair shops, with buildings typically set back from the street and separated by parking lots or driveways, with structures ranging from two to four stories.

East of SR-85, the area features larger office buildings with stone, brick, and concrete facades. Other developments along El Camino Real include chain stores and strip malls, hotels/motels, and auto repair shops and dealerships. Most of the El Camino Real right-of-way is dedicated to vehicles, includes six travel lanes, two parking lanes, landscaped medians, and sidewalks on both sides. Located at the prominent intersection of SR-85 and El Camino Real, the Palo Alto Medical Foundation (Figure 4.1-1, Photograph 11) is identified as a city landmark in the Mountain View 2030

General Plan and is clearly visible and distinctive upon the entrance to Mountain View from Sunnyvale and on SR-85 (City of Mountain View 2022).

Miramonte/Springer

As described in the *Visual Resources* section of the Mountain View 2030 General Plan Environmental Impact Report (City of Mountain View 2012b), the Miramonte/Springer neighborhood is bounded by El Camino Real to the north, Grant Road to the east and the City of Los Altos to the south and west. This area is almost purely single-family residential with a homogeneous building footprint pattern, characterized by single-family ranch-style residences that are often wide and low built with wood or stucco (Figure 4.1-1, Photograph 12). A few multi-family complexes are located in proximity to El Camino Real, close to Graham School.

Medium-scale developments characteristic of commercial uses in the area are located along corridors such as El Camino Real and Grant Road. In these corridors, buildings have setbacks that allow for smaller parking lots in front (Figure 4.1-1, Photograph 13). These building footprints often contain smaller strip center retail. Commercial uses, including a mix of retail and neighborhood and office commercial, line the northern edge along El Camino Real. Development along El Camino Real is characteristic of 1970s and 1980s strip commercial architectural styles.

Key institutions in the area include El Camino Hospital, Saint Francis High School, and several schools. Open spaces like Cuesta Park are well-distributed but disconnected, with no trail system linking them. The area's layout reflects a distinctly suburban character.

Grant/Sylvan Park

As described in the *Visual Resources* section of the Mountain View 2030 General Plan Environmental Impact Report (City of Mountain View 2012b), the Grant/Sylvan Park neighborhood is bounded by the Central Expressway to the north; City of Sunnyvale to the east and south; and SR-85 and Grant Road to the west. The southern portion features cohesive single-family residences, while areas near El Camino Real include a mix of single- and multi-family housing, commercial, mobile homes, and office uses.

This residential sub-area to the south of El Camino Real is characterized by ranch-style residences and tend to be low and wide, single-story houses with large garages and front lawns. The residential sub-area to the north of El Camino Real and east of SR-85 is characterized by 20 to 30 feet high single-family residences around Sylvan Park (Figure 4.1-1, Photograph 14). These houses are distinguished by their steeply pitched roofs, large garages and wood clapboard siding. Other residential developments in this area include low-rise single-family and small multi-family units from the 1970s.

Commercial and industrial uses located between Central Expressway, SR-85 and SR-237, have large building footprints with lots of space around them often used as surface parking (Figure 4.1-1, Photograph 15). These buildings do not follow the street orientation, giving the impression that the layout was designed to maximize functionality, and not necessarily in response to the street pattern. Stevens Creek Trail runs north-south through the area, intersecting major transportation corridors. Key community amenities include the El Camino and Grant shopping center, Mountain View High School, and Springer Elementary School.

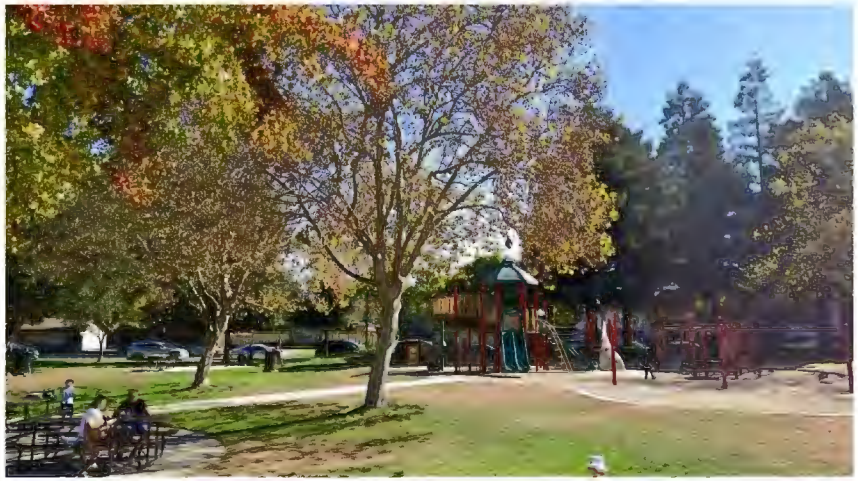
Figure 4.1-1 Existing Visual Character



Photograph 1. Traffic corridor at the intersection of Old Middlefield Way and Rengstorff Avenue, looking southeast. (Google Earth 2025a)



Photograph 2. Eichler-designed residence in Monta Loma neighborhood, looking south. (Google Earth 2025b)



Photograph 3. Whisman Park near Easy Street, looking southeast. (Google Earth 2025c)



Photograph 4. Mix of office and residential land uses along Ferguson Drive near Circuit Way, looking west. (Google Earth 2025d)



Photograph 5. Transit-oriented development at The Crossings near the intersection of Sondgroth Way and Concord Circle, looking southwest. (Google Earth 2025e)



Photograph 6. San Antonio Shopping Center, looking east. (Google Earth 2025f)



Photograph 7. Pedestrian-scale design and historic features along Castro Street, looking southeast. (Google Earth 2025g)



Photograph 8. City Hall and the Center for the Performing Arts at the intersection of Castro and Mercy Streets, looking northwest. (Google Earth 2025h)



Photograph 9. Entry to Eagle Park from High School Way, looking northeast. (Google Earth 2025i)



Photograph 10. Mixed commercial-residential uses at the corner of El Camino Real and South Pastoria Avenue, looking northwest. (Google Earth 2025j)



Photograph 11. Palo Alto Medical Foundation at the corner of El Camino Real and The Americana, looking west. (Google Earth 2025k)



Photograph 12. Single-family residences typical of the Miramonte/Springer area, located along Nilda Avenue, looking south. (Google Earth 2025l)



Photograph 13. Small commercial strip with front parking lot along El Camino Real, looking southwest. (Google Earth 2025m)



Photograph 14. Characteristic residential development around Sylvan Park along Sullivan Drive, looking south. (Google Earth 2025n)



Photograph 15. Commercial and industrial uses with surface parking near the intersection of East Dana Street and Pioneer Way, looking southeast. (Google Earth 2025o)



Photograph 16. Gateway into the City of Mountain View from Highway 101, looking south along North Shoreline Boulevard. (Google Earth 2025p)

Gateways and Landmarks

Gateways

As discussed in the *Visual Resources* section of the Mountain View 2030 General Plan EIR, gateways are the entries to a city, district, or neighborhood which act as a point of distinction between different areas and contribute to a sense of place by announcing a threshold or a passage into a place, while also reinforcing the unique identity of that place (City of Mountain View 2012a). Gateways in Mountain View are generally associated with the city's major transportation corridors, particularly those which cross the jurisdictional boundaries of Palo Alto, Los Altos, and Sunnyvale, and rail stations along the Central Expressway.

The northern quarter of the city is segmented by U.S. Highway 101 (US 101), which runs east to west across the city. Shoreline Boulevard serves as a gateway into downtown Mountain View, located in the city's center, from US 101 (Figure 4.1-1, Photograph 16). Camino Real and East Evelyn Avenue bisect the city, running east to west, and serve as gateways to the city from Palo Alto and Sunnyvale. Other gateways include those located at the convergence of Old Middlefield Way and Middlefield Road, located near at the city's northwestern border with Palo Alto; Grant Road at the city's southern border with Los Altos; and transitions between bordering cities along the Central Expressway.

Landmarks

As defined in the *Visual Resources* section of the Mountain View 2030 General Plan Draft EIR, landmarks are external points of reference that are usually simply defined physical objects (e.g., a building or sign). Some landmarks are very large and seen at great distances, and some landmarks are very small (e.g., a tree within an urban square) and can only be seen close up. Landmarks are an important element of urban form because they help people to orient themselves in the city and help identify an area (City of Mountain View 2012b). Many of the city's landmarks are historical in nature or were identified as landmarks in the City's 2030 General Plan, and are described below.

Adobe Building. The historic Adobe Building was built during the Great Depression as part of the Civil Works Administration public assistance program and restored in 2001.

Civic Center. The Mountain View Civic Center stands out in Downtown with its unique architecture and distinctive color palette. Built in 1991, the Civic Center is oriented towards a central plaza that provides a distinct gathering space for the community in the Downtown.

El Camino Hospital. The El Camino Hospital is a significant collection of buildings and a destination within the city. Its northern edge interfaces with Cuesta Park, and the hospital buildings range from three to 10 stories. El Camino Hospital is a landmark due to its role as one of the primary medical facilities in the city, and the significant scale and massing of buildings on the hospital campus.

Mountain Bay Plaza. Mountain Bay Plaza, built in 1970 and extensively remodeled in the early 2000's, is a Class A office building located on Castro Street in Downtown. It is a significant structure in the Downtown as it rises to 12 stories; its height and location in the city make it a notable landmark.

Palo Alto Medical Foundation – Mountain View Center. Located at a prominent location at the intersection of SR-85 and El Camino Real, the Palo Alto Medical Foundation is clearly visible and distinctive upon the entrance to Mountain View from Sunnyvale and on SR-85. The three-story medical center opened in 2007 and is 250,000 square feet.

San Antonio Center. Large buildings, expansive parking lots, and a signage feature at the junction of San Antonio Road and El Camino Real distinguish the San Antonio Center, a regional shopping destination in the city. The signage feature is a columnar element that harkens to the establishment of the Center in the 1950s and 1960s, and is visible from a distance along both El Camino Real and San Antonio Road. While the appearance of the Center is not architecturally distinctive, its urban form and regional draw makes it an easy reference point in Mountain View.

Light and Glare Conditions

For the purpose of this analysis, light refers to light emissions (brightness) generated by a source of light. Existing development and motor vehicles in Mountain View produce light and glare. Stationary sources of light include exterior building lighting, lighted signage (e.g. neon and fluorescent signs), exterior parking lot lighting, building security lighting, streetlights, and lighting from the Shoreline Amphitheatre; moving sources of light include the headlights of vehicles driving on roadways.

Glare is defined as focused, intense light emanating directly from a source or indirectly when light reflects from a surface. Daytime glare is caused in large part by sunlight shining on highly reflective surfaces at or above eye level. Glare also refers to the discomfort or impairment of vision experienced when a person is exposed to a direct or reflected view of a light source, causing objectionable brightness that is greater than that to which the eyes are adapted. Reflective surfaces are associated with buildings that have expanses of polished or glass surfaces, light-colored pavement, and the windshields of parked cars. General sources of glare in Mountain View include reflected sunlight from the Bay, building windows, automobile windows, and from glass building façades.

4.1.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations pertaining to aesthetics that are applicable to the Proposed Project.

b. State Regulations

Caltrans Scenic Highways

Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way, which traverses an area of exceptional scenic quality. Suitability for designations as a state scenic highway is based on the vividness, intactness, and unity of their view corridors (Caltrans 2023):

- **Vividness** is the extent to which the landscape is memorable. This is associated with the distinctiveness, diversity, and contrast of visual elements. A vivid landscape makes an immediate and lasting impression on the viewer.
- **Intactness** is the integrity of visual order in the landscape and the extent to which the natural landscape is free from visual intrusions (e.g., buildings, structures, equipment, grading).
- **Unity** is the extent to which development is sensitive to and visually harmonious with the natural landscape.

As discussed in Section 4.1.1, *Setting*, there are no state-designated scenic highways in the City of Mountain View.

Housing Crisis Act (SB 330, 2019)

The Housing Crisis Act of 2019 (SB 330) seeks to accelerate housing production by eliminating some of the most common entitlement impediments to the creation of new housing. These may include delays in the local permitting process and cities enacting new requirements after an application is complete and undergoing local review—both of which can exacerbate the cost and uncertainty that sponsors of housing projects face. As relevant to the aesthetics context, the Act prohibits cities from applying subjective design standards that were not in place as of January 1, 2020. In addition to speeding up the timeline to obtain building permits, the bill prohibits local governments from reducing the number of residences that can be built through down-planning or down-zoning or the introduction of new discretionary design guidelines. On September 16, 2021, SB 8 was signed into law which made some clarifications and updated SB 330, extending the Housing Crisis Act from January 1, 2025 to January 1, 2030.

Public Resource Code Section 21099

The California Public Resource Code (PRC) Section 21099, enacted through Senate Bill 743, is intended to streamline infill development and support state goals for greenhouse gas reduction and transit-oriented growth, and includes updates and exclusions for CEQA transportation and aesthetics analyses for projects in transit priority areas (i.e., infill areas within 0.5-mile of a major transit stop). Regarding aesthetics, PRC Section 21099(d) states:

(1) Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.

(2)(A) This subdivision does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies.

(2)(B) For the purposes of this subdivision, aesthetic impacts do not include impacts on historical or cultural resources.

Title 24 Outdoor Lighting Standards

As published in Section 6 of the California Code of Regulations, Title 24 is a broad set of requirements for energy conservation, green design, construction and maintenance, fire and life safety, and accessibility that apply to the structural, mechanical, electrical, and plumbing systems in a building. The code applies to all buildings in California. California updates its energy code every three years. Construction projects with permit applications applied for on or after January 1, 2023 must follow the 2022 Energy Code. If a permit is applied for before then, buildings follow the 2019 Building Efficiency Standards. The code includes energy efficiency standards for outdoor lighting for both the public and private sector. The standards regulate lighting characteristics such as, maximum power and brightness, shielding, and sensor controls to turn lighting on and off.

c. Regional Regulations

Plan Bay Area 2050

Mountain View is located within the Association of Bay Area Governments (ABAG) planning area. ABAG functions as the Metropolitan Planning Organization (MPO) for Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma Counties, and is responsible for

implementing the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is called Plan Bay Area 2050 (ABAG 2021). Plan Bay Area 2050 is a long-range integrated transportation and land-use/housing strategy for the San Francisco Bay Area through 2050. Chapter 5 of Plan Bay Area 2050 provides a long-range vision for the built and natural environment, including considerations for the natural landscape and its importance to the visual and scenic character of the Bay Area.

d. Local Regulations

Mountain View 2030 General Plan

The Mountain View 2030 General Plan serves as the City's primary framework for guiding physical development and preservation. It outlines long-term goals, policies, and visual elements to inform local planning decisions. The Land Use and Design Element of the 2030 General Plan contains the following goals and policies related to visual character, visual quality, scenic views, and light and glare that are applicable to the Proposed Project:

Goal LUD-6: Distinctive neighborhoods that preserve and enhance the quality of life for residents.

Policy LUD 6.1: Neighborhood character. Ensure that new development in or near residential neighborhoods is compatible with neighborhood character.

Policy LUD 6.3: Street Presence. Encourage street facades and frontages that create a presence at the street and along interior pedestrian paseos or pathways.

Goal LUD-7: A vibrant Downtown that serves as the center for Mountain View social and civic life.

Policy LUD 7.3: Human-scaled building details. Support new and renovated Downtown buildings that include human-scaled details such as transparent windows on the ground floor that face the street, awnings and architectural features to create a comfortable and interesting pedestrian environment.

Policy LUD 7.5: Compatible uses and design. Ensure compatible uses and building design Downtown along the boundaries between residential and commercial areas.

Policy LUD 8.1: City Gateways. Emphasize city gateways that create a distinct and positive impression

Goal LUD-9: Buildings that enhance the public realm and integrate with the surrounding neighborhood.

Policy LUD 9.1: Height and setback transitions. Ensure that new development includes sensitive height and setback transitions to adjacent structures and surrounding neighborhoods.

Policy LUD 9.3: Enhanced public space. Ensure that development enhances public spaces through these measures:

- Encourage strong pedestrian-oriented design with visible, accessible entrances and pathways from the street.
- Encourage pedestrian-scaled design elements such as stoops, canopies and porches.
- Encourage connections to pedestrian and bicycle facilities.
- Locate buildings near the edge of the sidewalk.
- Encourage design compatibility with surrounding uses.

- Locate parking lots to the rear or side of buildings.
- Encourage building articulation and use of special materials to provide visual interest.
- Promote and regulate high-quality sign materials, colors and design that are compatible with site and building design.
- Encourage attractive water-efficient landscaping on the ground level.

Policy LUD 9.5: View preservation. Preserve significant viewsheds throughout the community.

Policy LUD 9.6: Light and glare. Minimize light and glare from new development.

Goal LUD-10: High-quality, sustainable and healthful building design and development.

Policy LUD 10.1: Sustainable design and materials. Encourage high-quality and sustainable design and materials.

Policy LUD 10.2: Low-impact development. Encourage development to minimize or avoid disturbing natural resources and ecologically significant land features.

Mountain View Housing Element

The Housing Element is required by the General Plan. The purpose of the Housing Element is to identify and analyze existing and projected housing needs in order to preserve, improve, and develop housing for all economic segments of the community, consistent with Regional Housing Needs Allocation regulations. The city adopted its current Housing Element in 2023 as part of the 2023-2031 planning cycle. The Housing Element describes characteristic features of various housing development types and identifies Precise Plan areas (Downtown, San Antonio, El Camino Real, East Whisman, and North Bayshore) and the residential development standards therein – including those related to the maintenance and improvement of the visual character and quality of neighborhoods within the city (City of Mountain View 2023).

Mountain View City Code

Mountain View City Code Chapter 36 (Zoning), Article XVI (Zoning Ordinance Administration) outlines the development review process and procedures for the discretionary review of development throughout the city in order to ensure that new development and changes to existing developments: (1) comply with city development requirements and policies; (2) maintain or enhance the appearance of the community; (3) maintain property values through quality development; (4) ensure compatibility of private development with surrounding properties and neighborhoods, public rights-of-way and other facilities; and (5) in reviewing new residential development, strong emphasis is given to the compatibility of the new development with the surrounding development, including its intensity, density, scale, bulk, height, setbacks, open space, building orientation and architectural style and design. Section 36.44.20 assigns oversight of the design review process to a deputy zoning administrator. Chapter 36 (Zoning), Article XVI (Zoning Ordinance Administration), Division 15 (Designation and Preservation of Historic Resources) City enforces the protection of historic resources, and the preservation of character-defining features of historic resources. Chapter 36, Article XI, establishes landscaping standards, including those for visual screening and streetscaping. Chapter 32, Article II, includes protections for the urban forest throughout the city, and limits removal of heritage trees.

Mountain View Standard Conditions of Approval

As part of discretionary review, the City has standard conditions for different types of approvals. The standard conditions of approval related to aesthetics include the following:

Building Design/Plan Modifications

Based on direction from the Development Review Committee (DRC), modifications shall be made to the architectural design, building materials, colors, landscaping, and/or other site or building design details prior to issuance of a building permit and shown on building permit drawings. The modifications are subject to review and approval by the Zoning Administrator to confirm compliance with the DRC's recommendation.

Exterior Materials

High-quality materials and finishes shall be used throughout the project and shall remain in compliance with the materials identified in the approved plans, except as modified by the conditions of approval herein. Details regarding all color and architectural details shall be provided in the building permit plan submittal and shall be subject to review and approval by the Zoning Administrator prior to the issuance of building permits.

Lighting Plan

The applicant shall submit a lighting plan in building permit drawings. This plan should include photometric contours, manufacturer's specifications on the fixtures, and mounting heights. The design and location of outdoor lighting fixtures shall ensure there will be no glare and light spillover to surrounding properties, which is demonstrated with photometric contours extending beyond the project property lines. The lighting plan submitted with building permit drawings must be approved by the Zoning Administrator prior to building permit issuance.

Landscaping

The City's Standard Conditions of Approval also include protections for "heritage" and other "protected" trees, including guidance and requirements for: Landscaping, Arborist Reports, Arborist Inspections, Monthly Arborist Inspections, Tree Removals, Replacement Trees, Street Tree Protections, Tree Protection Measures, Irrevocable Damage to Heritage Trees, Tree Relocation(s), Off-Site Tree Mitigation, and Tree Replacement Fees.

4.1.3 Impact Analysis

Methodology and Thresholds of Significance

Methodology

The assessment of aesthetic impacts involves qualitative analysis that is informed by the goals of applicable land use plans and generally accepted, industry-wide design standards. Different viewers react to views and aesthetic conditions differently, and this analysis considers the existing character of the city and the goal to weave together the visual character of the landscape, the current development, and new development to account for the visual aspects of Mountain View that make it unique and provide a "sense of place" for residents and visitors. This section evaluates the anticipated changes to the city's visual environment that could result from buildout of the Proposed

Project, based on the goals, policies, and characterizations of aesthetic resources in the 2030 General Plan. It is important to underscore that the Proposed Project does not contain specific development proposals, but provides updated development standards that will guide projects as they are conceived, proposed, and implemented. This analysis therefore focuses on land use changes envisioned under the Proposed Project, and the aesthetic impacts in terms of the arrangement of built development and open space; density and intensity of development; and height, massing, and other key aspects that define aesthetic environmental concerns, according to the thresholds of significance discussed below. This evaluation is limited to public views, as impacts to private views do not constitute an environmental impact under CEQA. Photographs of the city were reviewed in preparation of this analysis, along with Google Earth imagery and other online visual sources.

SCENIC VISTAS AND SCENIC RESOURCES

The evaluation of potential impacts to scenic vistas and scenic resources is based on review of the Project area and surrounding environment. In determining the level of significance, this analysis focuses on the nature and magnitude of visual change in relationship to scenic vistas and scenic resources, the number of public vantage points from where this change would be visible, and the number of viewers who would be affected by this change. In addition, this analysis considers viewer sensitivity as a function of the visibility of resources in the landscape, the proximity of the viewers to the visual resource, elevation of the viewers relative to the visual resource, frequency and duration of views, numbers of viewers, and types and expectations of individuals and viewer groups.

VISUAL CHARACTER

Public Resources Code Section 21071 defines an urbanized area as:

1. An incorporated city that has either:
    a. A population of at least 100,000 persons, or
    b. A population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.

Pursuant to Public Resources Code Section 21071, Mountain View is an urbanized area because the City has a population of 86,513 which, when combined with the population of the contiguous cities of Palo Alto (68,253) or Sunnyvale (155,335) exceeds the population requirements (100,000) for an urbanized area (Department of Finance 2025). Impacts on visual character or quality are evaluated relative to visual conditions under buildout, as determined by existing experiences from public viewpoints in and around the project area. Pursuant to CEQA Guidelines Appendix G, given that the Proposed Project would facilitate development in an urbanized area, the impact discussion of visual character and views is focused on adherence to applicable zoning and other regulations governing scenic quality.

LIGHT AND GLARE

The analysis of light and glare impacts focuses on the nature and magnitude of changes in light and glare conditions associated with implementation of the Proposed Project on the project area and surroundings. If proposed and existing light and glare conditions are similar, then the visual compatibility would be high. If the proposed light and glare conditions strongly contrast with existing light and glare conditions or conflict with applicable policies and guidelines, then light and glare compatibility would be low, and significant impacts may result.

Significance Thresholds

To determine whether a project would result in a significant impact related to Aesthetics[1], Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

1. Have a substantial adverse effect on a scenic vista;
2. Substantially damage scenic resources, including, but not limited to, unique mature trees, unique rock outcroppings, and historic buildings within a State scenic highway;
3. Conflict with applicable zoning and other regulations governing scenic quality; and/or
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Project Impacts and Mitigation Measures

Threshold 1:	Would the project have a substantial adverse effect on a scenic vista?

Impact AES-1 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD FACILITATE INCREASED DEVELOPMENT MASSING AND SCALE ON CERTAIN PARCELS IN MOUNTAIN VIEW, WHICH COULD AFFECT SCENIC VIEWS. HOWEVER, SCENIC VIEWS OF NATURAL FEATURES ARE LARGELY OBSCURED BY EXISTING DEVELOPMENT AND OTHER INTERVENING FEATURES IN THESE AREAS, AND COMPLIANCE WITH THE PROPOSED DEVELOPMENT STANDARDS, THE MOUNTAIN VIEW GENERAL PLAN, AND THE CITY CODE WOULD FURTHER ENSURE THE PROTECTION OF AVAILABLE SCENIC VISTAS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As described in Section 4.1.1, *Setting,* scenic views of open space, the Bay, and the mountains are available within Mountain View. The Proposed Project would apply to 8,350 parcels in urban or suburban areas generally concentrated south of Highway 101 and north of Cuesta Park. In the affected parts of the city, the Bay is generally not visible from public viewpoints near the Project area, such as streets and parks, due to intervening features (i.e. structures, topography, distance). Available views of natural features such as open space and the mountains are also limited and largely obscured by existing development, and generally only occasional "peek-through" views of the distant mountains are available from public viewpoints.

The P Proposed Project would result in rezoning, land use designation changes, new development standards, and/or modifications to allowable development under the R3 Multifamily Residential Zoning Code, including increased density and building scale. As discussed in Chapter 2, *Project Description*, the Project could accommodate an estimated increase of up to 16,000 new dwelling units in the Project area, which includes R3-zoned parcels and select R2-zoned parcels to be integrated into the R3 Zoning District throughout the city. Development facilitated by the Proposed Project would generally occur on sites that have already been developed, or infill sites that are surrounded by existing development where, as discussed in the previous paragraph, views of scenic resources such as the Bay or mountains are severely limited. Increased density and development standards, resulting in the potential for increased massing and building scale on currently vacant or underdeveloped lots could potentially block portions of these limited and intermittent views of scenic features. In addition, development facilitated by the Project would be required to adhere to the City Code and the General Plan, including Policy 9.5, which is intended to preserve views.

[1] Pursuant to PRC §21099(d), future project-specific analyses may not be required to consider aesthetic impacts if the given project meets the qualifications for exclusion as defined by PRC Section 21099 (see Section 4.1.2 for description).

Development and redevelopment facilitated by the Project would occur within the urbanized context of the city and transit priority areas and be governed by the policies, rules, and regulations included in the Mountain View General Plan (e.g., Policy 9.5) and City Code (e.g., Chapter 36 Article XVI), as well as objective development standards contained in the Proposed Project, which would be applied and enforced through the City's standard development review procedures that concern the protection of public views or scenic vistas. Further, as detailed in Section 4.1.2, PRC §21099(d) provides that aesthetic impacts of qualifying infill Projects within a transit priority area would not be considered significant. Therefore, impacts to scenic vistas would be less than significant.

Mitigation Measures

This impact would be less than significant without mitigation. Mitigation would not be required.

Threshold 2:	Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact AES-2 THERE ARE NO DESIGNATED STATE SCENIC HIGHWAYS IN THE VICINITY OF THE PROPOSED PROJECT. NO IMPACT TO SCENIC RESOURCES WITHIN A STATE SCENIC HIGHWAY WOULD OCCUR.

As described in Section 4.1.1, there are no designated state scenic highways in the vicinity of the Project area. Individual parcels within the Project area are not visible from a designated scenic highway. Consequently, the Proposed Project would not have the potential to result in damage to scenic resources within a state scenic highway. No impact would occur.

Mitigation Measures

There would be no impact and mitigation would not be required.

Threshold 3:	Would the project conflict with applicable zoning and other regulations governing scenic quality?

Impact AES-3 THE PROPOSED PROJECT WOULD FACILITATE AN INCREASE IN BUILDING DENSITY, MASSING, AND HEIGHT WHICH COULD POTENTIALLY OBSCURE OR BLOCK PUBLIC VIEWS. THE PROPOSED PROJECT INCLUDES NEW, OBJECTIVE FORM-BASED DEVELOPMENT STANDARDS, AND VISUAL CHARACTER AND SCENIC QUALITY WOULD ALSO BE PROTECTED THROUGH ADHERENCE TO CITY DESIGN GUIDELINES AND IMPLEMENTATION OF GOALS AND POLICIES IN THE CITY'S GENERAL PLAN AND CITY CODE THAT ADDRESS VISUAL CHARACTER AND QUALITY OF PUBLIC VIEWS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As described in Section 4.1.1, given that the Proposed Project would facilitate development in an urbanized area, this impact discussion is focused on adherence to applicable zoning and other regulations governing scenic quality. The Proposed Project would result in the rezoning, land use designation change, and/or change to allowable development under the R3 Multifamily Residential Zoning Code which would result in new development standards and/or an increase in allowed height, massing, and density.

New objective form-based development standards (e.g. height, massing, density, setbacks, lot size, floor area ratio, parking requirements) for the R3 Zoning District would be implemented through the City's design review process to improve development feasibility, reflect contemporary building types, promote compatibility with surrounding land uses, create pedestrian-friendly neighborhoods, incorporate cohesive and respectful transitions, increase tree canopy and landscaping, address State laws, and allow small neighborhood commercial uses and live-work when permitted. Objective

standards, as opposed to subjective standards, are defined under state law as standards that involve no personal or subjective judgement by a public official and standards that can be verified by referencing established criteria. The intent of the objective form-based development standards is to provide a clear set of standards and design expectations for the R3 District which are cohesive with the existing character and vision of the city and developed in accordance with the Mountain View 2030 General Plan objectives and City Code regulations governing scenic quality.

Trees protected by the City Code (Article II, Sections 32.24 – 32.29) occur throughout the Project area and may occur on the rezone sites. The City Code includes tree removal and protection requirements for street trees and "heritage" trees, including permitting, and root zone protection, as well as Standard Conditions of Approval for protected trees such those related to arborist reporting and inspections, tree relocation, replacement, and mitigation. Development facilitated by the Proposed Project would be required to comply with these regulations to ensure no significant visual impacts to scenic quality result from the removal of trees.

Development facilitated by the Project would be required to comply with the goals and policies of the Mountain View 2030 General Plan to ensure consistency with regulations governing visual quality and character. Goal LUD-6 and Policies LUD 6.1, 7.5, 8.1, and 9.1 ensure the preservation and enhancement of neighborhood character and compatible development; Goals LUD-7 and LUD-9 and Policies LUD-6.3, LUD-7.3, and LUD-9.3, preserve and enhance pedestrian-oriented and human-scaled design characteristic of the city; and Policy LUD-9.5 preserves public scenic views. Furthermore, development facilitated by the Proposed Project would be required to address potential visual impacts on a Project-by-Project basis through the City's development review process (codified in Chapter 36, Article XVI of the City Code, which is not proposed to be amended), in accordance with the proposed objective development standards (if adopted) as well as any analysis of aesthetic and visual impacts that may be required by CEQA for future discretionary Projects. As part of the City's development and design review, City staff would ensure that new development and redevelopment Projects comply with the City's development requirements and policies, including the City's General Plan goals related to preservation of public views and visual character, and are compatible with surrounding properties in land use and design prior to the issuance of building permits. Thus, the Proposed Project would not conflict with applicable zoning or other regulations governing scenic quality.

Adherence to City design and development standards and review processes, the proposed objective form-based development standards, General Plan goals and policies, and Mountain View City Code requirements would ensure that future development is of high visual quality, is visually coherent, and complies with existing regulations. Therefore, the Proposed Project would not conflict with applicable zoning or other regulations governing scenic quality. Impacts would be less than significant.

Mitigation Measures

This impact would be less than significant without mitigation. Mitigation would not be required.

Threshold 4:	Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact AES-4 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD CREATE NEW SOURCES OF LIGHT OR GLARE THAT COULD ADVERSELY AFFECT DAYTIME OR NIGHTTIME VIEWS IN THE AREA. COMPLIANCE WITH THE 2030 GENERAL PLAN DEVELOPMENT STANDARDS RELATED TO LIGHTING AND GLARE WOULD ENSURE THIS IMPACT IS LESS THAN SIGNIFICANT.

As described in Section 4.1.1, the Project area is generally developed, and ambient light from urban and suburban uses already exists. Existing sources of light and glare are consistent with urban development and include, but are not limited to, car headlights, streetlights, exterior building lighting, lighted signs, and reflective surfaces such as vehicles and building windows.

Sensitive light and glare receptors include residences in the vicinity of the Proposed Project. Development facilitated by the Project could create new sources of light from exterior building illumination and outdoor lighting, including vehicular traffic, and glare from reflective building surfaces and vehicle surfaces. As a result, these new sources of light or glare could affect adjacent light-sensitive land uses. The areas most likely to experience increased lighting are those closest to locations with the highest development potential. Some reflective material could be unavoidable, such as glass used in windows of new buildings; increased building density and allowed building heights would increase these sources of glare. However, glare from building windows would be similar to and consistent with existing conditions in the Project area, and the City's design review and approval processes conducted in accordance with City Code Chapter 36, Article XVI would ensure that sources of potential glare would be minimized.

As discussed in Section 4.1.2, *Regulatory Setting*, the City's development guidelines and City Code provide lighting regulations, with which future development would be required to comply. Examples of these standards include City Code Section 8.242, which requires lighting for multi-family dwellings to be on an automatic system and designed and shielded to prevent offsite illumination and glare or nuisance. Additionally, General Plan Policy LUD-9.6 requires the minimization of light and glare from new development. Development facilitated by the Proposed Project would be required to address potential visual impacts on a project-by-project basis through the City's development review process (Chapter 36, Article XVI of the City Code), in accordance with the proposed objective development standards (if adopted) as well as any analysis of aesthetic and visual impacts that may be required by CEQA for future discretionary projects.

As part of the City's development and design review, a deputy zoning administrator would be assigned to ensure that new development and redevelopment projects comply with the City's development requirements and policies, including City General Plan Policy LUD-9.6 and City Code requirements (e.g., Chapter 36, Article XVI and Section 8.242) related to minimization of offsite glare and illumination (described above), prior to the issuance of building permits. Accordingly, highly reflective materials capable of generating substantial amounts of glare would be avoided in development. In addition, as previously described, Standard Conditions of Approval (Lighting Plan) and the City's development review process would ensure that the architecture and urban design of new developments would protect the city's visual environment including ensuring that new development does not generate adverse light and glare. Required adherence to applicable City policies, regulations, standard conditions of approval, and development standards would ensure that the Proposed Project would not create new sources of substantial light or glare that would adversely affect day or nighttime views in the area, and this impact would be less than significant.

Mitigation Measures

This impact would be less than significant without mitigation. Mitigation would not be required.

4.1.4 Cumulative Impacts

IMPACT AES-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA, WOULD NOT SUBSTANTIALLY DAMAGE SCENIC RESOURCES WITHIN A STATE SCENIC HIGHWAY, WOULD NOT DEGRADE EXISTING VISUAL CHARACTER, AND WOULD NOT ADVERSELY AFFECT NIGHT SKY LIGHTING. CUMULATIVE AESTHETIC IMPACTS WOULD BE LESS THAN SIGNIFICANT, AND THE CONTRIBUTION OF THE PROJECT WOULD NOT BE CUMULATIVELY CONSIDERABLE.

The geographic scope for cumulative aesthetic impacts is the City of Mountain View. This geographic scope is appropriate because scenic views from any given location within the city are minimal due to surrounding development and intervening features obstructing views in all directions from the Proposed Project area. Cumulative buildout in this region, including projects listed in Table 3-1, would have the potential to adversely impact aesthetics.

Buildout of cumulative projects would have limited, site-specific impacts on public viewsheds and scenic vistas throughout the Proposed Project area due to intervening features (i.e. topography, vegetation, and buildings) largely obscuring scenic resources in the area. Most of the cumulative projects would not result in substantial impacts to public viewsheds or scenic vistas given the proposed massing and heights of structures, or the proposed locations within developed areas with comparable structures. However, cumulative projects located within the North Bayshore Planning Area have the potential to impact scenic vistas of the Bay due to their proximity to the waterfront and increased areas of variable open space which provide greater availability of scenic views. The Project area is not located in the North Bayshore Planning Area and thereby would not contribute to a cumulatively considerable impact. Cumulative projects would also undergo design review and/or environmental review to mitigate adverse effects to scenic vistas to the extent feasible. Cumulative adverse impacts to scenic vistas (Impact AES-1) would be less than significant, and the Project's contribution to these impacts would not be cumulatively considerable.

There are no designated or eligible state scenic highways within the City of Mountain View. Thus, no cumulative adverse impacts to scenic resources within a state scenic highway (Impact AES-2) would occur.

The visual character of Mountain View is protected through the City Code, development regulations, General Plan, and design and development review process. Compliance with applicable General Plan and City Code policies would ensure that cumulative development projects do not substantially impact the existing visual character of the community or the quality of public views. Discretionary projects would also undergo environmental and design review, including consideration of whether the projects would substantially degrade the existing visual character or quality of public views of a given site and its surroundings, and would also undergo the City's project design and development review processes. Cumulative impacts related to visual character and the quality of public views (Impact AES-3) would be less than significant, and the Project's contribution to these impacts would not be cumulatively considerable.

Although cumulative projects, and specifically in the Project vicinity, are primarily focused on infill areas, expanded development would result in new sources of light and glare that would be visible from proximate roads and residences. Cumulative projects would be required to undergo individual design review, and regulations that govern light and glare would apply to cumulative projects, which

would ensure adherence to applicable General Plan and City Code standards related to minimizing sources of light and glare. Compliance with applicable General Plan and City Code policies as well as the City's design and development review process would minimize substantial new sources of light and glare in the region from cumulative development projects. Cumulative impacts associated with new sources of light and glare (Impact AES-4) would be less than significant, and the Project's contribution to these impacts would not be cumulatively considerable.

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4.2 Air Quality

This section evaluates the impacts of the Proposed Project upon local and regional air quality. Both temporary impacts relating to construction activity and long-term impacts associated with population growth and associated growth in vehicle traffic and energy use are discussed.

4.2.1 Setting

Local Climate and Meteorology

The city of Mountain View is located in the San Francisco Bay Area Air Basin (SFBAAB), which is under the jurisdiction of the Bay Area Air District (Air District). Air quality in the basin is affected by the region's emission sources and by natural factors. Topography, wind speed and direction, and air temperature gradient all influence air quality. The SFBAAB has a Mediterranean climate, with warm, dry summers and cool, damp winters.

The SFBAAB typically has high concentrations of pollutants due to its relatively high population density and because it includes the Bay Area's major metropolitan areas. Air pollution potential is highest along the southeastern portion of the San Francisco Peninsula because that area is most protected from the winds and fog of the marine layer. Pollutants are also transported there from upwind sites.

Air Quality Standards

The federal and state governments have established ambient air quality standards for the protection of public health. The United States Environmental Protection Agency (U.S. EPA) is the federal agency designated to administer air quality regulation, while the California Air Resources Board (CARB) is the state equivalent in the California Environmental Protection Agency (CalEPA). The Air District provides local management of air quality in the city of Mountain View. CARB has established air quality standards and is responsible for the control of mobile emission sources, while the Air District is responsible for enforcing standards and regulating stationary sources.

The USEPA has set primary National Ambient Air Quality Standards (NAAQS) for ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter with an aerodynamic diameter equal to or less than 10 microns (PM_{10}), fine particulate matter with an aerodynamic diameter equal to or less than 2.5 microns ($PM_{2.5}$), and lead. Primary standards are those levels of air quality deemed necessary, with an adequate margin of safety, to protect public health. In addition, the State of California (State) has established health-based ambient air quality standards (CAAQS) for these and other pollutants, some of which are more stringent than the federal standards. Table 4.2-1 lists the current federal and State standards for regulated pollutants.

Table 4.2-1 Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards		National Standards	
		Concentration	Attainment Status	Concentration	Attainment Status
Ozone	8 Hour	0.070 ppm	N	0.070 ppm	N
	1 Hour	0.09 ppm	N		
Carbon Monoxide	8 Hour	9.0 ppm	A	9 ppm	A
	1 Hour	20 ppm	A	35 ppm	A
Nitrogen Dioxide	1 Hour	0.18 ppm	A	0.100 ppm	U
	Annual Arithmetic Mean	0.030 ppm		0.053 ppm	A
Sulfur Dioxide	24 Hour	0.04 ppm	A	0.14 ppm	A
	1 Hour	0.25 ppm	A	0.075 ppm	A
	Annual Arithmetic Mean			0.030 ppm	A
Particulate Matter (PM_{10})	Annual Arithmetic Mean	20 µg/m^3	N		
	24 Hour	50 µg/m^3	N	150 µg/m^3	U
Particulate Matter – Fine ($PM_{2.5}$)	Annual Arithmetic Mean	12 µg/m^3	N	9 µg/m^3	U/A
	24 Hour			35 µg/m^3	N
Sulfates	24 Hour	25 µg/m^3	A		
Lead	Calendar Quarter			1.5 µg/m^3	A
	Rolling 3 Month Average			0.15 µg/m^3	
	30 Day Average	1.5 µg/m^3			A
Hydrogen Sulfide	1 Hour	0.03 ppm	U		
Vinyl Chloride (chloroethene)	24 Hour	0.010 ppm	No information available		
Visibility Reducing particles	8 Hour (10:00 to 18:00 PST)		U		

A=Attainment N=Nonattainment U=Unclassified; mg/m^3=milligrams per cubic meter ppm=parts per million; µg/m^3=micrograms per cubic meter

Source: Bay Area Air District 2023a, http://www.baaqmd.gov/research-and-data/air-quality-standards-and-attainment-status

As a local air quality management agency, the Air District must monitor air pollutant levels to ensure that State and federal air quality standards are met and, if they are not met, to develop strategies to meet them. Depending on whether standards are met or exceeded, a local air basin is classified as in "attainment" or "non-attainment." The SFBAAB is designated non-attainment for the federal standards for ozone and $PM_{2.5}$ and in non-attainment for the State standard for ozone, $PM_{2.5}$, and PM_{10}.

Air Quality Pollutants of Primary Concern

The federal and State Clean Air acts mandate the control and reduction of certain air pollutants. Under these laws, U.S. EPA and CARB have established ambient air quality standards for certain criteria pollutants. Ambient air pollutant concentrations are affected by the rates and distributions of corresponding air pollutant emissions, and by the climate and topographic influences discussed above. Proximity to major sources is the primary determinant of concentrations of non-reactive pollutants, such as CO and suspended particulate matter. Ambient CO levels usually follow the

spatial and temporal distributions of vehicular traffic. A discussion of each primary criterion pollutant is provided below.

Ozone

Ozone is produced by a photochemical reaction (i.e., triggered by sunlight) between NO_X and reactive organic gases (ROG).[1] NO_X is formed during the combustion of fuels, while ROG is formed during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, it mostly occurs in substantial concentrations between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors (U.S. EPA 2023).

Carbon Monoxide

CO is a localized pollutant found in high concentrations only near its source. The primary source of CO, a colorless, odorless, poisonous gas, is automobile traffic's incomplete combustion of petroleum fuels. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. Other sources of CO include the incomplete combustion of petroleum fuels at power plants, and fuel combustion from wood stoves and fireplaces during the winter. When CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease. These people already have a reduced ability to get oxygenated blood to their hearts in situations where they need more oxygen than usual. As a result, they are especially vulnerable to the effects of CO when exercising or under increased stress. In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain, also known as angina (U.S. EPA 2023).

Nitrogen Dioxide

NO_2 is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. Nitric oxide is the principal form of nitrogen oxide produced by combustion, but nitric oxide reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. Nitrogen dioxide is an acute irritant. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis may occur in young children at concentrations below 0.3 ppm. Nitrogen dioxide absorbs blue light and causes a reddish-brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM_{10} and acid rain (U.S. EPA 2023).

Suspended Particulate Matter

PM_{10} and $PM_{2.5}$ are comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. Both PM_{10} and $PM_{2.5}$ are emitted into the atmosphere as by-products of fuel combustion, including smoke from wildfires, and wind erosion of soil and unpaved roads. The atmosphere, through chemical reactions, can form particulate matter. The characteristics, sources, and potential health effects of PM_{10} and $PM_{2.5}$ can be very different. PM_{10} is generally associated with dust mobilized by wind and vehicles. In contrast, $PM_{2.5}$ is generally associated with combustion processes

[1] CARB defines VOC and ROG similarly as, "any compound of carbon excluding CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions (CARB 2025c). For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions and the term ROG is used in this report.

and formation in the atmosphere as a secondary pollutant through chemical reactions. PM_{10} can cause increased respiratory disease, lung damage, cancer, premature death, reduced visibility, and surface soiling. For $PM_{2.5}$, short-term exposures (up to 24 hours duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases (CARB 2025a).

Lead

Lead (Pb) is a metal found naturally in the environment, as well as in manufacturing products. The major sources of lead emissions historically have been mobile and industrial. However, due to the U.S. EPA's regulatory efforts to remove lead from gasoline, atmospheric lead concentrations have declined substantially over the past several decades. The most dramatic reductions in lead emissions occurred before 1990 due to the removal of lead from gasoline sold for most highway vehicles. Lead emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries at least partly due to national emissions standards for hazardous air pollutants (U.S. EPA 2014). As a result of phasing out leaded gasoline, metal processing is currently the primary source of lead emissions. The highest lead level in the air is generally found near lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. Lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, mental functioning, and cardiovascular system, depending on exposure. Lead exposure also affects the oxygen-carrying capacity of blood. The lead effects most likely encountered in current populations are neurological in children. Infants and young children are susceptible to lead exposures, contributing to behavioral problems, learning deficits, and lowered intelligence quotient (U.S. EPA 2025).

Toxic Air Contaminants

The California Health and Safety Code defines a toxic air contaminant (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." Most of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being diesel particulate matter (DPM) from diesel-fueled engines. According to CARB, diesel engine emissions are believed to be responsible for about 70 percent of California's estimated known cancer risk attributable to TACs and they make up about 8 percent of outdoor $PM_{2.5}$ (CARB 2025a).

Current Air Quality

CARB and the U.S. EPA established ambient air quality standards for major pollutants, including ozone, CO, NO_2, SO_2, Pb, and PM_{10} and $PM_{2.5}$. Standards have been set at levels intended to be protective of public health. California standards are more restrictive than federal standards for each of these pollutants except for lead and the eight-hour average for CO. The local Air Pollution Control Districts are required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards.

The city of Mountain View is located within the SFBAAB under the jurisdiction of the Air District. As the local air quality management agency, the Air District is required to monitor air pollutant levels to ensure that State and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

The closest air quality monitoring station to Mountain View is the San José – Jackson Street station at 158B Jackson Street, approximately 10 miles east of the city of Mountain View. The San José – Jackson Street station monitors ozone, NO_2, $PM_{2.5}$, and PM_{10}. Table 4.2-2 indicates the number of days that each of the air quality standards have been exceeded at the stations during the monitoring period from 2021 through 2023. Levels of 8-hour ozone exceeded both federal and State thresholds in 2021 and 2022. Levels of 1-hour ozone exceeded State thresholds in 2021. $PM_{2.5}$ exceeded federal thresholds in all three reported years. No other thresholds were exceeded in the years 2021 through 2023.

Table 4.2-2 Ambient Air Quality at Nearest Monitoring Stations

Pollutant	2021	2022	2023
San José – Jackson Street Station			
8-Hour Ozone (ppm), maximum	0.084	0.074	0.068
Number of days of state exceedances (>0.070 ppm)	4	1	0
Number of days of federal exceedances (>0.070 ppm)	4	1	0
1-hour Ozone (ppm), maximum	0.098	0.090	0.087
Number of days of state exceedances (>0.09 ppm)	3	0	0
Number of days of federal exceedances (>0.112 ppm)	0	0	0
Nitrogen dioxide (ppb), 1-hour maximum	48.7	46.8	58.7
Number of days of state exceedances (>180 ppb)	0	0	0
Number of days of federal exceedances (>100 ppb)	0	0	0
Particulate matter <2.5 microns, μg/m³, 24-hour maximum	38.1	36.2	49.0
Number of days above federal standard (>35 μg/m³)	1	2	1
Particulate matter <10 microns, μg/m³, 24-hour maximum	42.8	41.1	*
Number of days of state exceedances (>50 μg/m³)	0	0	*
Number of days of federal exceedances (>150 μg/m³)	0	0	*

ppm = parts per million; ppb = parts per billion; μg/m³ = micrograms per cubic meter; * = insufficient data to determine the value
Source: CARB 2025c

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient to protect public health and welfare, with a margin of safety. They are designed to protect that segment of the public most susceptible to the effects of air pollutants and subsequent respiratory distress, such as children under 14, the elderly over 65, persons engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases. Accordingly, examples of sensitive receptors for air quality include hospitals, schools, convalescent facilities, and residential areas. The proposed amendments to the City's Zoning Code would be implemented throughout the city, primarily in residential areas. Therefore, sensitive receptors exist throughout the Project area.

4.2.2 Regulatory Setting

a. Federal Regulations

Federal Clean Air Act

The U.S. EPA is charged with implementing national air quality programs. U.S. EPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), passed in 1963 by the U.S. Congress and amended several times. The 1970 federal CAA amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including non-attainment requirements for areas not meeting NAAQS and the Prevention of Significant Deterioration program. The 1990 federal CAA amendments represent the latest in a series of federal efforts to regulate air quality in the United States.

National Ambient Air Quality Standards

The federal CAA requires U.S. EPA to establish primary and secondary NAAQS for several criteria air pollutants. The air pollutants for which standards have been established are considered the most prevalent air pollutants known to be hazardous to human health. NAAQS have been established for ozone, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and Pb.

b. State Regulations

California Clean Air Act

The California CAA, signed into law in 1988, requires all areas of the State to achieve and maintain the CAAQS by the earliest practical date. CARB is the State air pollution control agency and is a part of CalEPA. CARB is the agency responsible for coordination and oversight of State and local air pollution control programs in California, and for implementing the requirements of the California CAA. CARB overseas local district compliance with federal and California laws, approves local air quality plans, submits the State implementation plans to the U.S. EPA, monitors air quality, determines and updates area designations and maps, and sets emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

California Ambient Air Quality Standards

The California CAA requires CARB to establish ambient air quality standards for California, known as CAAQS. Similar to the NAAQS, CAAQS have been established for criteria pollutants and standards are established for vinyl chloride, hydrogen sulfide, sulfates, and visibility-reducing particulates. In general, the CAAQS are more stringent than the NAAQS on criteria pollutants. The California CAA requires all local air districts to endeavor to achieve and maintain the CAAQS by the earliest practical date. The California CAA specifies that local air districts focus attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.

CARB released a technical advisory on reducing air pollution near high-volume roadways to clarify the 500-foot recommendation from 2005 due to the increased focus on and benefits from infill development, which can often occur within 500 feet of a major roadway (CARB 2017). As described in the technical advisory, California has implemented various measures to improve air quality and

reduce exposure to traffic emissions. These include the Diesel Risk Reduction Plan, which aims to reduce particulate matter emissions from diesel vehicles. The continued electrification of California's vehicle fleet would also reduce $PM_{2.5}$ levels, and ongoing efforts to reduce emissions from cars and trucks and to move vehicles towards "zero emission" alternatives will continue to drive down traffic pollution (CARB 2017).

c. Regional and Local Regulations

Bay Area Air Quality Management District

The Air District is the agency primarily responsible for assuring national and State ambient air quality standards are attained and maintained in the SFBAAB. The Air District is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, and conducting public education campaigns, as well as many other activities. The Air District has jurisdiction over much of the nine-county Bay Area, including the City of Mountain View.

The Air District adopted the 2017 Clean Air Plan as an update to the 2010 Clean Air Plan. The 2017 Clean Air Plan provides a regional strategy to protect public health and protect the climate, which would apply to proposed projects in the SFBAAB. To fulfill State ozone planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of ozone precursors—ROG and NO_X—and reduce transport of ozone and its precursors to neighboring air basins, such as: stationary-source control measures to be implemented through the Air District regulations; mobile-source control measures to be implemented through incentive programs and other activities; and transportation control measures to be implemented through transportation programs in cooperation with the Metropolitan Transportation Commission (MTC), local governments, transit agencies, and others. In addition, the 2017 Clean Air Plan builds upon and enhances the Air District's efforts to reduce emissions of fine particulate matter and toxic air contaminants. The 2017 Clean Air Plan also represents the Bay Area's most recent triennial assessment of the Region's strategy to attain the State 1-hour ozone standard (Bay Area Air District 2017).

City of Mountain View 2030 General Plan

The Mountain View 2030 General Plan is the guiding document for the City's physical development and preservation. It includes goals, policies and graphics that convey a long-term vision and guide local decision-making to achieve that vision. Air quality goals and policies are contained in the Land Use and Design; Mobility; and Infrastructure and Conservation elements of the General Plan. The following list includes relevant goals and policies in these elements (City of Mountain View 2012).

Goal LUD 10: High-quality, sustainable and healthful building design and development.

> **Policy LUD 10.5: Building energy efficiency.** Incorporate energy-efficient design features and materials into new and remodeled buildings.
>
> **Policy LUD 10.9: Sustainable roofs.** Encourage sustainable roofs to reduce a building's energy use, reduce the heat island effect of new and existing development and provide other ecological benefits.

Goal MOB 9: Achievement of state and regional air quality and greenhouse gas emission reduction targets.

Policy MOB 9.1: Greenhouse gas emissions. Develop cost-effective strategies for reducing greenhouse gas emissions in coordination with the Greenhouse Gas Reduction Program.

Policy MOB 9.2: Reduced vehicle miles traveled. Support development and transportation improvements that help reduce greenhouse gas emissions by reducing per capita vehicle miles traveled.

Policy MOB 9.3: Low-emission vehicles. Promote use of fuel-efficient, alternative fuel and low-emission vehicles.

Goal INC 20: Clean, breathable air and strongly controlled city sources of air pollution.

Policy INC 20.1: Pollution prevention. Discourage mobile and stationary sources of air pollution.

Policy INC 20.2: Collaboration. Participate in state and regional planning efforts to improve air quality.

Policy INC 20.3: Pollution-reduction technologies. Encourage the use of non-fossil fuels and other pollution-reduction technologies in transportation, machinery and industrial processes.

Policy INC 20.4: Freight routes. Identify and maintain primary freight routes that provide direct access to industrial and commercial areas.

Policy INC 20.5: Truck access. Plan industrial and commercial development to avoid truck access through residential areas, and minimize truck travel on streets designated primarily for residential access by the General Plan.

Policy INC 20.6: Air quality standards. Protect the public and construction workers from construction exhaust and particulate emissions.

Policy INC 20.7: Protect sensitive receptors. Protect the public from substantial pollutant concentrations.

Policy INC 20.8: Offensive odors. Protect residents from offensive odors.

Mountain View Standard Conditions of Approval

The City has standard conditions that are applied as part of discretionary review for different types of approvals. The City's standard conditions relating to air quality are summarized below.

Air Quality

The applicant is required to secure a permit from the Bay Area Air Quality Management District or provide written assurance that no permit is required prior to issuance of a building permit.

Basic Air Quality Construction Measures

The applicant shall require all construction contractors to implement the basic construction mitigation measures recommended by the Bay Area Air District (Air District) to reduce fugitive dust emissions. Emission reduction measures will include, at a minimum, the following measures: (a) all exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) will be watered two times per day; (b) all haul trucks transporting soil, sand, or other loose material off-site will be covered; (c) all visible mud or dirt track-out onto adjacent public roads will

be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited; (d) all vehicle speeds on unpaved roads will be limited to 15 mph; (e) all roadways, driveways, and sidewalks to be paved will be completed as soon as possible. Building pads will be laid as soon as possible after grading unless seeding or soil binders are used; (f) 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; (g) 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; and (h) post a publicly visible sign with the telephone number and person to contact at the City of Mountain View regarding dust complaints. This person will respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. Additional measures could also be required.

4.2.3 Impact Analysis

Methodology and Thresholds of Significance

Significance Thresholds

To determine whether a project would result in a significant impact to Air Quality, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

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

BAY AREA AIR DISTRICT (AIR DISTRICT) SIGNIFICANCE THRESHOLDS

This analysis uses the Bay Area Air District's 2022 *CEQA Air Quality Guidelines* to evaluate air quality. The plan-level thresholds specified in the 2022 Bay Area Air District *CEQA Air Quality Guidelines* were used to determine whether the Proposed Project impacts exceed the thresholds identified in *CEQA Guidelines* Appendix G.

CONSISTENCY WITH AIR QUALITY PLAN

Under the Air District's methodology, a determination of consistency with *CEQA Guidelines* thresholds should demonstrate that a project:

1. Supports the primary goals of the 2017 Clean Air Plan.
2. Includes applicable control measures from the 2017 Clean Air Plan.
3. Does not disrupt or hinder implementation of any 2017 Clean Air Plan control measures.

CRITERIA AIR POLLUTANTS - CONSTRUCTION

The Air District's 2022 *CEQA Air Quality Guidelines* have no plan-level significance thresholds for construction air pollutants emissions. However, they do include project-level screening and emissions thresholds for temporary construction-related emissions of air pollutants. These thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAAB's existing air quality conditions and are discussed in detail below (Air District 2023b). Construction emissions associated with plan implementation are discussed qualitatively to evaluate potential air quality impacts since the Proposed Project does not propose specific development projects and therefore individual project-specific information is currently not available.

The Air District developed screening criteria in the 2022 CEQA Air Quality Guidelines to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant air quality impacts. The screening criteria for residential land uses are shown in Table 4.2-3.

Table 4.2-3 Air District Criteria Air Pollutant Screening Levels

Land Use Type	Operational Criteria Pollutant Screening Size (du)	Construction Criteria Pollutant Screening Size (du)
Single Family Housing	421	254
Apartments	638	416
Condo-Townhouse	637	416
Mobile Home Park	721	377
Congregate Care/Retirement Community	1,008	416

du = dwelling unit; NOX = oxides of nitrogen; ROG = reactive organic gases

Source: Bay Area Air District 2022

In addition to the screening levels above, several additional factors are outlined in the 2022 CEQA Air Quality Guidelines that construction activities must satisfy for a project to meet the construction screening criteria:

- All best management practices from the 2022 *CEQA Guidelines* must be included in project design and implemented during construction,
- Construction-related activities would not overlap with operational activities,
- Construction-related activities would not include any of the following:
  - Demolition,
  - Simultaneous occurrence of more than two construction phases (e.g., paving and building construction occurring simultaneously),
  - Extensive site preparation (e.g., grading, cut and fill, or earth movement),
  - Extensive material transport (e.g., soil import and export requiring a considerable amount of haul truck activity), or
  - Stationary sources (e.g., backup generators) subject to the Air District rules and regulations.

If a project meets the screening criteria, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. These screening

levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration (Air District 2023b).

For projects that do not meet the screening criteria above, the Air District construction significance thresholds for criteria air pollutants, shown in Table 4.2-4, are used to evaluate a project's potential air quality impacts.

Table 4.2-4 Air District Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds Average Daily Emissions (lbs/day)	Operational Threshold Average Daily Emissions (lbs/day)	Operational Threshold Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO_X	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
Fugitive Dust	Best Management Practices	Not Applicable	Not Applicable

lbs = pounds; NO_X = oxides of nitrogen; ROG = reactive organic gases; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns

Source: Bay Area Air District 2023b

For all projects in the SFBAAB, the Air District 2022 CEQA Air Quality Guidelines recommends implementation of the Basic Best Management Practices for Construction-Related Fugitive Dust Emissions listed in Table 5-2 of the Guidelines (Air District 2023b). For projects that exceed the thresholds in Table 4.2-4, the Air District 2022 CEQA Air Quality Guidelines recommends implementation of the Additional Construction Mitigation Measures listed in Table 8-3 of the Guidelines (Air District 2023b).

Criteria Air Pollutants – Operation

The Bay Area Air District's 2022 CEQA Air Quality Guidelines contain specific operational plan-level significance thresholds for criteria air pollutants. Plans must show the following over the planning period:

- Consistency with current air quality plan control measures, and
- Vehicle miles traveled (VMT) or vehicle trips increase is less than or equal to the plan's projected population increase.

If a plan can demonstrate consistency with both criteria, then impacts would be less than significant. The current air quality plan is the 2017 Clean Air Plan.

For project-level thresholds, the screening criteria for operational emissions are shown in Table 4.2-3. For projects that do not meet the screening criteria, the Air District operational significance thresholds for criteria air pollutants, shown in Table 4.2-4, are used to evaluate a project's potential air quality impacts.

Carbon Monoxide Hotspots

The Air District provides a preliminary screening methodology to conservatively determine whether a proposed project would exceed CO thresholds. If the following criteria are met, the individual project would result in a less than significant impact related to local CO concentrations:

1. The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans;
2. Project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; and
3. Project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

TOXIC AIR CONTAMINANTS

For health risks associated with TAC and $PM_{2.5}$ emissions, the Air District 2022 CEQA Air Quality Guidelines state a project would result in a significant impact if the any of the following thresholds are exceeded (Air District 2023b):

- Non-compliance with Qualified Community Risk Reduction Plan;
- Increased cancer risk of > 10.0 in a million;
- Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute); or
- Ambient $PM_{2.5}$ increase of > 0.3 $\mu g/m^3$ annual average

LEAD

Projects would be required to comply with Air District Regulation 11, Rule 1 (Lead), which is intended to control the emission of lead to the atmosphere. This rule sets standards and limits for emissions of lead and provides procedures for monitoring emissions.

ASBESTOS

Demolition of buildings would be subject to Air District Regulation 11, Rule 2 (Asbestos Demolition, Renovation, and Manufacturing). Air District Regulation 11, Rule 2 is intended to limit asbestos emissions from demolition and the associated disturbance of asbestos-containing waste material generated or handled during these activities. This rule requires notification of the Air District of any regulated demolition activity, and contains specific requirements for surveying, notification, removal, and disposal of material containing asbestos. Impacts related to asbestos emissions from projects that comply with Regulation 11, Rule 2 are considered to be less than significant since the regulation would ensure the proper and safe disposal of asbestos containing material.

ODORS

The Air District provides minimum distances for siting of new odor sources, shown in Table 4.2-5. A significant impact would occur if the project would result in other emissions (such as odors) affecting substantial numbers of people or would site a new odor source as shown in Table 4.2-5 within the specified distances of existing receptors.

Table 4.2-5 Air District Odor Source Thresholds

Odor Source	Minimum Distance for Less than Significant Odor Impacts (in miles)
Wastewater Treatment Plant	2
Wastewater Pumping Facilities	1
Sanitary Landfill	2
Transfer Station	1
Composting Facility	1
Petroleum Refinery	2
Asphalt Batch Plant	2
Chemical Manufacturing	2
Fiberglass Manufacturing	1
Painting/Coating Operations	1
Rendering Plant	2
Coffee Roaster	1
Food Processing Facility	1
Confined Animal Facility/Feed Lot/Dairy	1
Green Waste and Recycling Operations	1
Metal Smelting Plants	2

Source: Bay Area Air District 2023b

Methodology

Because the R3 Zoning District Update is programmatic in nature, health impacts associated with potential air quality changes as a result of this Project cannot be directly linked to Mountain View residents at this stage. Future development under the Project would occur on dispersed sites throughout the city. As such, localized air quality impacts and associated health risks would likely affect only a subset of residents rather than the entire community. Accordingly, the following methodology focuses on evaluating air quality impacts at a plan level, using qualitative analysis for construction and operational emissions consistent with the Air District's guidance.

CONSTRUCTION EMISSIONS

Construction-related emissions are temporary but may still cause adverse air quality impacts. Construction of development associated with the Proposed Project would generate temporary emissions from three primary sources: the operation of construction vehicles (e.g., scrapers, loaders, dump trucks, concrete mixers, delivery trucks, etc.); ground disturbance during site preparation and grading, which creates fugitive dust; and the application of asphalt, paint, or other oil-based substances.

At this time, there is not sufficient detail to allow project-level analysis and thus it would be speculative to analyze project-level impacts. A detailed analysis of project-level impacts would require knowledge of the precise construction durations, intensity of construction activities, and proximity to other developments facilitated by the Project. Accordingly, construction impacts for the Proposed Project are discussed qualitatively and emissions are not compared to the project-level thresholds.

OPERATION EMISSIONS

Stationary and mobile sources generate air pollutant emissions in the basin. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and are generated by residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products, among other things. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

Based on plan-level guidance from the Bay Area Air District 2022 CEQA Air Quality Guidelines, long-term operational emissions associated with implementation of the Proposed Project are discussed qualitatively by comparing the Proposed Project to the 2017 Clean Air Plan goals, policies, and control measures. In addition, comparing the rate of increase of plan VMT and population is recommended by the Air District for determining significance of criteria pollutants. If the Proposed Project does not meet either criterion, then impacts would be potentially significant.

As discussed in Section 4.13, *Transportation*, the VMT analysis follows the qualitative approach approved by the City of Mountain View, using descriptive evidence, regional trends, and peer-reviewed research in place of a quantitative travel model. The qualitative method was selected due to the scale and uncertainty of the zoning update— particularly the dispersed nature of future development and the lack of parcel-specific data.

Project Impacts and Mitigation Measures

Threshold 1:	Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1 THE PROPOSED PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE 2017 CLEAN AIR PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Project Consistency with the Current Air Quality Plan

As stated above under "Significance Thresholds," according to the Air District, a project is consistent with the Clean Air Plan if it:

1. Supports the primary goals of the 2017 Clean Air Plan.
2. Includes applicable control measures from the 2017 Clean Air Plan.
3. Does not disrupt or hinder implementation of any 2017 Clean Air Plan control measures.

The 2017 Clean Air Plan focuses on two goals: protecting public health and protecting the climate.

Consistent with the Project's objective to support increased housing capacity, the Project would increase the total buildout potential of the identified R2 and R3 Rezoning Sites, thus providing areas for the development of new housing projects consistent with the proposed new zoning designation of these sites. As discussed in Chapter 2, *Project Description*, the Project could accommodate an

estimated net increase of up to 32,000 residents and 16,000 new dwelling units in the Project area, which includes R3-zoned parcels and select R2-zoned parcels throughout the city.

The R3 Rezoning identifies fourteen Change Area sites spanning 8,350 parcels, with an emphasis on proximity to transit, commercial and employment centers, and ability to accommodate parks or open space. The Project would encourage denser housing on sites near corridors served by public transit, such as those along East Evelyn Avenue, State Route 82, and West Middlefield Road. Specifically, Change Area sites 1 and 2 would be located in proximity to Valley Transportation Authority (VTA) bus routes 22 and 40; sites 5, 6, and 7 would be located in proximity to VTA Gray and Red bus routes; and sites 4, 5, 11, and 12 would be located in proximity to the VTA Orange Line light rail route. Bicycle facilities are located throughout the Project area, including Class II and Class III bike routes on Shoreline Boulevard, California Street, and Montecito Avenue. By allowing for denser residential uses near bicycle facilities, bus routes, and light rail stops, the Proposed Project would facilitate the use of alternative modes of transportation to services and job centers, thereby reducing the use of personal vehicles and subsequent mobile emissions than if R3 Zoning District Update sites were placed farther from corridors served by transit. This would support the 2017 Clean Air Plan's goal of protecting the climate.

Development facilitated by the Project would be required to comply with the latest Title 24 regulations, including requirements for residential indoor air quality. The analysis is based on compliance with 2022 Title 24 requirements although individual projects developed under the Proposed Project would be required to comply with the most current version of Title 24 at the time of project construction. These requirements currently mandate Minimum Efficiency Reporting Value (MERV) 13 (or equivalent) filters for heating/cooling systems and ventilation systems in residences (Section 150.0[m]) or implementation of future standards that would be anticipated to be equal to or more stringent than current standards. Therefore, the Project would improve air quality compared to development farther from transit and services through reducing VMT and would protect public health through requirements for MERV-13 filters or equivalent indoor air quality measures that are less common in existing housing stock, which would be consistent with the primary goals of the 2017 Clean Air Plan to protect public health.

The 2017 Clean Air Plan includes 85 control measures under the following sectors: stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Many of these measures are industry-specific and would not be applicable to development facilitated by the Project (e.g., certain types of stationary sources, agriculture, and natural and working lands). Measures related to transportation, energy, building, water, waste, and super-GHG pollutants sectors are focused on larger-scale planning efforts (e.g., transit funding, utility energy procurement, regional energy plans) and would not directly apply to development facilitated by the Project. Table 4.2-6 discusses Project consistency with applicable control measures from the 2017 Plan.

Table 4.2-6 Project Consistency with Applicable 2017 Plan Control Measures

Control Measures	Consistency
Stationary Sources	
SS18: Basin-Wide Combustion Strategy. Stabilize and then reduce emissions of GHGs, criteria air pollutant and toxic emissions from stationary combustion sources throughout the Air District by first establishing carbon intensity caps on major GHG sources, and then adopting new rules to (1) reduce fuel use on a source-type by source-type basis, and (2) evaluate alternatives to decarbonize abatement devices.	**Consistent**: Stationary sources are regulated directly by the Air District, which routinely adopts and revises rules or regulations to implement the Stationary Source control measures to reduce stationary source emissions. New stationary sources associated with the Project would be required to comply with the Air District's regulations and would therefore be consistent with these control measures.
SS21: New Source Review for Air Toxics. Propose revisions to Air District Rule 2-5, New Source Review of Toxic Air Contaminants, based on OEHHA's 2015 Health Risk Assessment Guidelines and CARB/ CAPCOA's 2015 Risk Management Guidance. Revise the Air District's health risk assessment trigger levels for each toxic air contaminant using the 2015 Guidelines and most recent health effects values.	
Transportation	
TR9: Bicycle and Pedestrian Access and Facilities. Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.	**Consistent**: The Proposed Project itself does not include bicycle or pedestrian improvements but also would not include Project components that would conflict with bicycle or pedestrian access or facilities. The Proposed Project would facilitate housing development on infill sites and on sites in proximity to corridors served by Class II and Class III bicycle lanes and bus stops, such as East Evelyn Avenue, State Route 82, and West Middlefield Road. The Proposed Project would increase housing in areas served by pedestrian and bicycle facilities and within walking and biking distance to bus stops to facilitate the use of alternative modes of transportation. Implementation of the City's Active Transportation Plan would involve the development of more Class II, III, and IV bicycle lanes, which future residents from the Proposed Project would be able to utilize (City of Mountain View 2015). Therefore, the Project would be consistent with this control measure.
Buildings	
BL1: Green Buildings. Collaborate with partners such as KyotoUSA to identify energy-related improvements and opportunities for on-site renewable energy systems in school districts; investigate funding strategies to implement upgrades. Identify barriers to effective local implementation of the CALGreen (Title 24) statewide building energy code; develop solutions to improve implementation/enforcement. Work with ABAG's BayREN program to make additional funding available for energy-related projects in the buildings sector. Engage with additional partners to target reducing emissions from specific types of buildings.	**Consistent**: Future development facilitated by the Proposed Project would be required to comply with the energy and sustainability standards of Title 24 (including the California Energy Code and CALGreen) and the City's associated amendments that are in effect at that time. The Title 24 standards are updated every three years and become increasingly more stringent over time. Future development would also be required to comply with Policy LUD-10.5 of the 2030 General Plan, which encourages energy efficient design features, and Policy LUD 10.9 of the 2030 General Plan which encourages sustainable roofs to reduce building energy usage. Therefore, the Project would be consistent with this control measure.

Control Measures	Consistency
Waste Management Control Measures	
WA4: Recycling and Waste Reduction. Develop or identify and promote model ordinances on community-wide zero waste goals and recycling of construction and demolition materials in commercial and public construction projects	**Consistent.** Measure WA4 includes strategies to increase waste diversion rates through efforts to reduce, reuse, and recycle. Development under the Project would comply with AB 341, which requires mandatory commercial recycling for businesses that generate four cubic yards or more of commercial solid waste per week. For further discussion of waste diversion, please refer to Section 4.18, *Utilities and Service Systems.*

Source: Bay Area Air District 2017

As shown in Table 4.2-6, the Project would be consistent with the applicable measures as development facilitated by the Project would increase housing in areas served by pedestrian and bicycle facilities, adhere to sustainability policies set forth in the 2030 General Plan, and would be required to comply with the latest Title 24 regulations. Development facilitated by the Project would not contain elements that would disrupt or hinder implementation of 2017 Clean Air Plan control measures. Therefore, the Project would be generally consistent with the 2017 Clean Air Plan.

Mitigation Measures

This impact would be less than significant without mitigation. Mitigation would not be required.

Threshold 2: 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?

Impact AQ-2 CONSTRUCTION FACILITATED BY THE PROPOSED PROJECT WOULD TEMPORARILY INCREASE AIR POLLUTANT EMISSIONS, WHICH WOULD AFFECT LOCAL AIR QUALITY. IMPLEMENTATION OF MITIGATION MEASURE AQ-1 WOULD REDUCE CONSTRUCTION EMISSIONS TO A LESS THAN SIGNIFICANT LEVEL. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

As discussed in Section 4.2.2, *Regulatory Setting,* the SFBAAB is designated nonattainment for the federal standards for ozone and $PM_{2.5}$ and in nonattainment for the state standard for ozone, $PM_{2.5}$, and PM_{10}. The SFBAAB is designated unclassifiable or in attainment for all other federal and state standards.

Future construction facilitated by the Proposed Project would involve activities that result in air pollutant emissions. Such activities include demolition, grading, construction worker travel, delivery and hauling of construction supplies and debris, and fuel combustion by on-site construction equipment. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. The extent of daily emissions, particularly ozone precursor (ROG and NO_X) emissions, generated by construction equipment, would depend on the quantity of equipment used and the hours of operation for each project. The extent of $PM_{2.5}$ and PM_{10} emissions would depend upon the following factors: 1) the amount of disturbed soils; 2) the length of disturbance time; 3) whether existing structures are demolished; 4) whether excavation is involved; and 5) whether transporting excavated materials offsite is necessary. Dust emissions can lead to both nuisance and health impacts. According to the Bay Area Air District 2022 *CEQA Air Quality Guidelines,* PM_{10} is the greatest pollutant of concern during construction (Bay Area Air District 2023b).

As discussed above under Section 4.2.1a, Bay Area Air District's 2022 CEQA Air Quality Guidelines have no plan-level significance thresholds for construction air pollutant emissions that would apply to the Project. However, the guidelines include project-level thresholds for construction emissions. If an individual project's construction emissions fall below the project-level thresholds, the Project's impacts on regional air quality would be individually and cumulatively less than significant. The Air District has also identified feasible fugitive dust control measures for construction activities. For a project to have a less-than-significant criteria air pollutant impact related to construction-related fugitive dust emission , these *Basic Best Management Practices for Construction-Related Fugitive Dust Emission*s must be implemented (Table 5-2 of the 2022 Bay Area Air District CEQA Air Quality Guidelines) (Bay Area Air District 2023b). Construction activities allowed under the Project would be required to implement these fugitive dust control measures. In addition, the Air District and CARB have regulations that address the handling of hazardous air pollutants such as lead and asbestos, which could be aerially disbursed during demolition activities. Future development facilitated by the R3 Zoning District Update would be required to comply with policies in the City's 2030 General Plan, specifically Policy INC 20.7, which is aimed at protecting the public and construction workers from construction exhaust and particulate emissions and Policy INC 20.5, which discourages truck access through residential areas. Additionally, new development would be required to comply with all applicable Air District dust control measures for new construction. Nonetheless, construction of development envisioned under the Project would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution concentrations or air quality nuisances. Because construction activities for future individual projects are currently unknown, even with adherence to the 2030 General Plan policies and compliance with the Air District's Basic Best Management Practices for Construction-Related Fugitive Dust Emissions, construction activities from the Proposed Project could still potentially result in a cumulatively considerable net increase of criteria pollutants. Accordingly, individual projects would be required to comply with Mitigation Measure AQ-1.

Mitigation Measures

The Proposed Project would be subject to Mitigation Measure AQ-1, described below. This measure requires a quantitative analysis of individual projects exceeding the Air District's screening criteria for criteria pollutant emissions and specifies emission reduction measures that shall be implemented if significance thresholds for criteria pollutants are exceeded.

AQ-1 Emission Reduction Measures for Projects Exceeding the Significance Thresholds for Criteria Pollutants

Project applicants proposing projects that exceed the Air District screening levels shall prepare a project-level criteria air pollutant assessment of construction and operational emissions at the time the project is proposed. The project-level assessment shall either include a comparison of the project with other similar projects where a quantitative analysis has been conducted, or shall provide a project-specific criteria air pollutant analysis to determine whether the project exceeds the Air District's criteria air pollutant thresholds.

In the event that a project-specific analysis finds that the project could result in criteria air pollutant emissions that exceed the Air District's significance thresholds, the project applicant shall implement the following emission reduction measures to the degree necessary to reduce the impact to less than the significance thresholds, and shall implement additional feasible measures if necessary to reduce the impact to less than the significance thresholds.

1. The project applicant shall use electric construction equipment when feasible.
2. The project applicant shall ensure that all diesel off-road equipment shall have engines that meet the Tier 4 Final off-road emission standards, as certified by CARB, except as provided for in this section. This requirement shall be verified through submittal of an equipment inventory that includes the following information: (1) Type of Equipment, (2) Engine Year and Age, (3) Number of Years Since Rebuild of Engine (if applicable), (4) Type of Fuel Used, (5) Engine HP, (6) Verified Diesel Emission Control Strategy (VDECS) information if applicable and other related equipment data. A Certification Statement is also required to be made by the Contractor for documentation of compliance and for future review by the BAAQMD as necessary. The Certification Statement must state that the Contractor agrees to compliance and acknowledges that a violation of this requirement shall constitute a material breach of contract.

   The City may waive the requirement for Tier 4 Final equipment only under the following unusual circumstances: if a particular piece of off-road equipment with Tier 4 Final standards is technically not feasible or not commercially available; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or there is a compelling emergency need to use other alternate off-road equipment. For purposes of this mitigation measure, "commercially available" shall mean the availability of Tier 4 Final engines similar to the availability for other large-scale construction projects in the region occurring at the same time and taking into consideration factors such as (i) potential significant delays to critical-path timing of construction for the project and (ii) geographic proximity to the project site of Tier 4 Final equipment.
3. The project applicant shall require that the idling time for off-road and on-road equipment be limited to no more than 2 minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the 2-minute idling limit.

Significance after Mitigation

Implementation of Mitigation Measure AQ-1 would require individual air quality analyses that would identify emission-reduction measures to reduce temporary construction impacts. Implementation of this mitigation measure would ensure that the Proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard. This impact would be less than significant with mitigation.

Impact AQ-3 THE PROJECT WOULD FACILITATE HIGHER-DENSITY DEVELOPMENT AND MORE EFFICIENT TRAVEL PATTERNS, RESULTING IN LOWER VEHICLE MILES TRAVELED AND REDUCED OPERATIONAL EMISSIONS OF CRITERIA POLLUTANTS. THEREFORE, THE PROJECT'S OPERATIONAL AIR QUALITY IMPACTS WOULD BE LESS THAN SIGNIFICANT.

According to the Bay Area Air District 2022 CEQA Air Quality Guidelines, the threshold for criteria air pollutants and precursors requires an assessment of consistency with current air quality plan control measures and demonstration that the rate of plan VMT increase is less than or equal to the plan's projected population increase. As demonstrated under Impact AQ-1, the Project would be consistent with the 2017 Clean Air Plan air quality plan control measures.

The project-specific Transportation Analysis prepared by Fehr and Peers (see Appendix C) employs a qualitative method for VMT analysis due to the scale and uncertainty of Project buildout, particularly with regard to the dispersed nature of future development and the lack of parcel-specific data. This approach drew from established research, city data, and policy context rather than a quantitative travel model. The Project would increase allowable residential densities in areas proximate to existing commercial and office areas. Based on the California Air Pollution Control Officers Association (CAPCOA) 2021 *Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity,* increases in development density reduces VMT generation in the area (Appendix C). The CAPCOA 2021 Handbook quantifies this relationship: the elasticity of VMT with respect to residential density is -0.22, meaning that a 1% increase in development density would reduce VMT by about 0.22%. In most cases, the rezoning is expected to yield higher units per acre, which typically lowers VMT per household compared with lower density patterns. Based on the increased allowable densities proposed as part of the Project, it is anticipated the Project could facilitate a citywide VMT reduction of approximately 30 percent (Appendix C). Accordingly, the Project is not anticipated to result in VMT generation that exceeds the plan's projected population increase. This impact would be less than significant.

Mitigation Measure

This impact would be less than significant. No mitigation measures are required.

Threshold 3:	Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-4 OPERATION OF THE PROPOSED PROJECT WOULD POTENTIALLY EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS FROM EXISTING SOURCES OF TACS. CONSTRUCTION ACTIVITIES FOR INDIVIDUAL PROJECTS FACILITATED BY THE PROPOSED PROJECT LASTING LONGER THAN TWO MONTHS OR LOCATED WITHIN 1,000 FEET OF SENSITIVE RECEPTORS COULD EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH IMPLEMENTATION OF MITIGATION MEASURES AQ-2 AND AQ-3.

Carbon Monoxide Hotspots

A CO hotspot is a localized concentration of CO that is above a CO ambient air quality standard. The entire Basin is in conformance with state and federal CO standards, as indicated by the recent air quality monitoring. There are no current exceedances of CO standards within the Air District and there has not been a CO exceedance in the Bay Area since before 1994.[2] For 2019, the Bay Area's reported maximum 1-hour and average daily concentrations of CO were 5.6 ppm and 1.7 ppm respectively (Bay Area Air District 2019).[3] These are well below the respective 1-hour and 8-hour standards of 20 ppm and 9 ppm. Given the ambient concentrations, which includes mobile as well as stationary sources, a project in the SFBAAB would need to emit concentrations three times the hourly maximum ambient emissions for all sources before project emissions would exceed the 1-hour standard. Additionally, the Project would need to emit seven times the daily average for ambient concentrations to exceed the 8-hour standards. Typical development projects, even plan level growth, would not emit the levels of CO necessary to result in a localized hot spot.

[2] The Air District only has records for annual air quality summaries dating back to 1994.
[3] Data for 2019 was used as the data from 2021 through 2023 are not currently available.

Toxic Air Contaminants

Construction

Construction-related activities would result in short-term emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation (e.g., excavation, grading, and clearing), building construction, and other miscellaneous activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM, as discussed below, outweighs the potential non-cancer[4] health impacts (CARB 2025b).

Generation of DPM from construction typically occurs in a single area for a short period. Construction of development facilitated by the Project would occur over approximately several decades but use of diesel-powered construction equipment in any one area would likely occur for no more than a few years for an individual project and would cease when construction is completed in that area. It is impossible to quantify risk without identified specific project details and locations.

The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period. According to the California Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the development (OEHHA 2015). The Air District uses an exposure period of 30 years (Bay Area Air District 2023b).

The maximum PM_{10} and $PM_{2.5}$ emissions would occur during demolition, site preparation and grading activities, which would only occur for a portion of each individual project's construction facilitated by the Proposed Project, with full buildout occurring gradually through approximately 2050. These activities would typically last for approximately two weeks to two years, depending on the extent of grading and excavation required (e.g., projects with subterranean parking structures or geological constraints require additional grading as compared to those without). PM_{10} and $PM_{2.5}$ emissions would decrease for the remaining construction period because construction activities such as building construction and architectural coating would require less intensive construction equipment. While the maximum DPM emissions associated with demolition, site preparation, and grading activities would only occur for a portion of the overall construction period, these activities represent the worst-case condition for the total construction period. This would represent between 0.1 to 7 percent of the total 30-year exposure period for health risk calculation. Moreover, the proposed rezoning parcels are spread throughout Mountain View such that people affected by construction-related TAC emissions generated at one site would likely not be affected by construction-related TAC emissions generated at another site should construction activities occur simultaneously.

Furthermore, development facilitated by the Proposed Project would be required to implement additional emissions-reduction measures if project-specific analysis identifies the potential for construction-related TAC emissions to exceed the Air District thresholds. According to the OEHHA, construction of individual projects lasting longer than two months or placed within 1,000 feet of

[4] Non-cancer risks include premature death, hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function (CARB 2025b).

sensitive receptors could potentially expose nearby sensitive receptors to substantial pollutant concentrations and therefore could result in potentially significant risk impacts (OEHHA 2015). These projects could exceed the Air District's thresholds of an increased cancer risk of greater than 10.0 in a million and an increased non-cancer risk of greater than 1.0 Hazard Index (Chronic or Acute). Because the exact nature and intensity of reasonably foreseeable development projects is not known at this time, it is speculative to determine whether project-specific mitigation measures would reduce project-level emissions below the Air District thresholds. Therefore, and implementation of Mitigation Measure AQ-2 is required.

ASBESTOS

Air District Regulation 11, Rule 2 is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities (Bay Area Air District 2023b). The rule addresses the national emissions standards for asbestos along with some additional requirements. The rule requires the Lead Agency and its contractors to notify the Air District of any regulated renovation or demolition activity. This notification includes a description of structures and methods utilized to determine whether asbestos-containing materials are potentially present. All asbestos-containing material found on the site must be removed prior to demolition or renovation activity in accordance with Air District Regulation 11, Rule 2, including specific requirements for surveying, notification, removal, and disposal of material containing asbestos. Therefore, individual projects that comply with Regulation 11, Rule 2 would ensure that asbestos-containing materials would be disposed of appropriately and safely. By complying with Air District Regulation 11, Rule 2, thereby minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality. Pursuant to the Air District Guidelines, because Air District Regulation 11, Rule 2 is in place, no further analysis about the demolition of asbestos-containing materials is needed in a CEQA document (Bay Area Air District 2023b).

Operation

In the Bay Area, there are several urban or industrialized communities where the exposure to TACs is relatively high in comparison to others. Sources of TACs include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities (Bay Area Air District 2023b). Operation of development facilitated by the Project would not involve these uses; therefore, it is not considered a source of TACs. In addition, residences do not typically include new stationary sources onsite, such as emergency diesel generators. However, if residences did include a new stationary source onsite, they would be subject to Air District Regulation 2, Rule 2 (New Source Review) and require permitting. This process would ensure that the stationary source does not exceed applicable Air District health risk thresholds. Additionally, the Air District employs the Community Air Risk Evaluation (CARE) Program, which applies strategies to reduce health impacts in impacted communities[5] (Bay Area Air District 2023c).

Project Siting

Development facilitated by the Project would occur under the jurisdictions of the Air District. In 2005, CARB issued recommendations to avoid siting new residences within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day or close to known

[5] CARE is not currently activated in Mountain View since it is not an impacted community.

stationary TAC sources (CARB 2017). Pursuant to Air District Guidelines, a long-range plan would have a less than significant impact if the plan establishes a 500-foot overlay zone on each side of all freeways, high-volume roadways, railyards, and rail lines using diesel locomotives. Major roadways and their proximity to R3 Zoning District Update parcels are shown in Figure 2-6 of Section 2, *Project Description*, of this EIR. For this analysis, it is assumed a significant impact would occur if the Project would place residential land uses within 500 feet of these uses. Implementation of the Proposed Project involves increasing allowed density throughout the Project area that would result in the potential placement of new sensitive receptors (i.e., residences) proximate to existing sources of TACs. Therefore, implementation of Mitigation Measure AQ-3 is required.

Mitigation Measures

The following mitigation measures are required:

AQ-2 Construction Health Risk Assessment

For individual projects where construction activities would occur within 1,000 feet of sensitive receptors, would last longer than two months, and would not utilize a fleet comprised only of EPA rated Tier 4 engines and/or alternative fuel construction equipment or equivalent, a construction health risk assessment (HRA) shall be performed.[6] The construction HRA shall be performed by a qualified air quality consultant coordinated through the City. The HRA shall be conducted following the Office of Environmental Health Hazards Association's (OEHHA) 2015 Health Risk Guidelines (OEHHA 2015) and Air District guidelines to determine potential risk and compare the risk to the following Air District thresholds:

- Increased cancer risk of > 10.0 in a million;
- Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute); or

If risk exceeds the thresholds, measures such as requiring the use of Tier 4 and/or alternative fuel construction equipment or equivalent shall be implemented to reduce the risk to appropriate levels.

AQ-3 Operational Health Risk Assessment

For individual projects that would site sensitive receptors within 500 feet of a freeway, high-volume roadway (urban road with 100,000 vehicles/day or rural road with 50,000 vehicles/day), railyard, or rail line using diesel locomotives, the project applicant shall retain a qualified air quality consultant to prepare an HRA to determine the exposure of new sensitive receptors resulting from the project to existing emission sources. The HRA shall be submitted to the City of Mountain View for review and approval. The HRA shall be conducted following the Office of Environmental Health Hazards Association's (OEHHA) 2015 Health Risk Guidelines (OEHHA 2015) and the Air District guidelines to ensure that potential risk does not exceed the following Air District thresholds:

- Increased cancer risk of > 10.0 in a million;
- Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute)

[6] Sensitive receptors are that segment of the public most susceptible to respiratory distress as a result of poor air quality, such as children under 14, persons over 65, persons engaged in strenuous work or exercise, and people with pre-existing cardiovascular and chronic respiratory diseases. Locations of sensitive receptors include schools, parks and playgrounds, hospitals, day cares, assisted living facilities, and residential communities (CARB 2005).

To ensure that potential risk does not exceed the above thresholds, project applicants shall implement the health risk reduction measures identified in the HRA. Such measures may include, but are not limited to:

- Install, operate, and maintain in good working order a central heating and ventilation system or other air take system in the building of a sensitive receptor that would be impacted by the Project, or in each individual residential unit, that meets the efficiency standard of the minimum efficiency reporting value (MERV) of 13. The heating and ventilation system should include the following features: installation of a high-efficiency filter and/or carbon filter to minimize particulate and other airborne chemical matter from entering the building. Either high-efficiency particulate absorption filters or American Society of Heating, Refrigeration, and Air-Conditioning Engineers 85 percent supply filters should be used.
- Ensure that positive pressure occurs in the building.
- Achieve a performance standard of at least one air exchange per hour of fresh outside filtered air.
- Achieve a performance standard of at least four air exchanges per hour of recirculation.
- Achieve a performance standard of 0.25 air exchanges per hour of unfiltered infiltration if the building is not positively pressurized.

Significance after Mitigation

Implementation of Mitigation Measure AQ-2 would ensure that construction activities would not result in exposure of offsite sensitive receptors to substantial TAC concentrations through incorporation of Tier 4 and/or alternative fuel construction equipment or equivalent. Mitigation Measure AQ-3 would ensure that new development facilitated by the Proposed Project would not expose sensitive receivers to substantial air pollutant concentrations. Implementation of these mitigation measures would reduce impacts from DPM and TACs to a less than significant level.

Threshold 4:	Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact AQ-5 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD NOT CREATE OBJECTIONABLE ODORS THAT COULD AFFECT A SUBSTANTIAL NUMBER OF PEOPLE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust both during normal use and when idling. However, these odors would be temporary and transitory and would cease upon completion. Therefore, development facilitated by the Project would not generate objectionable odors affecting a substantial number of people.

Table 4.2-5 provides the Air District odor screening distances for land uses with the potential to generate substantial odor complaints. Those uses include wastewater treatment plants, landfills or transfer stations, refineries, composting facilities, confined animal facilities, food manufacturing, smelting plants, and chemical plants. As the Proposed Project would involve changes to the R3 Zoning Code to allow for additional capacity for residences, none of the uses identified in the table would occur on the sites. Therefore, development facilitated by the Project would not generate objectionable odors affecting a substantial number of people during operation. This impact would be less than significant.

Mitigation Measures

This impact would be less than significant. No mitigation measures are required.

4.2.4 Cumulative Impacts

IMPACT AQ-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD NOT RESULT IN A CUMULATIVELY CONSIDERABLE INCREASE IN CONSTRUCTION-RELATED CRITERIA AIR POLLUTANTS EMISSIONS. THE PROJECT WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS AND WOULD NOT RESULT IN SIGNIFICANT ODOR IMPACTS. WITH IMPLEMENTATION OF MITIGATION MEASURES AQ-1 THROUGH AQ-3, CUMULATIVE AIR QUALITY IMPACTS WOULD BE LESS THAN SIGNIFICANT. HOWEVER, THE PROPOSED PROJECT WOULD RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF OPERATION-RELATED CRITERIA POLLUTANTS ASSOCIATED WITH VEHICLE EMISSIONS, AND THE PROJECT'S CONTRIBUTION TO THIS CUMULATIVE IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.

The cumulative context for air quality is regional. The SFBAAB is in non-attainment for federal standards of ozone and $PM_{2.5}$ and in non-attainment for the State standard for ozone, $PM_{2.5}$, and PM_{10}. The SFBAAB is in attainment of all other federal and State standards. Development facilitated by the Project would generate particulate matter and the ozone precursors (ROG and NO_X) in the area during construction and operation.

As described under Impact AQ-1, the Project would be consistent with the 2017 Clean Air Plan control measures as development facilitated by the Project would comply with the latest Title 24 regulations and would increase density in areas in proximity to transit, allowing for greater use of alternative modes of transportation. Additionally, the increase in VMT would not exceed the projected population increase per the Air District *CEQA Air Quality Guidelines* for operational emissions from plans. However, cumulative regional growth under Plan Bay Area 2050 creates the potential for increases in total regional VMT and associated pollutant emissions. As discussed under Impact TRA-C 1 within Section 4.13, *Transportation*, any cumulative increase in regional VMT has a direct relationship to cumulative operational air quality impacts. Therefore, the Project would result in a cumulatively considerable contribution and could conflict with or obstruct implementation of the applicable air quality plan.

As described under Impact AQ-2, construction associated with the Proposed Project would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution levels or air quality nuisances. However, future development would be required to comply with policies in the City's 2030 General Plan. In addition, construction allowed under the Proposed Project would implement the Bay Area Air District's Basic Best Management Practices for Construction-Related Fugitive Dust Emissions and Mitigation Measure AQ-1, which would reduce impacts related to construction emissions to a less than significant level. Therefore, the Project would not result in a cumulatively considerable net increase of a criteria pollutant from construction emissions.

A cumulative operational air quality impact would occur if the Project, in combination with past, present, and reasonably foreseeable development, would contribute to regional increases in operational emissions of criteria air pollutants associated with growth-related operational vehicle activity. As discussed under Impact AQ-3, the Project is consistent with applicable Clean Air Plan control measures and, on an individual basis, is not anticipated to increase VMT at a rate exceeding projected population growth. However, cumulative regional growth under Plan Bay Area 2050 creates the potential for increases in total regional VMT and associated pollutant emissions. As discussed under Impact TRA-C-1 within Section 4.13, *Transportation*, uncertainty regarding the

amount, location, and timing of future development precludes reliable parcel-based or quantitative modeling of long-term cumulative operational emissions. Given that motor vehicles remain a primary source of criteria pollutants in the Bay Area, any cumulative increase in regional VMT has a direct relationship to cumulative operational air quality impacts. Consistent with a conservative CEQA approach, and despite the Project's VMT-reducing land use framework, the Proposed Project would result in a cumulatively considerable contribution to regional operational air pollutant emissions.

As identified under Impact AQ-4, development facilitated by the Project would not have a significant impact from odor emissions. The consideration of cumulative odor impacts is limited to cases when projects constructed simultaneously are within a few hundred yards of each other because of the short range of odor dispersion. It is unlikely that construction of housing sites would occur within a few hundred yards of major off-site construction. Additionally, cumulative projects do not include odor-generating uses such as landfills, wastewater treatment plants, or industrial facilities, as described in Section 4, *Environmental Impact Analysis*, of this EIR. Therefore, development facilitated by the Project would not result in a cumulatively considerable odor impact.

4.3 Biological Resources

This section includes a description of the existing setting related to biological resources, provides a regulatory framework that describes existing federal, state and local laws that regulate biological resources, evaluates potential impacts to biological resources due to implementation of the Proposed Project, provides programmatic mitigation measures to address these potential impacts, and evaluates the level of significance after mitigation.

4.3.1 Setting

Biological Resources Setting

According to the City of Mountain View's 2030 General Plan, Mountain View is mostly urbanized but does contain sensitive habitat areas, occurrences of special-status plant and wildlife species, and native plant and wildlife species, many of which are found close to the San Francisco Bay (City of Mountain View 2021). Habitats that may support sensitive biological resources include open water, creeks and streams that provide habitat for sensitive aquatic species, non-native annual grasslands, wetlands, riparian areas, and some developed areas. There are two creeks that flow through the city of Mountain View, Stevens Creek and Permanente Creek (which is joined by Hale Creek near the intersection of Raymundo Avenue and Mountain View Avenue at the City boundary), that provide aquatic habitat for fish, amphibians, birds, and other aquatic invertebrate species.

As detailed in Table 4.12-2 in Section 4.12, *Public Services and Recreation,* Mountain View contains approximately 1,037 acres of parks and open space made up of 19 mini parks, 13 City-owned neighborhood and community parks, 12 School District-owned parks, and two regional parks, totaling approximately 338 acres. The city also contains nearly 700 acres of trail corridors, open space, and special use areas. (City of Mountain View 2014). Land in Mountain View is almost entirely developed, with only 2 percent of land being vacant or used for agriculture (City of Mountain View 2010).

The Project area is almost completely developed and very few undeveloped lots are present. A total of 8,350 parcels would be affected by the Project, including some R-2 zoned parcels and all R3-zoned parcels.

Special-Status Species

For the purposes of this analysis, special-status species include:

- Species listed as threatened or endangered under the Federal Endangered Species Act (FESA); including proposed and candidate species
- Species listed as candidate, threatened, or endangered under the California Endangered Species Act (CESA)
- Species designated as fully protected by the CFGC, and species of special concern or watch list by the California Department of Fish and Wildlife (CDFW)
- Plant species protected by the Native Plant Protection Act (NPPA) (State Rare Plants)
- California Native Plant Society (CNPS) California Rare Plant ranks (CRPR) 1A, 1B, 2A and 2B
- Species designated as locally important by any local agency and/or otherwise protected through ordinance, local policy, or Habitat Conservation Plans (HCP) or Natural Community Conservation Plans (NCCP)

Special-status plant and wildlife species are discussed below in terms of CEQA thresholds of significance. A threshold of significance for a given environmental impact defines the level of effect above which the lead agency will normally consider impacts to be significant, and below which it will normally consider impacts to be less than significant. Lead agencies are responsible for establishing the thresholds of significance for all documents they prepare. They can rely on several sources, including Appendix G of the *CEQA Guidelines*; CEQA's mandatory findings of significance (*CEQA Guidelines* Section 15065); thresholds established by regulatory agencies; thresholds provided in general plans or other local planning documents; or thresholds established by other agencies (CEQA 2020).

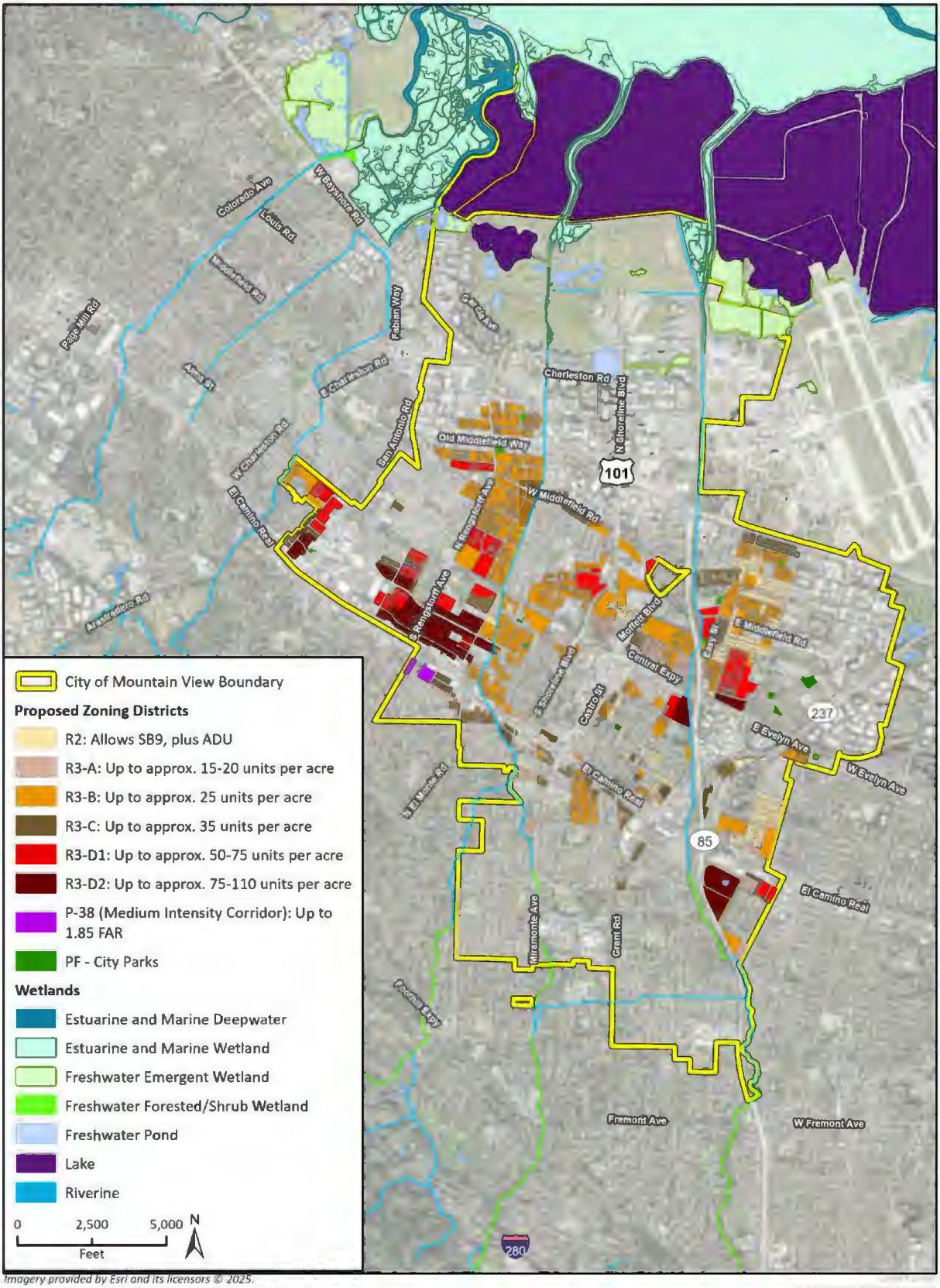
A list of special-status plant and wildlife species with potential to occur in the vicinity of the Project area is included in Appendix D. Definitions regarding potential for species occurrence for this assessment are as follows:

- **Not Expected to Occur.** Habitat within and adjacent to the Project area is lacking for the species' life history requirements (foraging, breeding, cover, range, elevation, hydrology, vegetation community, site history, and/or disturbance regime). There are no documented occurrences of the species in the larger vicinity of the Project area.
- **Low.** Few of the habitat components meeting the species requirements are present, and/or the majority of habitat on and adjacent to the Project area is unsuitable or of poor quality. Because of this, the species is highly unlikely to be found within the Project area. Any documented occurrences of the species are likely further than possible for the species to disperse to the site, or the date of the occurrence is several decades old, or the vicinity of the Project area has been developed in a manner that likely precludes the species from presently occurring.
- **Moderate.** Some of the habitat components meeting the species requirements are present, and/or only some of the habitat on or adjacent to the Project area is unsuitable. There are recently documented occurrences in the near vicinity of the Project area; therefore, the species has a moderate probability of using the Project area.
- **High.** All of the habitat components meeting the species requirements are present, and/or most of the habitat on or adjacent to the Project area is highly suitable. There are documented occurrences of the species on or immediately adjacent to the Project area; therefore, the species has a high probability of utilizing the Project area.
- **Present.** Species was observed within the Project area during field surveys or has been recorded (i.e., CNDDB, or other reports) within the Project area recently.

Development throughout the City of Mountain View has resulted in limited amounts of remaining natural habitat; however, existing creeks and other aquatic resources that have not been fully altered (shown on Figure 4.3-1) could support aquatic species such as fish and amphibians and breeding, cover, and foraging resources for terrestrial wildlife, as well as movement corridors for special-status and common wildlife species. In addition to aquatic habitats, the Project area contains some terrestrial grassland, riparian, and woodland habitats that may also support special-status plant and wildlife species.

Results of the IPaC, CNDDB, and CNPS searches identified 44 special-status plant species and 46 special-status wildlife species known to occur within the 3-mile/nine quad search radius of the Project area (CNPS 2025a; CDFW 2025b; USFWS 2025a). Of these, seven special-status wildlife species have a moderate potential to occur in the Project disturbance area and are listed in Table 4.3-1 below.

Figure 4.3-1 Aquatic Resources in the City of Mountain View



All 44 special-status plant species and the remaining 37 special-status wildlife species are not expected to occur or have a low potential to occur due to a lack of suitable habitat in the Project disturbance area, the Project area is outside of the species' known range, or the disturbed nature of the Project area likely precludes the remaining special-status plant and wildlife species from occurring; therefore, these species are not discussed further within this analysis, as there would be no impact or less than significant impacts to these species.

Table 4.3-1 Special-status Wildlife Species with a Moderate Potential to Occur in the Project Area

Common Name	Scientific Name	Status (Federal)	Status (State)
California red-legged frog	*Rana draytonii*	Threatened	Species of Special Concern
Crotch's bumble bee	*Bombus crotchii*	None	Candidate Endangered
monarch (population 1)	*Danaus plexippus plexippus*	Proposed Threatened	None
northwestern pond turtle	*Actinemys marmorata*	Proposed Threatened	Species of Special Concern
steelhead – Central California Coast DPS (population 8)	*Oncorhynchus mykiss irideus*	Threatened	Species of Special Concern
western burrowing owl	*Athene cunicularia*	None	Candidate Endangered
western red bat	*Lasiurus blossevillii*	None	Species of Special Concern

Some intermittent streams, freshwater ponds, lakes, and estuarine wetland habitats are located in Mountain View, which may provide habitat for aquatic special-status wildlife species, such as the northwestern pond turtle, California red-legged frog, and steelhead. Parks, isolated undeveloped areas surrounded by development, landscaped areas, and creek corridors are located in Mountain View, which may provide habitat for special-status wildlife species, such as Crotch's bumble bee, monarch, burrowing owl, and special-status bat species.

For a complete list of species assessed for this Project, please refer to Appendix D.

Sensitive Vegetation Communities

Sensitive vegetation communities were assessed in accordance with the CDFW *California Natural Community List,* which ranks vegetation communities occurring throughout California, and is based in part on global (G) and state (S) rarity ranks (CDFW 2025c). Vegetation communities ranked S1 to S3 are generally considered sensitive, though some communities with other ranks may also be considered sensitive. Communities dominated by non-native species are considered semi-natural alliances and have no global and state rankings (ranking denoted as GNASNA, global/state rank not applicable).

Critical Habitat

A query of the National Marine Fisheries Service (NMFS) Endangered Species Act (ESA) Critical Habitat Mapper (NOAA 2025a) and the USFWS Critical Habitat Portal (USFWS 2025b) was conducted to determine if National Oceanic and Atmospheric Administration (NOAA)-designated critical habitat or USFWS-designated critical habitat for ESA-listed species occurs in the City of Mountain View. NOAA-designated critical habitat for Central California Coast (CCC) Distinct Population Segment (DPS) steelhead occurs within the Project area in Stevens Creek. No USFWS-designated critical habitat occurs within the Project area. The nearest USFWS-designated critical habitat, which is for western snowy plover, is located 7 miles from the Project area.

Nesting Birds

Suitable nesting habitat for avian species protected by the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC), including shrubs, trees, man-made structures, buildings, power poles and infrastructure, and the ground surface, occur throughout Mountain View. Some species prefer to nest in vegetation such as trees, shrubs, and ornamental landscaping, and some species can be found nesting in man-made structures, such as power poles or the eaves of buildings. In addition, some species nest directly on the ground in annual grassland habitat, gravel lots, or bare ground in disturbed areas. The typical breeding season for nesting birds is from February 1 through August 31, and beginning January 1 for some raptor species.

Aquatic Resources

Rincon conducted a query of the U.S. Fish and Wildlife Service (USFWS) *National Wetland Inventory* (NWI) (USFWS 2025a) and the U.S. Geological Survey (USGS) National Hydrography Dataset (USGS 2025) and reviewed current and past aerial imagery (Google 2025), to determine the locations and types of aquatic resources that could be affected by implementation of the Proposed Project. These resources were also evaluated to determine the potential for regulation by the U.S. Army Corps of Engineers (USACE) pursuant to Section 404 of the Clean Water Act (CWA), the Regional Water Quality Control Board (RWQCB) pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act (Porter-Cologne), and/or by the California Department of Fish and Wildlife (CDFW) pursuant to Section 1600 *et seq.* of the California Fish and Game Code (CFGC).

The City of Mountain View includes part of the shoreline of the San Francisco Bay; however, the parcels that would be affected in the Project area are situated between one and 1.5 miles south of the San Francisco Bay. Because the parcels that would be affected in the Project area are not located in or near the shoreline or Baylands, this analysis does not further analyze impacts to the shoreline or Baylands.

Stevens Creek and Permanente Creek flow through Mountain View, in addition to other aquatic features that occur throughout the City, including lakes, freshwater ponds, freshwater forested/shrub wetlands, freshwater emergent wetlands, and estuarine and marine wetlands.

As seen in Figure 4.3-1,of these aquatic features, Stevens Creek, Permanente Creek, freshwater ponds, and freshwater/forested shrub wetland features are in proximity to parcels that will be developed or redeveloped in the Project area.

Permanente Creek originates in the foothills southwest of Mountain View and flows north through the valley floor once it reaches Los Altos. A trapezoidal concrete diversion channel and floodgate were constructed near the intersection of Miramonte Avenue and Berry Avenue by the Santa Clara Valley Water District in 1959 to divert the creek east, where it passes through a culvert under Highway 85 to join with Stevens Creek. The steep drop at the culvert location acts as a barrier to fish migration upstream in Permanente Creek. Only during high floods can a portion of the creek's waters top the floodgate at the diversion location and return to the original channel that flows north. From there, sakrete banks and weirs have been constructed intermittently along the Permanente Creek channel and the creek has been modified near the confluence with Hale Creek to flow through a concrete channel until it passes under Highway 101, returns to a natural channel, and turns into Mountain View Slough before it joins the San Francisco Bay.

Stevens Creek is a mostly natural channel and is known to support anadromous fish species (Valley Water 2021). The Santa Clara Valley Water District is currently working on the Evelyn Avenue Fish Passage Project, which will be completed in 2026 (Valley Water 2025). The Fish Passage Project will

remove passage barriers and create a roughened channel with riffles and pools to mimic natural streams, add large wood features to enhance aquatic habitat, and stabilize eroding banks downstream of Evelyn Avenue. Implementation of the Fish Passage Project will allow Central California Coast steelhead (*Oncorhynchus mykiss irideus*) to migrate upstream to natal spawning habitats.

Wildlife Movement Corridors

Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as providing a linkage between foraging and denning areas, or they may be regional in nature. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Others may be important as dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network.

The habitats within the link do not necessarily need to be the same as the habitats that are being linked. Rather, the link merely needs to contain sufficient cover and forage to allow temporary inhabitation by ground-dwelling species. Typically, habitat linkages are contiguous strips of natural areas, though dense plantings of landscape vegetation can be used by certain disturbance-tolerant species. Depending upon the species using a corridor, specific physical resources (such as rock outcroppings, vernal pools, or oak trees) may need to be located within the habitat link at certain intervals to allow slower-moving species to traverse the link. For highly mobile or aerial species, habitat linkages may be discontinuous patches of suitable resources spaced sufficiently close together to permit travel along a route in a short period of time.

The Project area is also located within the Pacific Flyway near the San Francisco Bay. The Pacific Flyway is a major North American migration route for birds, especially waterbirds. As birds travel the flyway on their annual north-south migration, they need stopover sites such as wetlands with suitable habitat and food supply. These wetlands, such as the ones in the Project area, provide critical wintering habitat for migrating waterfowl. Creeks in the Project area may serve as local small-scale wildlife corridors for movement; however, the rest of the Project area is developed and provides few opportunities for movement throughout the urban center of City of Mountain View.

Essential Fish Habitat

A query of the NOAA Fisheries Essential Fish Habitat Mapper (NOAA 2025b) was conducted to determine if Essential Fish Habitat (EFH) and Habitat Areas of Particular Concern (HAPC) occur(s) in the City of Mountain View. The location of the Proposed Project contains EFH regulated under the Magnuson-Stevens Fishery and Conservation Management Act (MSA). Essential Fish Habitat typically provides habitat for multiple species of commercially important fish, including Chinook salmon and coho salmon, that are federally managed under the Pacific Coast Salmon Fishery Management Plan (FMP). However, the Project site does not contain HAPC where fish species depend on to survive and reproduce.

Although EFH is mapped for Chinook salmon and coho salmon within the reach of Stevens Creek in the Project area, Stevens Creek does not provide suitable habitat for these species as it lacks sufficient cobbly substrates for spawning. Additionally, Chinook and coho salmon have not historically inhabited Stevens Creek, and there are no recent CNDDB-documented occurrences of these species within Stevens Creek or the larger vicinity of the Project; therefore, the Project is not

likely to adversely affect EFH. As a result, Chinook salmon and coho salmon EFH are not discussed further in this document.

4.3.2 Regulatory Setting

This section provides information regarding the various laws and acts that regulate biological resources in the Proposed Project area.

a. Federal Regulations

Federal Endangered Species Act

The Federal Endangered Species Act of 1973 (FESA) and subsequent amendments provide for the conservation of endangered and threatened species, and the ecosystems upon which they depend.

FESA is intended to prevent the unlawful "take" of listed fish, wildlife, and plant species. Section 9(a)(1)(B) specifically states take of species listed as threatened or endangered is unlawful. Take is defined as any action that would harass, harm, pursue, hunt, wound, shoot, kill, trap, capture, or collect any threatened or endangered species.

Section 10 of the FESA allows USFWS to issue incidental take permits if take of a listed species may occur during otherwise lawful activities. Section 10(a)(1)(B) requires a Habitat Conservation Plan for an incidental take permit on non-federal lands. Section 7 of the FESA requires federal agencies to aid in the conservation of listed species, and to ensure that the activities of federal agencies will not jeopardize the continued existence of listed species or adversely modify designated critical habitat. The USFWS and the National Oceanic and Atmospheric Administration (NOAA) are responsible for administration of the FESA and have regulatory authority over federally listed species.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712) implements four international conservation treaties that the U.S. entered into with Canada in 1916, Mexico in 1936, Japan in 1972, and Russia in 1976. It is intended to ensure the sustainability of populations of all protected migratory bird species. The law has been amended with the signing of each treaty, as well as when any of the treaties were amended, such as with Mexico in 1976 and Canada in 1995 (U.S. Fish & Wildlife). The Migratory Bird Treaty Act (MBTA) makes it unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, or kill migratory birds, and prohibits the removal of nests occupied by migratory birds. The USFWS has regulatory authority for the MBTA.

Clean Water Act Section 404

Congress enacted the Clean Water Act (CWA) "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the law was significantly reorganized and expanded in 1972. "Clean Water Act" became the law's common name with amendments in 1972.

Section 404 of the CWA establishes a program to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Section 404 of the CWA authorizes the Secretary of the Army, acting through the USACE, to issue permits regulating the discharge of dredged or fill materials into the "navigable waters at specified disposal sites." Section 404 requires

that a permit be issued before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from regulation under Section 404 (e.g., certain farming and forestry activities).

Waters of the U.S.

The USACE and US Environmental Protection Agency (USEPA) have undertaken several efforts to modernize their regulations defining "waters of the United States" (e.g., the 2015 Clean Water Rule and 2020 Navigable Waters Protection Rule), but these efforts have been frustrated by legal challenges which have invalidated the updated regulations. As a result of the Supreme Court ruling in *Sackett v. Environmental Protection Agency*, EPA and USACE issued a final rule that amends the "Revised Definition of 'Waters of the United States'" to conform key aspects of the regulatory text to the U.S. Supreme Court's decision (88 Federal Register 61964–61969, September 8, 2023).

Under the "Revised Definition of 'Waters of the United States'; Conforming" rule, the term "waters of the United States" is defined as follows (33 CFR 328.3[a]):

(1) Waters which are:
   (i) Currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
   (ii) The territorial seas; or
   (iii) Interstate waters;

(2) Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under paragraph (a)(5) of this section;

(3) Tributaries of waters identified in paragraph (a)(1) or (2) of this section that are relatively permanent, standing or continuously flowing bodies of water;

(4) Wetlands adjacent to the following waters:
   (i) Waters identified in paragraph (a)(1) of this section; or
   (ii) Relatively permanent, standing or continuously flowing bodies of water identified in paragraph (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;

(5) Intrastate lakes and ponds not identified in paragraphs (a)(1) through (4) of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in paragraph (a)(1) or (a)(3) of this section.

In addition, the amended regulations include eight types of excluded waters (33 CFR 328.3[b]) which are not "waters of the United States" even where they otherwise meet the terms of paragraphs (a)(2) through (5) of this section:

(1) Waste treatment systems, including treatment ponds or lagoons, designed to meet the requirements of the Clean Water Act;

(2) Prior converted cropland designated by the Secretary of Agriculture. The exclusion would cease upon a change of use, which means that the area is no longer available for the production of agricultural commodities. Notwithstanding the determination of an area's status as prior converted cropland by any other Federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with EPA;

(3) Ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water;

(4) Artificially irrigated areas that would revert to dry land if the irrigation ceased;

(5) Artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;

(6) Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;

(7) Waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States; and

(8) Swales and erosional features (e.g., gullies, small washes) characterized by low volume, infrequent, or short duration flow.

The lateral limits of USACE jurisdiction in non-tidal waters is defined by the "ordinary high-water mark" (OHWM) unless adjacent wetlands are present. The OHWM is a line on the shore or edge of a channel established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed upon the bank, shelving, changes in the character of soil, destruction of vegetation, or the presence of debris (33 CFR 328.3(e)). As such, waters are recognized in the field by the presence of a defined watercourse with appropriate physical and topographic features. If wetlands occur within, or adjacent to, waters of the United States, the lateral limits of USACE jurisdiction extend beyond the OHWM to the outer edge of the wetlands (33 CFR 328.4 (c)). The upstream limit of jurisdiction in the absence of adjacent wetlands is the point beyond which the OHWM is no longer perceptible (33 CFR 328.4; see also 51 FR 41217).

Wetlands

The USACE defines wetlands as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3). Indicators of three wetland parameters (hydric soils, hydrophytic vegetation, and wetlands hydrology), as determined by site investigation, must be present at a site for USACE to classify the site as a wetland (Environmental Laboratory 1987).

LIMITATIONS ON JURISDICTION BASED ON SACKETT V. USEPA SUPREME COURT DECISION

On May 25, 2023, the Supreme Court issued its decision on the petition from the Sacketts, a family in Idaho that was subject to a compliance order from the USEPA for backfilling their lot near Priest Lake, which the USEPA claimed contained federally regulated wetlands. The wetlands in question were adjacent to a ditch that fed a creek that ultimately drained into Priest Lake, a navigable water body. The USEPA asserted that the Sacketts had violated the law by filling the wetlands on their property without a permit. The Court's decision addressed controversy over whether, and under what conditions, the CWA reaches navigable waters' tributaries or adjacent wetlands. The Supreme Court's decision in Sackett provides definitive guidance to the agencies in determining the limits of their Clean Water Act authority. Major tenets of the decision have been incorporated into the agencies' current regulations through the September 2023 Conforming Rule.

The Court decided:

- "Adjacent wetlands" are WOTUS only if there is a continuous surface connection between the wetland and a navigable or relatively permanent water body, such that it is difficult to determine the boundary between the wetland and the water body. The opinion notes that "temporary interruptions to surface connection may sometimes occur because of phenomena like low tides or dry spells." The agencies addressed this element by defining the term "adjacent" to mean "having a continuous surface connection" in the Conforming Rule.
- The Significant Nexus Standard, introduced by the Court in prior decisions, is not mentioned in the Clean Water Act and should not be used. The Court determined that the standard applies ecological factors whose use in determining jurisdiction is not supported by the statute. The Conforming Rule removed significant nexus considerations from the definition.
- Although jurisdiction over tributaries was not addressed by the Court, the decision stated that "…the [Clean Water Act's] use of "waters" encompasses only those relatively permanent, standing or continuously flowing bodies of water forming geographical features that are described in ordinary parlance as streams, oceans, rivers, and lakes." The Conforming Rule makes clear that only relatively permanent tributaries qualify as "waters of the United States."

RIVERS AND HARBORS ACT SECTION 10

Section 10 of the Rivers and Harbors Act of 1899 requires authorization from the USACE for the construction of any structure in or over any navigable water of the United States. Structures or work outside the limits defined for navigable waters of the United States require a Section 10 permit if the structure or work affects the course, location, or condition of the water body. The law applies to any dredging or disposal of dredged materials, excavation, filling, re-channelization, or any other modification of a navigable water of the United States, and applies to all structures and work. It further includes, without limitation, any wharf, dock, weir, boom breakwater, jetty, groin, bank protection (e.g., riprap, revetment, bulkhead), mooring structures such as pilings, aerial or subaqueous power transmission lines, intake or outfall pipes, permanently moored floating vessel, tunnel, artificial canal, boat ramp, aids to navigation, and any other permanent, or semi-permanent obstacle or obstruction. It is important to note that Section 10 applies only to navigable waters, and thus does not apply to work in non-navigable wetlands or tributaries. In some cases, Section 10 authorization is issued by the USACE concurrently with CWA Section 404 authorization, such as when certain Nationwide Permits are used.

COASTAL ZONE MANAGEMENT ACT OF 1972

The Coastal Zone Management Act of 1972 (16 USC 1451 et seq.), administered by the National Oceanic and Atmospheric Administration (NOAA), provides for the management of the nation's coastal resources, including the Great Lakes. The goal is to "preserve, protect, develop, and where possible, to restore or enhance the resources of the nation's coastal zone." Each federal agency activity within or outside of the coastal zone that affects any land or water use or natural resources of the coastal zone must be carried out in a manner consistent to the maximum extent practicable with the enforceable policies of the approved state management programs. The policies of the California Coastal Act of 1976 (Coastal Act) govern the types of developments and uses allowed within wetlands and other waters within the Coastal Zone, including open coastal waters. Along the Pacific coast, open coastal waters extend from the mean high-water (MHW) line to the state's outer limit of jurisdiction, approximately 3 miles offshore.

Magnuson-Stevens Fishery Management Act

The Magnuson–Stevens Fishery Conservation and Management Act (16 U.S.C. §§ 1801 et seq.) is the primary law governing marine fisheries management in U.S. federal waters. The Act establishes eight Regional Fishery Management Councils that develop Fishery Management Plans (FMPs) to maintain sustainable fisheries, protect EFH, and prevent overfishing. Under the MSA, federal agencies must consult with the National Marine Fisheries Service (NMFS) when a proposed project may adversely affect designated EFH. Consultation ensures that projects incorporate measures to avoid, minimize, or mitigate potential adverse effects to EFH and federally managed fish stocks. If the proposed project could affect marine resources through in-water construction, dredging, coastal development, or discharges in or near EFH, the lead agency must coordinate with NMFS during project review to ensure protection of fishery resources.

b. State Regulations

California Endangered Species Act

The CDFW is responsible for administration of CESA. For projects that may affect both a State and federal listed species, compliance with the FESA will satisfy the CESA, provided the CDFW determines that the federal incidental take authorization is consistent with the CESA.

Take is defined in CFGC Section 86 as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." The CESA allows for take incidental to otherwise lawful activities under CFGC Section 2081. Project proponents wishing to obtain incidental take permits are able to do so through a permitting process outlined in California Code of Regulations (CCR) Section 783. Additionally, some sensitive mammals and birds are protected by the State as Fully Protected Mammals or Fully Protected Birds, as described in the CFGC, Sections 4700 and 3511, respectively.

Projects that may result in a take of a California listed species require a take permit under the CESA. The federal and State acts lend protection to 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 den locations, communal roosts, and other essential habitat. Unlike the FESA, the CESA prohibits the take of not just listed endangered or threatened species, but also candidate species (species petitioned for listing).

The CESA defines an endangered species as:

> …a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease.

A threatened species is defined as:

> …a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as rare on or before January 1, 1985 is a threatened species.

Candidate species are defined as:

> …a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list.

Candidate species may be afforded temporary protection as though the species were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike the FESA, CESA does not include listing provisions for invertebrate species. Article 3, Sections 2080 through 2085, of the CESA addresses the taking of threatened or endangered species by stating:

> …no person shall import into this State, export out of this State, or take, possess, purchase, or sell within this State, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided.

California Fish and Game Code Sections 3503, 3511, 3513, 4150

According to CFGC Section 3503 it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird [except English sparrows (*Passer domesticus*) and European starlings (*Sturnus vulgaris*)]. Sections 3503 and 3513 prohibit the taking of specific birds, their nests, eggs, or any portion thereof during the nesting season. Section 3503.5 specifically protects birds in the orders Falconiformes and Strigiformes (birds-of-prey). Section 3513 essentially overlaps with the federal MBTA, prohibiting the take or possession of any migratory nongame bird. Section 3511 states fully protected birds or parts thereof may not be taken or possessed at any time. All nongame mammals, including bats, are protected by California Fish and Game Code 4150.

California Native Plant Protection Act

The California Native Plant Protection Act (NPPA) was enacted in 1977 and allows the California Fish and Wildlife Commission to designate plants as rare or endangered. Currently, 64 species, subspecies, and varieties of plants are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations. Effective in 2015, CDFW promulgated regulations (14 CCR 786.9) under the authority of the NPPA, establishing that the CESA permitting procedures (CFG Code Section 2081) would be applied to plants listed under the NPPA as "Rare." With this change, there is little practical difference between regulations and protocols for plants listed under CESA and those listed under the NPPA.

Regional Water Quality Control Board

The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) have jurisdiction over "waters of the State," which are defined as any surface water or groundwater, including saline waters, within the boundaries of the state (California Water Code sec. 13050(e)). These agencies also have responsibilities for administering portions of the CWA.

Clean Water Act Section 401

Section 401 of the CWA requires an applicant requesting a federal license or permit for an activity that may result in any discharge into navigable waters (such as a Section 404 Permit) to provide state certification that the proposed activity will not violate state and federal water quality standards. In California, CWA Section 401 Water Quality Certification (Section 401 Certification) is issued by the RWQCBs and by the SWRCB for multi-region projects. The process begins when an applicant submits an application to the RWQCB and informs the USACE (or the applicable agency from which a license or permit was requested) that an application has been submitted. The USACE will then determine a "reasonable period of time" for the RWQCB to act on the application; this is typically 60 days for routine projects and longer for complex projects but may not exceed one year. When the period has elapsed, if the RWQCB has not either issued or denied the application for Section 401 Certification, the USACE may determine that Certification has been waived and issue the requested permit. If a Section 401 Certification is issued it may include binding conditions, imposed either through the Certification itself or through the requested federal license or permit.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter-Cologne Act) is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code section 13000 et seq.), the policy of the State is as follows:

- The quality of all the waters of the State shall be protected
- All activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason
- The State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation

The Porter-Cologne Act established nine RWQCBs (based on watershed boundaries) and the SWRCB, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The SWRCB provides program guidance and oversight, allocates funds, and reviews RWQCB decisions. In addition, the SWRCB allocates rights to the use of surface water. The RWQCBs have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The SWRCB and RWQCBs have numerous nonpoint source related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

Section 13260 of the Porter-Cologne Act requires any person discharging or proposing to discharge waste that could affect the quality of waters of the State to file a Report of Waste Discharge with the appropriate RWQCB. The RWQCB may then authorize the discharge, subject to conditions, by issuing Waste Discharge Requirements (WDRs). While this requirement was historically applied primarily to outfalls and similar point source discharges, the SWRCB's *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State*, effective May 2020, make it clear that the agency will apply the Porter-Cologne Act's requirements to discharges of dredge and fill material as well. The *Procedures* state that they are to be used in issuing CWA Section 401 Certifications and WDRs, and largely mirror the existing review requirements for CWA Section 404 Permits and Section 401 Certifications, incorporating most elements of the USEPA's *Section 404(b)(1) Guidelines*. Following issuance of the *Procedures*, the SWRCB produced a

consolidated application form for dredge/fill discharges that can be used to obtain a CWA Section 401 Water Quality Certification, WDRs, or both.

Non-Wetland Waters of the State

The SWRCB and RWQCBs have not established regulations for field determinations of waters of the state except for wetlands currently. In many cases the RWQCBs interpret the limits of waters of the State to be bounded by the OHWM unless isolated conditions or ephemeral waters are present. However, in the absence of statewide guidance each RWQCB may interpret jurisdictional boundaries within their region and the SWRCB has encouraged applicants to confirm jurisdictional limits with their RWQCB before submitting applications. As determined by the RWQCB, waters of the State may include riparian areas or other locations outside the OHWM, leading to a larger jurisdictional area over a given water body compared to the USACE.

Wetland Waters of the State

Procedures for defining wetland waters of the State pursuant to the SWRCB's *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* went into effect May 28, 2020. The SWRCB defines an area as wetland if, under normal circumstances:

(i) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both;

(ii) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and

(iii) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.

The SWRCB's *Implementation Guidance for the Wetland Definition and Procedures for Discharges of Dredge and Fill Material to Waters of the State* (2020), states that waters of the U.S. and waters of the State should be delineated using the standard USACE delineation procedures, taking into consideration that the methods shall be modified only to allow for the fact that a lack of vegetation does not preclude an area from meeting the definition of a wetland.

California Coastal Act of 1976

The Coastal Act (Public Resources Code Section 30000 et seq.) was enacted to establish policies and guidelines that provide direction for the conservation and development of the California coastline. The Coastal Act established the California Coastal Commission (CCC) and created a state and local government partnership to ensure that public concerns regarding coastal development are addressed. Some of the basic goals of this program are to protect, maintain, and, where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources; maximize public access to and public recreational opportunities along the coast; and ensure priority for coastal-dependent and coastal-related development over other development on the coast.

The CCC serves as the coastal management and regulatory agency with jurisdiction over the Coastal Zone (Public Resources Code Section 30103). The California Coastal Zone generally extends seaward 3 miles and inland anywhere from 0.5 miles to 5 miles. The CCC is responsible for assisting in the preparation, review, and certification of Local Coastal Programs/Local Coastal Plans (LCPs), which are developed by municipalities for that portion of their jurisdiction that falls within the Coastal

Zone. Once the LCP has been certified, regulatory responsibility is delegated to the local jurisdiction, although the CCC retains jurisdiction over the immediate shoreline.

California Fish and Game Code Section 1600 et seq.

Pursuant to CFGC Section 1600, CDFW has authority over all perennial, intermittent, and ephemeral rivers, streams, and lakes in the State, and requires any person, state or local governmental agency, or public utility to notify the CDFW before beginning any activity that would "substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake" that supports fish or wildlife resources.

A stream is defined as a "body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation" (California Code of Regulations, Title 14 Section 1.72). A Lake or Streambed Alteration Agreement may be required for any proposed project that would result in an adverse impact to a river, stream, or lake. CDFW jurisdiction typically extends to the top of the bank and out to the outer edge of adjacent riparian vegetation if present. However, CDFW can take jurisdiction over a body of flowing water and the landform that conveys it, including water sources and adjoining landscape elements that are byproducts of and affected by interactions with flowing water without regard to size, duration, or the timing of flow.

CDFW Special Animals List

Special-status wildlife species are those species included on the CDFW "Special Animals" list. "Special Animal" is a general term that refers to all of the taxa the CNDDB is interested in tracking, regardless of their legal or protection status. The CDFW considers the taxa on this list to be those of greatest conservation need. The species on this list generally fall into one or more of the following categories:

- Officially listed or proposed for listing under the CESA and/or FESA
- State or federal candidate for possible listing
- Taxa that meet the criteria for listing, even if not currently included on any list, as described in
- CEQA Guidelines Section 15380
- Taxa considered by the Department to be a Species of Special Concern
- Taxa that are biologically rare, very restricted in distribution, declining throughout their range, or have a critical vulnerable stage in their life cycle that warrants monitoring
- Populations in California that may be on the periphery of a taxon's range but are threatened with extirpation in California

c. Local Regulations

Mountain View 2030 General Plan

The Mountain View 2030 General Plan provides guidance for the City of Mountain View's development and preservation. The 2030 General Plan includes goals, polices, and actions that provide guidance for preservation of the City's natural resources including:

Goal LUD-10: High-quality, sustainable and healthful building design and development.

Policy LUD 10.2: **Low impact development.** Encourage development to minimize or avoid disturbing natural resources and ecologically significant features.

Goal LUD-16: A diverse area of complementary land uses and open space resources.

Policy LUD 16.1: Protected open space. Protect and enhance open space and habitat in the North Bayshore area.

Goal INC-5: Effective and comprehensive programs utilizing water use efficiency, water conservation and alternative water supplies to reduce per capita potable water use.

Policy INC 5.5 Landscape efficiency. Promote water-efficient landscaping including drought-tolerant and native plants, along with efficient irrigation techniques.

Goal INC-16: Rich and biologically diverse ecological resources which are protected and enhanced.

Policy INC 16.1: Natural areas. Work with regional agencies to protect and enhance natural areas.

Policy INC 16.2: Shoreline at Mountain View. Manage Shoreline at Mountain View Regional Park to balance the needs of recreational, open space, habitat, commercial and other uses.

Policy INC 16.3: Habitat. Protect and enhance nesting, foraging and other habitat for special-status species and other wildlife.

Policy INC 16.4: Invasive species. Contain and reduce the amount of invasive species.

Policy INC 16.5: Wetland habitat. Collaborate with and support regional efforts to restore and protect wetlands, creeks, tidal marshes and open-water habitats adjacent to San Francisco Bay.

Policy INC 16.6: Built environment habitat. Integrate biological resources, such as green roofs and native landscaping, into the built environment.

Goal INC-19: Effective and ecologically sensitive programs to control invasive species and plants.

Policy INC 19.1: Municipal integrated pest management. Control and prevent invasive weeds and pests using integrated pest management on all City property, including the following principles:

- A focus on control of pests at established acceptable levels, instead of eradication.
- Preventive cultivation practices appropriate for local conditions.
- Monitoring.
- Mechanical controls such as hand-picking, barriers, traps and disruption.
- Biological controls such as beneficial insects or biological insecticides.
- Chemical controls only as required or during targeted times during a pest's life cycle

Policy INC 19.3: Citywide integrated pest management. Encourage and educate residents and businesses to implement integrated pest management principles and reduce the use of pesticides and herbicides.

Goal POS-3: Open space areas with natural characteristics that are protected and sustained.

Policy POS-3.1: Collaboration on sea-level rise impacts. Collaborate with regional, state and federal agencies to address the effects of potential rises in sea levels through.

Mountain View City Code

Mountain View City Code Chapter 32 "Trees, Shrubs and Plants", provides regulations for the protection, preservation, maintenance, removal, and replacement of trees associated with proposals for construction and development. A summary of these regulations is provided below.

Article I. - General

The director of parks and recreation has the authority to enforce the regulations in this chapter (Section 32.3). A master street tree plan shall be prepared by the director of parks and recreation and shall designate the type, form, and location of all street trees and shrubs in the city (Section 32.4). Any owner of property fronting any street or public place may request the director of parks and recreation to cause to be planted or located on such street or public place the official street trees designated by the master street tree plan (Section 32.5). No person shall cut, trim, prune, plant, spray, remove, injure, or interfere with any street tree or shrub without the prior written permission of the director of parks and recreation (Section 32.6). During the erection, repair, alteration or removal of any building, house or structure in the city, the person in charge of such work shall provide good and sufficient guards and protective measures as shall prevent injury to any street tree or shrub in the vicinity of such work, arising out of or by reason of such erection, repair, alteration or removal (Section 32.11).

Article II. – Protection of the Urban Forest

This article sets forth the policy of the city to require the preservation of all healthy heritage trees unless reasonable and conforming use of the property justifies the removal, cutting, pruning, and/or encroachment into the drip line of a heritage tree (Section 32.22). The council may, by resolution, designate any tree or grove of trees on public or private property as heritage trees (Section 32.24). Any person who owns, controls, has custody or possession of any real property within the city shall maintain and preserve all heritage trees located thereon in a state of good health (Section 32.25). The urban forestry board shall act as the decision-making body for heritage tree appeals (Section 32.26). No person shall cut down, destroy, remove or relocate any heritage tree growing on public or private property, or on any city-owned property, unless a valid heritage tree removal permit has been granted by the city pursuant to this article. Exemptions to the permit include trees damaged by natural disasters, emergency situations, any tree that is determined to be dead, etc. An application for a development-related heritage tree removal permit shall be filed with the community development department (Section 32.27). The application shall be filed and processed concurrently with any other application(s) for development entitlements (Section 32.29). An application for a nondevelopment-related heritage tree removal permit, including projects requiring a building permit only, shall be filed with the community services department (Section 32.30). Any person who removes a heritage tree without a permit issued pursuant to this article shall secure from the city a post-removal permit (Section 32.32).

The City of Mountain View Standard Conditions of Approval (COAs)

The City of Mountain View COAs are a list of requirements placed on development projects by the city which ensure a project complies with city policies. The City of Mountain View provides requirements related to environmental resources including:

PL-53 Bird-Strike Management Plan

A bird-strike management plan, which provides project design features to reduce bird strikes, and a bird-strike monitoring plan postconstruction shall be submitted as part of the building permit submittal with recommended provisions included in the building permit plans.

PL-133 Arborist Report

A qualified arborist shall provide written instructions for the care of the existing tree(s) to remain on-site before, during, and after construction. The report shall also include a detailed plan showing installation of chain link fencing around the dripline to protect these trees and installation of an irrigation drip system and water tie-in for supplemental water during construction. Arborist's reports shall be received by the Planning Division and must be approved prior to issuance of building permits. Prior to occupancy, the arborist shall certify in writing that all tree preservation measures have been implemented. Approved measures from the report shall be included in the building permit drawings.

PL-134 Arborist Inspections

During demolition activity and upon demolition completion, a qualified arborist shall inspect and verify the measures described in the arborist report are appropriately implemented for construction activity near and around the preserved trees, including the critical root zones. Should it be determined that the root systems are more extensive than previously identified and/or concerns are raised of nearby excavation or construction activities for the project foundation or underground parking garage, the design of the building and/or parking garage may need to be altered to maintain the health of the trees prior to building permit issuance.

PL-135 Monthly Arborist Inspections

Throughout demolition and construction, a qualified arborist must conduct monthly inspections to ensure tree protection measures and maintenance care are provided. A copy of the inspection letter, including recommendations for modifications to tree care or construction activity to maintain tree health, shall be provided to the Planning Division at planning.division@mountainview.gov.

PL-138 Tree Removals

Permits to remove, relocate, or otherwise alter Heritage trees cannot be implemented until a project building permit for new construction is secured and the project is pursued.

PL-139 Replacement Trees

The applicant shall offset the loss of each Heritage/street tree with replacement trees, as determined by the Planning Division. Each replacement tree shall be no smaller than a 24" box and shall be noted on the landscape plan as Heritage or street replacement trees.

PL-141 Street Tree Protections

All designated City street trees are to be protected throughout construction activity with protection measures shown on building permit plans.

PL-142 Tree Protection Measures

The tree protection measures listed in the arborist's report shall be included as notes on the title sheet of all grading and landscape plans. These measures shall include, but may not be limited to, 6' chain link fencing at the drip line, a continuous maintenance and care program, and protective grading techniques. Also, no materials may be stored within the drip line of any tree on the project site.

PL-145 Irrevocable Damage to Heritage Trees

In the event one or more of the preserved Heritage tree(s) are not maintained and irrevocable damage or death of the tree(s) has occurred due to construction activity, a stop work order will be issued on the subject property and no construction activity shall occur for two (2) working days per damaged tree. The applicant will also be subject to a penalty fee at twice the tree valuation prior to damage; this fee applies to each Heritage tree damaged. No construction activity can resume until the penalty fee(s) have been paid to the City.

PL-146 Tree Relocation(s)

Tree(s) numbered in the arborist report prepared shall be relocated to another location on-site as identified in the approved site and landscape plans.

PL-147 Off-Site Tree Mitigation

There is no suitable on-site location for replacement trees. Therefore, the applicant shall either pay a fee or donate box trees to the City or other public agency to be used elsewhere in the community. The fee for replacement of a tree or trees shall be, at a minimum, based on the cost of a 24" box tree of the same species, delivered and installed.

PL-148 Tree Replacement Fee

In exchange for site constraints and/or the limited ability to plant new trees on-site, the applicant shall offset the loss of Heritage/street tree(s) with a replacement fee made payable to the City of Mountain View, based on the adopted fee schedule. The fee must be paid prior to building permit issuance.

PL-198 Preconstruction Nesting Bird Survey

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

The applicant shall be responsible for the retention of a qualified biologist to conduct a survey of the project site and surrounding 500' for active nests—with particular emphasis on nests of migratory birds—if construction (including site preparation) will begin during the bird nesting season, from February 1 through August 31. If active nests are observed on either the project site or the

surrounding area, the applicant, in coordination with the appropriate City staff, shall establish no-disturbance buffer zones around the nests, with the size to be determined in consultation with the California Department of Fish and Wildlife (usually 100' for perching birds and 300' for raptors). The no-disturbance buffer will remain in place until the biologist determines the nest is no longer active or the nesting season ends. If construction ceases for two days or more and then resumes during the nesting season, an additional survey will be necessary to avoid impacts on active bird nests that may be present.

PL-199 Burrowing Owl Habitat Area

This project is located in the habitat area of burrowing owls, a protected Special Status species under the Endangered Species Act. Any construction activity in this area shall be performed carefully and with attention to any ground disturbances, exterior lighting, and operations of mechanical or construction equipment which may impact the species. During construction activity, if a burrowing owl is present within 250' of the site, then no disturbances or construction activity may occur that would cause the owl to abandon their burrow or nest. Additionally, the California Department of Fish and Wildlife (CDFW) must be contacted immediately and a safety plan will need to be developed and approved by CDFW to determine the impacts the project may have on the owl(s). Construction activity must cease during this period.

PL-200 Aquatic Best Management Practices (BMP) Construction Measures

- Work within the bed and banks of Permanente Creek should be conducted during the dry season (April 15 through October 31) when streamflow is lowest and there is little potential for stormwater to carry soil or other materials into the creek.
- Straw wattles (fiber rolls) or silt fencing would be placed along the boundary of the work area, between the work area and wetted portions of the Permanente Creek, as well as at catch basin inlets according to the project Stormwater Pollution Prevention Plan (SWPPP) that would be prepared to avoid excess sediment discharge.
- The creek shall be dewatered prior to and for the duration of any earthwork or ground-disturbing activities within the wetted areas of Permanente Creek using appropriately sized pipes for dry-season flows.
- No work shall occur within the bed and banks of Permanente Creek during rain events.
- No litter, debris, or sediment shall be dumped into storm drains. Work crews shall be educated about the impacts of trash in sensitive habitats. Enclosed trash containers shall be provided, and trash and debris shall be removed from the site daily.
- Vehicles and equipment will be driven only on established roads and crossings. Routes and boundaries will be clearly marked and will be located outside of the driplines of preserved trees.
- Equipment shall be staged and vehicles shall be parked only on established access roads and flat surfaces.
- The integrity and effectiveness of construction fencing and erosion control measures shall be inspected daily. Corrective actions and repairs shall be carried out immediately for fence breaches and ineffective BMPs.

PL 201 Vibration Best Management Practices Construction Measures

- Avoid impact pile driving and drill piles instead where possible. Drilled piles cause lower vibration levels where geological conditions permit their use.
- Avoid using vibration rollers and tampers near sensitive areas.
- In areas where project construction is anticipated to include vibration generating activities, vibration studies shall be conducted to determine the areas of impact and to present appropriate mitigation measures that may include the following:
  - Identification of sites that would be exposed to project vibration compaction activities and could result in vibration impacts to structures;
  - Develop a vibration monitoring and contingency plan;
  - Construction contingency plan; and
  - Conduct post-survey on structures where either monitoring has indicated high levels or complaints of damage have been made.FEP-03 State of California Construction General Stormwater Permit

A "Notice of Intent" (NOI) and "Stormwater Pollution Prevention Plan" (SWPPP) shall be prepared for construction projects disturbing one (1) acre or more of land. Proof of coverage under the State General Construction Activity Stormwater Permit shall be attached to the building plans.

FEP-04 Construction Best Management Practices

All construction projects shall be conducted in a manner which prevents the release of hazardous materials, hazardous waste, polluted water, and sediments to the storm drain system.

FEP-05 Construction Sediment and Erosion Control Plan

The applicant shall submit a written plan acceptable to the City which shows controls that will be used at the site to minimize sediment runoff and erosion during storm events. The plan should include installation of the following items where appropriate: (a) silt fences around the site perimeter; (b) gravel bags surrounding catch basins; (c) filter fabric over catch basins; (d) covering of exposed stockpiles; (e) concrete washout areas; (f) stabilized rock/gravel driveways at points of egress from the site; and (g) vegetation, hydroseeding, or other soil stabilization methods for high-erosion areas. The plan should also include routine street sweeping and storm drain catch basin cleaning.

FEP-15 Vehicle/Equipment Fueling Facilities

Vehicle or equipment fueling facilities shall be designed to prevent the run-on of stormwater and runoff of spills by all of the following: (a) paving the area with concrete or other nonpermeable surface; (b) covering the area and extending the cover at least 10' beyond the fuel pumps in the directions of vehicle or equipment access and egress; (c) sloping the area inward (negative slope) or installing a berm or curb around its perimeter; and (d) roof drainage shall be directed outside of the fueling pad area located underneath the canopy. No roof drainage shall flow across the covered fueling pad area. There shall be no storm drains in the fueling area.

FEP-16 Outdoor Vehicle/Equipment Maintenance

Outdoor equipment or vehicle maintenance areas (excluding washing) shall be designed to prevent the run-on of stormwater and runoff of spills by all of the following: (a) paving the area with

concrete or other nonpermeable surface; (b) covering the area; and (c) sloping the area inward (negative slope) or installing a berm or curb around its perimeter. There shall be no storm drains in the maintenance area.

FEP-17 Outdoor Vehicle/Equipment Washing Facilities

Outdoor vehicle/equipment washing areas shall be designed to prevent the run-on of stormwater and runoff of spills by all of the following: (a) paving the area with concrete or other nonpermeable surface; (b) sloping the area inward (negative slope) or installing a berm or curb around its perimeter; (c) installing a roof over the wash pad area; and (d) discharging the wash water to an approved wastewater treatment system connected to the sanitary sewer.

FEP-18 Hazardous Materials/Waste Loading Docks

Loading docks used for hazardous materials or hazardous waste shipping/receiving shall be designed to prevent the run-on of stormwater and runoff of spills by all of the following: (a) paving the dock with concrete or other nonpermeable surface; (b) covering the dock or installing a rain sensor which automatically opens the storm drain in the dock; and (c) sloping the dock inward (negative slope) or installing a berm or curb around its perimeter. There shall be no storm drains in the loading docks unless they are normally in the closed position and interlocked to open when triggered by the rain sensor.

FEP-19 Outdoor Storage Areas (Including Garbage Enclosures)

Outdoor storage areas (for storage of equipment or materials which could decompose, disintegrate, leak, or otherwise contaminate stormwater runoff), including garbage enclosures, shall be designed to prevent the run-on of stormwater and runoff of spills by all of the following: (a) paving the area with concrete or other nonpermeable surface; (b) covering the area; and (c) sloping the area inward (negative slope) or installing a berm or curb around its perimeter. There shall be no storm drains in the outdoor storage area.

FEP-20 High-Erosion Storage Areas

High-erosion areas (areas paved with loose sand/gravel, areas used for storage of high-sediment-producing materials, such as rock or sand, or areas designated for high traffic or heavy equipment traffic) shall be designed to prevent the run-on of stormwater and runoff of spills by one of the following: (a) covering the area and either sloping the area inward (negative slope) or providing a berm or curb around its perimeter; or (b) retrofitting the area with a treatment system to intercept and remove sediments from storm drain runoff.

4.3.3 Impact Analysis

Methodology and Significance Thresholds

Methodology

The project's impacts related to special-status species, sensitive natural communities, potential jurisdictional areas and other protected biological resources are evaluated based on the project's adherence to local, state, and federal requirements; current conditions and level of existing development, construction activities, the change in land use and proposed operational activities; and the nature of proposed development and its potential to effect sensitive biological resources.

The potential for biological resources in this analysis is based on a desktop review of aerial imagery, existing background documents, and agency database queries, including the CNDDB (CDFW 2025b), IPaC (USFWS 2024b), and the Inventory of Rare and Endangered Plants of California (CNPS 2025a).

Significance Thresholds

To determine whether a project would result in a significant impact to Biological Resources, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

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

Project Impacts and Mitigation Measures

This analysis focuses on impacts associated with implementation of the Proposed Project which would change the multifamily residential zoning code in Mountain View described in Chapter 2, *Project Description*.

Threshold 1:	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?

Impact BIO-1 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT MAY RESULT IN DIRECT OR INDIRECT IMPACTS TO SPECIAL-STATUS SPECIES OR THEIR ASSOCIATED HABITATS, AS WELL AS IMPACTS TO NESTING BIRDS. HOWEVER, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Special-status species are those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the USFWS and/or the CDFW, as well as CDFW species of special concern and fully protected species. The NOAA has designated Stevens Creek from Stevens Creek Reservoir to the San Francisco Bay as critical habitat for Central California Coast Steelhead, and USFWS has proposed critical habitat for monarch within the City of Mountain View (NOAA 2025, USFWS 2024).

Based on the definitions regarding potential for occurrence provided in Section 4.3.1.C, there would be no impact or less-than-significant impacts to species that are not expected to occur or that have a low potential to occur in the Project disturbance area; therefore, these species are not discussed further in this document. For the nine species with a moderate potential to occur in the Project disturbance area, Standard COAs and mitigation measures are included in this section that would reduce potentially significant impacts to less-than-significant levels.

Future development projects would also be subject to state and federal laws, regulations, and management policies regarding biological resources (e.g., federal and state Endangered Species Acts).

While there is potential for some special-status plant and wildlife species to occur in portions of the City of Mountain View, development facilitated by the Proposed Project would mostly occur on sites that have already been developed, or infill sites that are surrounded by development. As such, most of the Project disturbance area does not contain native or natural habitat types. However, trees, shrubs, man-made structures, and the ground surface all provide suitable nesting substrates for birds protected under the MBTA and CFGC.

Native nesting birds. Construction of specific development projects implemented under the Proposed Project that occur during the breeding season may impact native nesting birds. Impacts may include direct impacts to active nests, including damage to eggs or injury or death to young and adults due to crushing by heavy equipment or removal of nests. Indirect impacts may result if noise, vibration, artificial lighting, and human presence cause adult birds to abandon nests for prolonged periods of time, preventing them from incubating eggs, brooding chicks, and defending the nest from predators.

The following City of Mountain View standard COA (Mountain View 2022), described above in Section 4.3.2, *Regulatory Setting*, would be applicable to development facilitated by the Proposed Project and would reduce potential impacts related to nesting birds:

- **PL-198 Preconstruction Nesting Bird Survey**

The City of Mountain View applies Standard COAs, described above, to development projects. The COAs would be required for each project. With implementation of COAs, construction-related noise and vibration that would cause birds to abandon nests, and demolition of buildings and tree removal that could injure or cause mortality of individual birds would be avoided and/or minimized. The Standard COA requires a preconstruction survey and buffers around active nests, and construction-related impacts to native nesting birds in and around the Project area would be minimized, and the resulting impact would be less than significant.

In addition to potential impacts to nesting birds, future development in the Proposed Project area has the potential to affect special-status species that have a moderate potential to occur in the Project area, including:

- western red bat
- Crotch's bumble bee
- burrowing owl
- northwestern pond turtle
- monarch
- steelhead
- California red-legged frog

Crotch's bumble bee. There are three documented occurrences of Crotch's bumble bee in urban and creek areas within 3 miles of the Project area. Suitable habitat for this species includes parks,

undeveloped areas, annual grassland, landscaped areas, and creek corridors that contain suitable nesting and overwintering habitat and floral resources for foraging.

The Proposed Project has the potential to adversely affect Crotch's bumble bees that may be present in the Project area through the removal of nesting and overwintering habitat, removal or crushing of floral resources, and disturbance of nests during construction and other project activities. Direct mortality of Crotch's bumble bees would be a significant impact. Potential project-related impacts to Crotch's bumble bees would be minimized to a less-than-significant level with the implementation of Mitigation Measure BIO-1, which would require a Biological Resources Screening and Assessment, if determined necessary based on preliminary review conducted by City staff, to determine whether development facilitated by the Project within undeveloped parcels would impact special-status species, including state or federally listed species. If the Biological Resources Screening and Assessment determines there is potential for listed species, Mitigation Measure BIO-2 would require protocol level species habitat assessments and surveys, and BIO-3 would require avoidance. With the incorporation of these mitigation measures, construction-related impacts to Crotch's bumble bees nesting, overwintering, or foraging in and around the Project area would be minimized and the resulting impact would be less than significant.

Burrowing owl. There are 14 documented occurrences of burrowing owls in urban, agricultural, and park areas within 3 miles of the Project area. Suitable habitat for this species includes undeveloped and developed urban and park areas with low-growing vegetation, as well as annual grassland in the Project area.

The Proposed Project has the potential to adversely affect burrowing owls that may be present in the Project area through the removal of suitable habitat and disturbance during project activities. Direct and indirect mortality of burrowing owls would be a significant impact.

The following City of Mountain View standard COA (Mountain View 2022), described above in Section 4.3.2, *Regulatory Setting*, would be applicable to development facilitated by the Proposed Project and would reduce potential impacts related to burrowing owls:

- **PL-199 Burrowing Owl Habitat Area**

The City of Mountain View applies Standard COAs, described above, to development projects. The COAs would be required for each Project. With implementation of applicable COAs, construction-related noise that would cause burrowing owls to abandon active nests, and grading and demolition of buildings could injure or cause mortality of individual owls would be avoided and/or minimized. The Standard COA requires construction to cease if a burrowing owl is present within 250' of the site, and CDFW to be contacted to determine next steps. With implementation of the Standard COA, construction-related impacts to burrowing owls in and around the Project area would be minimized and the resulting impact would be less than significant.

Northwestern pond turtle. There are three documented occurrences of northwestern pond turtles in Mountain View, the closest of which is in Stevens Creek near U.S. 101. Northwestern pond turtles are known to nest up to 350 feet from aquatic habitats; however, due to the developed nature of the Project area, nesting habitat is limited to upland areas immediately adjacent to (within 100 feet of the top of bank of) Stevens Creek.

The Proposed Project has the potential to adversely affect northwestern pond turtles that may be present in the Project area through the disturbance of upland habitat that is near suitable aquatic habitat in the Project area and indirect impacts to water quality due to runoff that would cause siltation of aquatic habitat and potential hazardous materials spills. Direct and indirect mortality of

northwestern pond turtles would be a significant impact if they become listed under the ESA. Potential project-related impacts to northwestern pond turtles would be minimized to a less-than-significant level with the implementation of Mitigation Measure BIO-1 which would require a Biological Resources Screening and Assessment, if determined necessary based on preliminary review conducted by City staff, to determine whether development facilitated by the Project within undeveloped parcels would impact special-status species, including state or federally listed species. If the Biological Resources Screening and Assessment determines there is potential for listed species, Mitigation Measure BIO-2 would require protocol level species habitat assessments and surveys, and BIO-3 would require avoidance. With the incorporation of these mitigation measures, construction-related impacts to northwestern pond turtles in and around the Project area would be minimized and the resulting impact would be less than significant.

Monarch. There are no CNDDB documented occurrences of monarchs within the 9-quad search area; however, there are numerous observations of this species documented in iNaturalist, which is a citizen science project, in developed portions of the city and along Stevens Creek. Native milkweed plants, which are the host plant for monarch reproduction, are known to occur in and adjacent to the Project area. Suitable habitat that may support floral resources for foraging includes undeveloped areas, creek corridors, and annual grasslands. Developed parcels in the Project area consist of maintained urban landscaping that generally lack native vegetation and other habitat features required for monarch breeding. Because these sites do not provide functional host plants or stable microhabitat conditions, the likelihood of monarch eggs or caterpillars occurring is low, supporting a less-than-significant impact conclusion for developed sites.

Should monarchs become listed under the ESA, the Proposed Project has the potential to adversely affect monarchs that may be present in the Project area through the removal or crushing of milkweed plants that may contain monarch eggs or larvae during project activities. Direct mortality of monarchs would be a significant impact. Potential project-related impacts to monarchs would be minimized to a less than significant level with the implementation of Mitigation Measure BIO-1 which would require a Biological Resources Screening and Assessment where they are more likely to occur, if determined necessary based on preliminary review conducted by City staff, to determine whether development facilitated by the Project within undeveloped parcels would impact special-status species, including state or federally listed species. If the Biological Resources Screening and Assessment determines there is potential for listed species, Mitigation Measure BIO-2 would require protocol level species habitat assessments and surveys, and BIO-3 would require avoidance. With the incorporation of these mitigation measures, construction-related impacts to monarchs in and around the Project area would be minimized and the resulting impact would be less than significant.

Steelhead. Central California coast (CCC) steelhead are known to occur in Stevens Creek as recently as 2021 (Valley Water 2021). In addition, recent restoration projects in the creek would allow steelhead to access natal spawning areas upstream of the Project area (SCVWD 2025).

The Proposed Project has the potential to adversely affect CCC steelhead that may be present in Stevens Creek through the disturbance of aquatic habitats during project activities that would cause barotrauma (physical injuries resulting from significant differences between the pressure on the body's internal air-filled spaces and the surrounding environment), water quality impacts, or other significant effects to steelhead. Direct and indirect mortality of CCC steelhead would be a significant impact.

The following City of Mountain View standard COAs (Mountain View 2022), described above in Section 4.3.2, *Regulatory Setting*, would be applicable to development facilitated by the Proposed Project and would reduce potential impacts related to special-status bat species:

- **PL-200 Aquatic Best Management Practices (BMP) Construction Measures**
- **PL 201 Vibration Best Management Practices Construction Measures**
- **FEP-05 Construction Sediment and Erosion Control Plan**
- **FEP-15 Vehicle/Equipment Fueling Facilities**
- **FEP-16 Outdoor Vehicle/Equipment Maintenance**
- **FEP-17 Outdoor Vehicle/Equipment Washing Facilities**

The City of Mountain View applies Standard COAs, described above, to development projects. The COAs would be required for each project. With implementation of applicable COAs, construction-related vibration that would cause barotrauma to steelhead and sedimentation of aquatic steelhead habitat that could cause mortality to individual steelhead would be avoided and/or minimized. Standard COAs would require impact pile driving to be avoided where possible, avoid the use of vibration rollers and tampers near sensitive habitat areas, and vibration studies to be conducted to determine the areas of impact and to present appropriate mitigation measures to avoid and minimize impacts to steelhead, as well as implementation of measures to avoid sedimentation and hazardous materials from entering aquatic habitats. With implementation of Standard COAs, construction-related impacts to CCC steelhead in and adjacent to the Project area would be minimized and the resulting impact would be less than significant.

California red-legged frog. California red-legged frog is known to occur in Permanente Creek south of the Project area. Stevens Creek within the Project area may support California red-legged frog. Undeveloped upland parcels adjacent to (within 100 feet of) Stevens Creek could also support aestivation sites and dispersal corridors for this species. There are five recently documented CNDDB occurrences of this species within 3 miles of the Project area from 2006-2022. The closest of these occurrences was approximately 1 mile from the Project area.

The Proposed Project has the potential to adversely affect California red-legged frogs that may be present in the Project area through crushing individual frogs or burrows adjacent to suitable aquatic habitat, as well as indirect impacts to water quality due to runoff that would cause siltation of aquatic habitat and potential hazardous materials spills. Direct and indirect mortality of California red-legged frogs would be a significant impact. Potential project-related impacts to California red-legged frogs would be minimized to a less-than-significant level with the implementation of Mitigation Measure BIO-1 which would require a Biological Resources Screening and Assessment, if determined necessary based on preliminary review conducted by City staff, to determine whether development facilitated by the Project within undeveloped parcels would impact special-status species, including state or federally listed species. If the Biological Resources Screening and Assessment determines there is potential for listed species, Mitigation Measure BIO-2 would require protocol level species habitat assessments and surveys, and BIO-3 would require avoidance. With the incorporation of these mitigation measures, construction-related impacts to California red-legged frogs in and around the Project area would be minimized and the resulting impact would be less than significant.

Mitigation Measures

The following mitigation measures are required.

BIO-1 Biological Resources Screening and Assessment

For development facilitated by the R3 Zoning District Update on undeveloped parcels within 200 feet of a riparian corridor or top of bank, or undeveloped natural area, prior to construction activities and if determined necessary based on preliminary review conducted by City Staff, the City shall require project applicants to engage a qualified biologist (having the appropriate education and experience level) to perform a baseline Biological Resources Screening and Assessment to determine whether the project would have the potential to impact special-status biological resources, inclusive of special-status plants and animals, sensitive vegetation communities (including vernal pools and other wetlands), and critical habitat. If it is determined that the project has no potential to impact biological resources, no further action is required. If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 500 feet around the project footprint, as is feasible, and to determine the potential impacts to those resources. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special-status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, state, and/or federal agencies. If the project would have the potential to impact these resources, the following mitigation measures (Mitigation Measures BIO-2 and BIO-3) shall be incorporated, as applicable, to reduce impacts to a less than significant level. Pending the results of the project-specific biological analysis, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, CDFW, and/or other local, state, and federal agencies may be required. Note that specific surveys described in the mitigation measures below may be completed as part of the project-specific biological analysis where suitable habitat is present.

BIO-2 Endangered/Threatened Special-status Species Habitat Assessments and Protocol Surveys

For development facilitated by the R3 Zoning District Update where the Project-specific biological analysis (Mitigation Measure BIO-1) determines that suitable habitat may be present for federal- or state-listed, candidate, or proposed species, the City shall require protocol habitat assessments/surveys be completed in accordance with current CDFW and/or USFWS protocols prior to issuance of any construction permits. If, through consultation with the CDFW and/or USFWS, it is determined that protocol habitat assessments/surveys are not required, the project applicant shall be required to complete and document this consultation and submit it to the City prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they understand the protocol requirements and shall hire a qualified biologist to conduct protocol surveys. (Note: if a federally and/or state-listed wildlife species will be impacted, federal and/or state take authorization may be required by USFWS and CDFW.)

BIO-3 Endangered/Threatened Animal Species Avoidance and Minimization

For development facilitated by the R3 Zoning District Update where potential impacts to aquatic and/or terrestrial animal species are identified by the project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1, the following measures shall be applied.

1. Ground disturbance shall be limited to the minimum necessary to complete the project. A qualified biologist shall flag the project limits of disturbance. Areas of special biological concern

within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance.

2. All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and October 31, if feasible, to avoid impacts to sensitive aquatic species. Any work outside these dates would require project-specific approval from the City and may be subject to regulatory agency approval.
3. All projects occurring within or adjacent to sensitive habitats that may support federally and/or state-listed endangered/threatened species shall have a CDFW- and/or USFWS-approved biologist present during all initial ground disturbing/vegetation clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed, said biologist shall conduct daily pre-activity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the CDFW and/or USFWS, said biologist may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are fully implemented.
4. No endangered/threatened species shall be captured and relocated without express permission from the CDFW and/or USFWS.
5. If at any time during project construction an endangered/threatened species enters the construction site or otherwise may be impacted by the project, all project activities shall cease. A CDFW/USFWS-approved biologist shall document the occurrence and consult with the CDFW and USFWS, as appropriate, to determine whether it was safe for project activities to resume.
6. For all work occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete.
7. All vehicle maintenance/fueling/staging shall occur not less than 100 feet from any riparian habitat or water body, including seasonal wetland features. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies.
8. No equipment shall be permitted to enter wetted portions of any affected drainage channel or wetland.
9. At the end of each workday, excavations shall be secured with a cover or a ramp provided to prevent wildlife entrapment.
10. All trenches, pipes, culverts, or similar structures shall be inspected for animals prior to burying, capping, moving, or filling.
11. Considering the potential for the project to impact federally and state-listed species and their habitat, the City shall contact CDFW and USFWS to identify mitigation banks within Santa Barbara County during project development. If the results of the project-specific biological analysis (Mitigation Measure BIO-1) determine that impacts to federally and state threatened or endangered species habitat are expected, City and/or applicant shall explore species-appropriate mitigation bank(s) servicing the region for purchase of mitigation credits.

12. Prior to grading and construction in natural areas of containing suitable upland habitat, a qualified biologist shall conduct a preconstruction survey as determined necessary during the biological analysis (Mitigation Measure BIO-1). The survey should include a transect survey over the entire project disturbance footprint (including access and staging areas), and mapping of suitable habitat features, such as burrows, that are potentially suitable for listed species. If any listed species are detected, no work shall be conducted until the individual(s) leaves the site of their own accord, unless federal and/or state "take" authorization has been issued for relocation. Typical preconstruction survey procedures, such as burrow scoping and burrow collapse, cannot be conducted without federal and state permits. If any life stage of listed species are found within the survey area, the City and/or applicant shall consult with the USFWS and CDFW to determine the appropriate course of action to comply with the FESA and CESA, if permits are not already in place at the time of construction.

Significance After Mitigation

Implementation of Mitigation Measures BIO-1 through BIO-3 would reduce potential impacts to sensitive species to a less than significant level.

Threshold 2:	Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
Threshold 3:	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?
Threshold 4:	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?

Impact BIO-2 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT MAY DIRECTLY OR INDIRECTLY IMPACT RIPARIAN HABITAT AND/OR PROTECTED WETLANDS. HOWEVER, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The proposed Zoning Districts are located within 100 feet of Permanente Creek and Stevens Creek, with some Zoning Districts overlapping with the creeks (R2, R3-B, R3-C R3-D1, R3-D2), and one Zoning District includes a freshwater pond (R3-D2). Therefore, riparian habitat may be present in these sites and common and special-status wildlife and plant species that may use urban or urban-adjacent areas could be present at the time of development. Further, the creeks could provide a local movement corridor for fish and other common aquatic species, as well as upland species that may travel along the banks of the creeks, and construction activities from future development could potentially result in impacts to wildlife movement.

The Project area is not recognized as an important wildlife corridor by any regional or state agency or jurisdiction and is not critical to the ecological functioning of adjoining open space areas (CDFW 2025). Due to the developed nature of the Project area and high level of human disturbance throughout the city, common wildlife species that have adapted to urban areas like raccoon (*Procyon lotor*) and Virginia opossum (*Didelphis virginiana*) are likely to occur throughout the Project area, but large-scale annual migratory wildlife use is unlikely.

Compliance with existing regulations would ensure future development would not remove, fill, hydrologically interrupt, or otherwise directly affect the creeks, ponds, and riparian vegetation. Future development projects would be subject to state and federal laws, regulations, and management policies regarding aquatic resources (e.g., sections 404 and 401 of the federal and state Clean Water Acts and Section 1602 of the California Fish and Game Code). Future development projects would be reviewed to determine whether their impacts fall within the scope of this EIR, or if additional site-specific environmental review will be required. Further, due to the developed nature of the sites, impacts related to local wildlife movement would be less than significant.

Where aquatic habitats are present adjacent to a site (i.e. within 100 feet), implementation of the following COAs would be required to prevent runoff and sediment from entering aquatic habitats.

- **PL-200 Aquatic Best Management Practices (BMP) Construction Measures**
- **FEP-05 Construction Sediment and Erosion Control Plan**

In accordance with the Mountain View General Plan EIR, the SCVWD has a primary role in protecting wetlands and watersheds in the Mountain View area. Action INC 16.1.3 would foster cooperation between the City and SCVWD to achieve this goal through implementation of the Santa Clara Valley Water Resources Protection Collaborative Guidelines and Standards for Land Use Near Streams. Development of small parcels may impact small seasonal wetlands or drainage ditches potentially subject to federal jurisdiction. However, implementation of Policy LUD 10.2 (encourage development to minimize or avoid disturbing natural resources and ecologically significant land features) will ensure that impacts to such features, if present, will be minimized or avoided. In addition, any such impacts would be subject to federal (Clean Water Act) and State (Porter-Cologne Water Quality Control Act) regulations and would need to be permitted if they were proposed to be filled or impacted.

Significance After Mitigation

Impacts would be less than significant. No mitigation measures are required.

Threshold 5:	Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact BIO-3 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD BE SUBJECT TO THE CITY'S POLICIES AND REQUIREMENTS PROTECTING BIOLOGICAL RESOURCES, INCLUDING PROTECTED TREES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As outlined in the Local Regulations section, the City of Mountain View has specific protections in place for both heritage and street trees, as detailed in its municipal code (Article II, Sections 32.24 – 32.29). A "heritage tree" is generally defined as any tree with a circumference of 48 inches (approximately 15.3 inches in diameter) measured 54 inches above ground level. Additionally, any oak, redwood, or cedar tree with a minimum circumference of 12 inches (or about 3.8 inches in diameter) also qualifies. Street trees refer to those situated within the public right-of-way, typically extending five feet from the back of the sidewalk or ten feet from the curb's edge (Article II, Section 32.23). Within the Proposed Project area, both heritage and street trees are present and may be removed or replaced in accordance with city regulations.

While the exact number of trees potentially affected is unclear, the Project intends to follow all applicable requirements under the City of Mountain View's Heritage Tree Ordinance, including any necessary tree replacements. Heritage trees may not be removed, relocated, or otherwise modified until a building permit has been issued, and an individual project is underway. When applicable, project applicants must submit a separate Heritage Tree Removal Permit application, which is subject to review and approval by the City. Any permit granted would include requirements for the protection, relocation, or replacement of affected trees, in alignment with City regulations. The Project would be required to comply with all permit stipulations and, therefore, such actions would not be inconsistent with local ordinances or policies. The City's Standard Conditions of Approval include the following measures related to protected trees: Landscaping, Arborist Report, Arborist Inspections, Monthly Arborist Inspections, Tree Removals, Replacement Trees, Street Tree Protections, Tree Protection Measures, Irrevocable Damage to Heritage Trees, Tree Relocation(s), Off-Site Tree Mitigation, and Tree Replacement Fee.

After the approval of the Heritage Tree Removal Permit and all associated permit conditions are met, the Project would be in compliance with local regulations regarding the protection of biological resources, including the City's Heritage Tree protection ordinance. There are no additional local policies or regulations related to biological resources that would be in conflict with the Proposed Project. As a result, the anticipated impact on biological resources would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation measures are required.

Threshold 6:	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?

Impact BIO-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN. THERE WOULD BE NO IMPACT.

The Project area is not located in the Silicon Valley Habitat Plan, the Shoreline Wildlife Management Plan, or the Shoreline Burrowing Owl Preservation Plan area and does not provide suitable habitat for the species of concern identified in the Santa Clara Valley Habitat Plan (County of Santa Clara et al., 2012; Appendix E). Thus, no impact would occur.

4.3.4 Cumulative Impacts

IMPACT BIO-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON SPECIAL-STATUS SPECIES, WOULD NOT RESULT IN A SIGNIFICANT LOSS OR DEGRADATION OF RIPARIAN HABITAT OR OTHER LOCALLY PROTECTED BIOLOGICAL RESOURCES, WOULD NOT CAUSE A CUMULATIVELY SIGNIFICANT LOSS OF JURISDICTIONAL WATERS OR WETLANDS, WOULD NOT SUBSTANTIALLY INTERFERE WITH WILDLIFE MOVEMENT, AND WOULD NOT CONFLICT WITH ADOPTED CONSERVATION PLANS. CUMULATIVE IMPACTS TO BIOLOGICAL RESOURCES WOULD BE LESS THAN SIGNIFICANT, AND THE CONTRIBUTION OF THE PROJECT WOULD NOT BE CUMULATIVELY CONSIDERABLE.

The geographic scope for cumulative biological resources impacts is the City of Mountain View. This geographic scope is appropriate for biological resources because it encompasses the mosaic of

representative land cover and habitat types (and associated biological resources) affected or potentially affected by the Proposed Project, including primarily urban, residential, and commercial development with areas of natural habitats. Cumulative buildout in this region, including projects listed in Table 3-1, would have the potential to adversely impact biological resources.

Cumulative development in Mountain View would have limited, site-specific impacts to biological resources throughout the Bay Area. Most of the R3 Zoning Districts would not result in substantial impacts to special-status species given that proposed development locations are within developed areas. Individual cumulative projects would undergo design review for compliance with applicable state and federal laws, and City and County municipal codes and ordinances, and may also undergo environmental review to mitigate impacts to the extent feasible. Cumulative impacts to special-status species (Threshold 1) would be less than significant.

Cumulative development could adversely impact riparian habitat if development would result in the introduction of invasive weedy species, removal of protected trees, or result in loss of riparian habitat. Cumulative development would be required to adhere to applicable municipal code tree removal and replacement requirements. Cumulative development would not result in a significant cumulative impact related to riparian habitat or locally protected resources (Thresholds 2 and 5).

Cumulative development could adversely impact jurisdictional waters and wetlands on individual sites where such features are present. Such cumulative development may require USACE, RWQCB, and/or CDFW permitting. However, the state's strict mitigation requirements aim to ensure no-net-loss of wetlands and would be enforced by the permitting agencies. Pursuant to compliance with these existing permitting requirements, cumulative impacts related to waters or wetlands would be less than significant (Threshold 3).

Cumulative development has the potential to interfere substantially with the movement of native resident or migratory fish or wildlife species. However, as described under Impact BIO-2, the project area does not contain significant corridors for wildlife movement. Cumulative development would not significantly change the level of existing barriers for wildlife movement in the region and cumulative impacts related to wildlife movement (Threshold 4) would be less than significant.

As described under Impact BIO-4, the project area is not located within an adopted Habitat Conservation Plan or Natural Community Conservation Plan and therefore the project would result in no impact related to conflicts with such plans. Accordingly, the project has no potential to contribute to cumulative impacts related to conflicts with approved conservation plans, and these impacts are not discussed further (Threshold 6).

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4.4 Cultural Resources

This section analyzes impacts to cultural resources that could result from implementation of the Proposed Project. Cultural resources include sites, buildings, structures, objects, districts, landmarks, and other physical markers important to our understanding of indigenous peoples or the history of Mountain View and the region. Impacts associated with tribal cultural resources are addressed in Section 4.14, *Tribal Cultural Resources*.

4.4.1 Setting

This section provides an overview of the existing conditions related to cultural resources, including historical and archeological resources as well as human remains. An ethnographic background is provided in Section 4.14, *Tribal Cultural Resources.*

Indigenous History

The City of Mountain View lies in the San Francisco Bay Area archaeological region (Milliken et al. 2007, Moratto 1984). Milliken et al. (2007) generally divided the prehistoric chronology of the Bay Area into five periods: The Early Holocene (8,000-3,500 BCE), Early Period (3,500-500 BCE), Lower Middle Period (500 BCE to CE 430 CE), the Upper Middle Period (430-1050 CE), and the Late Period (1050 CE-contact).

It is presumed that early Paleoindian groups lived in the area prior to 8,000 BCE; however, no evidence for that period has been discovered in the Bay Area to date (Milliken et al. 2007). Sites dating to this period may be submerged or deeply buried as a result of rising sea levels and widespread sediment deposition that has occurred since the Terminal Pleistocene (Byrd et al. 2017). For this reason, the Terminal Pleistocene Period (ca. 11,700-8,000 BCE) is not discussed here.

The earliest intensive study of archaeology of the San Francisco Bay Area began with N.C. Nelson of the University of California, Berkeley, between 1906 and 1908, who documented over 400 shell mounds throughout the area. Nelson was the first to identify the Bay Area as a discrete archaeological region (Moratto 1984).

Early Holocene (8000-3500 BCE)

Archaeological evidence from the early Holocene is limited as many sites dating to this period are likely buried under Holocene alluvial deposits (Moratto 1984; Ragir 1972). The available data suggest that the Early Holocene in the San Francisco Bay Area is characterized by a mobile forager pattern and the presence of millingslabs, handstones, and a variety of leaf-shaped projectile points. Two archaeological sites (CA-CCO-696 and CA-CCO-637) that date to this period have been identified in Contra Costa County at the Los Vaqueros Reservoir. The earliest date for the Early Holocene comes from the CA-CCO-696, approximately 7000 BCE (Milliken et al. 2007).

Early Period (3500-600 BCE)

The Early Period saw increased sedentism with the introduction of new ground stone technologies (i.e., mortar and pestle), an increase in regional trade, and the first cut shell beads. The earliest evidence for the use of the mortar and pestle dates to 3800 BCE and comes from CA-CCO-637. By 1500 BCE, mortars and pestles had almost completely replaced millingslabs and handstones. The advent of the mortar and pestle indicates a greater reliance on processing nuts, especially acorns.

Faunal evidence from various sites indicates a diverse faunal exploitation pattern based on mussel and other shellfish, marine mammals, terrestrial mammals, and birds (D'Oro 2009).

The earliest cut bead horizon is also associated with this period. Rectangular *Haliotis* spp. (abalone) and Olivella *(Callianax biplicata,* snail*)* beads have been identified at several Early Period sites, including CA-CCO-637, CA-SCL-832 in Sunnyvale, and CA-ALA-307 in Berkeley (Milliken et al. 2007). These early examples of cut beads were recovered from mortuary contexts.

Lower Middle Period (500 BCE-430 CE)

The Lower Middle Period saw numerous changes from the previous period. The presence of chipped stone points and bone tools became typical. Rectangular shell beads, common during the Early Period, disappear completely and are replaced by split-beveled and saucer Olivella beads. In addition to the changes in beads, *Haliotis* spp. ornaments, bone tools and ornaments, and basketry awls also became typical, indicating the development of coiled basketry technology. Mortars and pestles continued to be the dominant grinding tool (Luby and Gruber 1999; Milliken et al. 2007).

Evidence for the Lower Middle Period in the Bay Area comes from sites such as the Emeryville shell mound (CA-ALA-309) and Ellis Landing (CA-CCO-295). CA-ALA-309 is one of the largest shell mounds in the Bay Area and contains multiple cultural sequences. The lower levels of the site, which date to the Middle Period, contain flexed burials with bone implements, chert bifaces, charmstones, and oyster shells (Moratto 1984).

Upper Middle Period (430-1050 CE)

Around 430 CE, Olivella saucer bead trade networks that had been established during earlier periods collapsed and over half of known sites occupied during the Lower Middle Period were abandoned. Olivella saucer beads were replaced with Olivella saddle beads. New types of material culture appear within these sites, including elaborate, decorative blades, fishtail charmstones, new Haliotis ornament forms, and mica ornaments. Sea otter bones became more abundant, while salmon and other fish became less abundant, suggesting changes in faunal exploitation patterns from earlier periods (Milliken et al. 2007; Simons and Carpenter 2009). Excavations at CA-ALA-309 indicate that a shift from mussels to oysters to clams may have occurred (Gifford 1916), and isotopic analysis confirms that San Francisco Bay individuals shifted from hunting higher-trophic-level foods in the Early Period to gathering foods like plants and shellfish in the Middle and Upper Periods (Burns et al. 2012). Subsistence analyses at various sites dating to this period indicate a diverse diet that included numerous species of fish, mammals, birds, shellfish, and plant resources that varied by location in the Bay Area (Hylkema 2002).

Late Period (1050 CE-contact)

The Late Period saw an increase in social complexity, indicated by differences in burials and an increased level of sedentism relative to preceding periods, as evidenced by mortars weighing up to 90.7 kg (Lentz 2012:198). An increase in imported Napa Valley obsidian occurred during this time for the production of smaller points, preforms and simple flake tools. Small, finely worked projectile points of the Stockton Serrated series associated with bow and arrow technology appear around 1250 CE. Olivella shell beads disappeared and were replaced with Olivella lipped and spire -lopped beads in the south bay and clamshell disk beads in the north bay, where thicker and larger beads indicated higher affluence. The toggle harpoon, hopper mortar, and magnesite tube beads also appeared during this period (Milliken et al. 2007; Lentz 2012; Von Der Porten et al. 2014). This period saw an increase in the intensity of resource exploitation that correlates with an increase in

population (Moratto 1984). Many of the well-known sites of earlier periods, such as the Emeryville shell mound (CA-ALA-309) and the West Berkeley site (CA-ALA-307), were abandoned, as indicated by the lack of Late Period elements. Researchers have suggested that the abandonment of these sites may have resulted from fluctuating climates and drought that occurred throughout the Late Period (Lightfoot and Luby 2002).

Post-Contact History

Post-Contact history for the State of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican-American War, signals the beginning of the American Period when California became a territory of the United States.

Spanish Period (1769–1822)

Spanish exploration of California began when Juan Rodriguez Cabrillo led the first European expedition into the region in 1542. For more than 200 years after his initial expedition, Spanish, Portuguese, British, and Russian explorers sailed the California coast and made limited inland expeditions, but they did not establish permanent settlements (Kyle 2002).

By the 18th century, Spain developed a three-pronged approach to secure its hold on the territory and counter against other foreign explorers. The Spanish established military forts known as presidios, as well as missions and pueblos (towns) throughout Alta California. The 1769 overland expedition by Captain Gaspár de Portolá marks the beginning of California's Historic period, occurring just after the King of Spain installed the Franciscan Order to direct religious and colonization matters in assigned territories of the Americas. Portolá established the Presidio of San Diego as the first Spanish settlement in Alta California in 1769. Franciscan Father Junípero Serra also founded Mission San Diego de Alcalá that same year, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823. In 1776, the Spanish had founded Mission San Francisco de Asís, thereby establishing a foothold in what is now the San Francisco Bay Area. The mission and presidio relied on Indian labor (Kyle 2002). Construction of missions and associated presidios was a major emphasis during the Spanish Period in California to strengthen Spanish colonial power and integrate the Native American population into Christianity and communal enterprise. Incentives were also provided to bring settlers to pueblos or towns; just three pueblos were established during the Spanish Period, only two of which were successful and remain as California cities (San José and Los Angeles).

Spain began making land grants in 1784, typically to retiring soldiers, although the grantees were only permitted to inhabit and work the land. The land titles technically remained property of the Spanish king (Livingston 1914). In 1820 Rancho San Antonio was transferred to Luís María Peralta by Pablo Vicente de Solá, the last Spanish governor of Alta California. Spanish control resulted in the subjugation of indigenous peoples and disruption of their traditional ways of life. The rancho encompassed modern-day Piedmont, in addition to parts of what is now Oakland and Berkeley (Kyle 2002).

Mexican Period (1822–1848)

Several factors kept population growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and resistance among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants (Gutierrez and Orsi 1998).

Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos. Commonly, former soldiers and well-connected Mexican families were the recipients of these land grants, which now included the title to the land (Graffy 2010).

During the supremacy of the ranchos (1834–1848), landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of nonnative inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants. The rising California population contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities.

American Period (1848–Present)

The United States went to war with Mexico in 1846. The war ended in 1848 with the Treaty of Guadalupe Hidalgo, ushering California into its American Period.

California's first Constitutional Convention met for thirty-seven days in Monterey, from September 1 to October 13, 1849. The constitution, written in both English and Spanish, was approved by the delegates on October 10 to 11, 1849 and ratified by the electorate one month later. California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as U.S. territories (Waugh 2003). Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the southern California economy through 1850s. The discovery of gold in the northern part of the State led to the Gold Rush beginning in 1848, and with the influx of people seeking gold, cattle were no longer desired mainly for their hides but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros drove large herds from southern to northern California to feed that region's burgeoning mining and commercial boom.

A severe drought in the 1860s decimated cattle herds and drastically affected rancheros' source of income. In addition, property boundaries that were loosely established during the Mexican era led to disputes with new incoming settlers, problems with squatters, and lawsuits. Rancheros often were encumbered by debt and the cost of legal fees to defend their property. As a result, much of the rancho lands were sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944). Native American people continued to be displaced from their homes on land in growing urban centers, rural areas used for cattle farming, and mining areas.

City of Mountain View

The following is excerpted from the City of Mountain View's draft Historic Context Statement (Page and Turnbull 2024):

> The early twentieth century was a time of continued expansion and diversity for Mountain View, with distinct ethnic and religious enclaves in place by the 1920s, particularly Seventhday Adventists along the city's western periphery surrounding the Pacific Press Publishing Company complex; Japanese along View Street; and Mexicans in the Castro City and Frog Pond neighborhoods. Large numbers of Filipino, Spanish, Eastern European, Italian, and Portuguese immigrants continued to arrive for work in Mountain View's agricultural jobs. In 1923, Mountain View's first city park was established on Castro Street near City Hall. In 1924, Mountain View Union High School, designed by renowned California architect William H. Weeks in the Mission style, opened on Castro Street.14 The Great Depression (1929-1939) stifled Santa Clara Valley's agriculture-export economy, with fruit deemed an unnecessary luxury, and halted most new construction in downtown Mountain View. Nearby Moffett Naval Air Station was established in 1933 and the National Advisory Committee for Aeronautics' (NACA) Ames Research Center in 1939, attracting an educated and diverse workforce. The construction and operation of these two federal facilities provided hundreds of Mountain View residents with much-needed jobs as the Great Depression wore on. However, the city was divided in the early years of World War II when Japanese citizens were sent to internment camps for the duration of the war, many to remain in the Central Valley instead of returning to the Bay Area.
>
> The City of Mountain View's jagged southern boundary resulted from various annexations following the incorporation of the neighboring City of Los Altos in 1952. In 1956, controversial inventor William Shockley established the first silicon-device research and manufacturing laboratory in an old apricot barn on San Antonio Road, signaling the pivot of Mountain View industry from agriculture in the "Valley of Heart's Delight" to technology in "Silicon Valley." Other early technology-based innovators include GTE Sylvania, Fairchild Semiconductors, and Intel, setting the stage for the Dot-Com Boom. Mountain View of the 1960s through the 1970s saw continued conversion of orchards and farmland to tracts of single-family and multi-family housing, supporting a mushrooming population of just 6,500 in 1950 to over 54,000 by 1970, as well as office parks to support new high-tech manufacturing and research and development. 16 Simultaneously, outlying shopping malls decentralized Mountain View's historic business district, triggering a downtown redevelopment plan in the 1960s.
>
> Silicon Valley's Dot-Com Boom of the 1990s erased almost all remaining vestiges of Mountain View's agrarian past as massive technology campuses were constructed atop farmland along with experiments in New Urbanist housing developments. Use of the H-1B visa in the 1990s attracted people from Asian countries with specialized knowledge in technology fields, contributing to an ever more diverse workforce in Mountain View.17 In 1994, the Silicon Graphics Incorporated (SGI) building at 1401 North Shoreline Boulevard was converted to house the Computer History Museum, paying homage to tech- and computer-industry trailblazers, including Shockley Laboratories and Fairchild Semiconductor, while SGI's Charleston Park headquarters and many surrounding office park buildings were converted to serve as Google's global headquarters.18 In addition to the demolition of a number of notable older buildings, including the Mountain View Union High School, a number of notable building rehabilitations and reconstructions were undertaken during this period to preserve Mountain View's heritage. Major infrastructure projects included Shoreline Park and Amphitheatre and the redevelopment of Castro Street and the Civic Center.

Existing Conditions

Built Environment Resources

A review of the NRHP (2025), California Office of Historic Preservation (OHP) website (OHP 2025), Built Environment Resource Directory (BERD) for Santa Clara County, and the Mountain View Register of Historic Resources (City of Mountain View 2022a) was conducted to identify built environment resources within the project area.

The research identified 48 properties that have been listed, determined, or previously recommended eligible for listing in the NRHP, CRHR, and/or local inventory of historic resources (Table 4.4-1). All of the identified properties are located within the Proposed Project area, which consists of the entirety of the city; additionally, thirteen of the identified properties are located within the proposed R3 Zoning District Update sites as described in Chapter 2, *Project Description*.

According to the City's Draft Historic Context Statement, the City of Mountain View's Historic Preservation Ordinance (City Code Section 36.54.45) included the creation of a Register of Historic Resources. Ninety-three (93) properties were initially listed in the Mountain View Register of Historic Resources, but property owners were allowed to voluntarily remove themselves from the Register in 2005. As of September 2022, there are 45 total properties listed on the Mountain View Register of Historic Resources. Historical built environment resources have been identified through various surveys conducted for the City, including surveys for the 2004 Downtown Precise Plan Amendment, preparation of a historic context statement in 2008, and for the 2020 Downtown Precise Plan Area Historic Resources Survey Report (Page and Turnbull 2024).

Table 4.4-1 Built Environment Resources in Mountain View

Resource Name/Primary Number/Trinomial	Location	Status	Location in zoning update parcels
–	1181 Bonita Avenue	Local Register	**Within**
James Shower House	206 Bush Street	Local Register	**Within**
Bakotich House	445 Calderon Avenue	Local Register	**Within**
Willie Garliepp House	725 Calderon Avenue	Local Register	Outside
–	1560 California Street	Local Register	**Within**
–	1610 California Street	Local Register	**Within**
–	1690 California Street	Local Register	**Within**
Weilheimer Store	124 Castro Street	Local Register	Outside
Rogers Building (Mountain View Hotel) / P-43-001435	142-156 Castro Street	Local Register	Outside
Ames Building	169-175 Castro Street	Local Register	Outside
Farmers & Merchants Bank Building	201 Castro Street (also listed as 761 Villa Street)	Local Register	Outside
Mountain View Theater	228 Castro Street	Local Register	Outside
Scarpa's Meat Market	298 Castro Street	Local Register	Outside
–	251 Chiquita Avenue	Local Register	**Within**
Levin Huff House	595 Church Street	Local Register	Outside
–	2715 Diericx Drive	Local Register	Outside
–	350 Franklin Street	Local Register	Outside
–	394 Franklin Street	Local Register	Outside

Resource Name/Primary Number/Trinomial	Location	Status	Location in zoning update parcels
–	403 Hope Street	Local Register	**Within**
–	425 Hope Street	Local Register	**Within**
James Cochran House	1390 Latham Street	Local Register	Outside
–	1655 Lloyd Way	Local Register	Outside
	302 Loreto Street	Local Register	Outside
–	484 Loreto Street	Local Register	Outside
Camp House	336 Mariposa Avenue	Local Register	**Within**
–	496 Mariposa Avenue	Local Register	Outside
Sister's House	1855 Miramonte Avenue	Local Register	Outside
Mountain View Adobe / P-43-000707	157 Moffett Boulevard	Listed on NRHP and CRHR (NR#02001256); Local Register	Outside
–	372 Mountain View Avenue	Local Register	Outside
–	360 Oak Street	Local Register	Outside
–	296 Palo Alto Avenue	Local Register	Outside
–	390 Palo Alto Avenue	Local Register	Outside
–	562 Pettis Avenue	Local Register	Outside
Immigrant House	771 North Rengstorff Avenue	Local Register	Outside
–	472 South Shoreline Boulevard	Local Register	Outside
Rengstorff House / P-43-000387 / CA-SCL-381H	3070 North Shoreline Boulevard (original location 1737 Stierlin Road)	Listed on NRHP and CRHR (NR#78000778)	Outside
Walter House	1247 Springer Road	Local Register	Outside
–	1531 Tyler Park Way	Local Register	Outside
–	322 View Street	Local Register	**Within**
–	327 View Street	Local Register	Outside
–	515 Villa Street	Local Register	**Within**
Julius Weilheimer House	938 Villa Street	Listed on BERD Status code 2S: Individually determined eligible for NRHP; listed in the CRHR.	Outside
Air Base Laundry	954 Villa Street	Status code 1S:Individually listed in the NRHP; listed in the CRHR	Outside
–	1043 Villa Street	Local Register	Outside
–	1643 Villa Street	Local Register	Outside
–	1645 Villa Street	Local Register	Outside
–	1655 Villa Street	Local Register	Outside
–	1074-76 Wright Avenue	Local Register	**Within**
–	680 Yosemite Avenue	Local Register	Outside

*Source: NRHP 2025, BERD 2025, City of Mountain View 2022

The City is in the process of updating the Historic Preservation Ordinance and the City's Register of Historic Resources, which could increase the number of properties on the Register of Historic Resources from 45 to a maximum of 101 properties. The update is expected to be completed in 2026 (City of Mountain View 2025a).

In addition to the listed resources identified above, a NWIC records search conducted in 2022 for the City of Mountain View 2023 Housing Element Update EIR identified 110 historic-period buildings, seven historic-period structures, and one historic district. The resources include single-family, multi-family, commercial, industrial, educational, religious, agricultural, military, and adobe buildings, as well as railroads, water conveyance features, and utility structures. Of the identified resources with locational information listed, 34 are located within the proposed R3 Zoning District Update sites. (Appendix E).

Archaeological Resources

A review of the NRHP (2025), California Office of Historic Preservation (OHP) website (OHP 2025), Built Environment Resource Directory (BERD) for Santa Clara County, Mountain View Register of Historic Resources (City of Mountain View 2022a), the City's Draft Historic Context Statement (Page and Turnbull 2024), a Northwest Information Center (NWIC) records search, and historical and geological maps, and aerial photographs were reviewed to identify archaeological resources within the Project area.

A NWIC records search was conducted in 2022 for the City of Mountain View 2023 Housing Element Update EIR (City of Mountain View 2022b). The records search identified seven prehistoric resources and four multicomponent resources. Of these resources, three are located within the R3 Zoning District Update sites. Identified resources included burials, midden deposits, habitation debris, lithic and shell scatters, hearths, and refuse deposits. Additionally, the City's Draft Historic Context Statement identifies the Castro Mound, a shell mound previously located within the Project area. In 1894, excavations of the shell mound revealed human remains, beads, shells, and other decorative ornaments. The shell mound was considered the largest of its type in the South San Francisco Bay region; however, the shell mound was destroyed due to suburban development in 1946 (Page and Turnbull 2024).

A review of historic survey maps depict the City of Mountain View as undeveloped land primarily utilized for ranching (BLM 1865). Historic topographic maps show the initial development of the city by 1897, including major roadways and a railroad line northeast of the developing downtown area (USGS 1897). Historic topographic maps and aerial imagery show further development and expansion of the downtown area in the 1940s, while the northern and southern portions of the city remained utilized for agricultural purposes (USGS 1941, NETR 1948). Aerial imagery from the 1960s depict large residential development and major roadways (NETR 1960, 1968). Most of the city was developed by the 1980s (NETR 1980).

Based on research, it is possible that precontact and historic-period archaeological resources are present in the Project area. These resources would most likely be encountered during excavation activities in areas in proximity to historic sources of water and previous development. Additionally, extensive development does not preclude the possibility of intact archaeological deposits within the Project area (Page and Turnbull 2024; LSA Associates, Inc. 2012; City of Mountain View 2022a, 2022b; BLM 1865; NETR 1948, 1960, 1968, 1980; USGS 1897, 1941).

4.4.2 Regulatory Setting

a. Federal Regulations

National Environmental Policy Act (NEPA)

NEPA, as amended by the Fiscal Responsibility Act of 2023, P.L. 188-5, establishes the national environmental policy of the federal government and contains procedural requirements to carry out the national environmental policy. Specifically, NEPA requires federal agencies to provide a detailed statement on proposals for major federal actions significantly affecting the quality of the human environment. The purpose and function of NEPA is satisfied if federal agencies have considered relevant environmental information, and the public has been informed regarding the decision-making process. Statute 42 U.S. Code 4331(b)(4) states the congressional declaration of national environmental policy to include "preservation of important historic, cultural, and natural aspects of our national heritage."

Section 106 of the National Historic Preservation Act

The NHPA of 1966 is a landmark piece of U.S. legislation that established a national preservation program and a system of procedural protection, which encourages the identification and protection of historic and archaeological resources at the federal, state, and local levels. The NHPA also introduced Section 106 of the NHPA, which requires federal agencies to consult with the Advisory Council on Historic Preservation (ACHP) to take into account the effects of their undertakings on historic properties. The Section 106 process involves identification of significant historic resources within an Area of Potential Effects (APE); determination if the undertaking will cause an adverse effect on historic properties; and resolution of those adverse effects through execution of a Memorandum of Agreement or Programmatic Agreement (PA). Regulation 36 CFR Part 800 defines how federal agencies meet these responsibilities, and 36 CFR 800.5(a) describes the process for evaluating a project's adverse effects on historic properties. An adverse effect is found when a federal undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register of Historic Places (NRHP) in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Examples of adverse effects are provided in 36 CFR 800(a)(2) and include, but are not limited to:

- Physical destruction of or damage to all or part of the property
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68) and applicable guidelines
- Removal of the property from its historic location
- Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features
- Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization

Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

National Register of Historic Places

The NRHP was authorized by Section 101 of the National Historic Preservation Act and is the nation's official list of cultural resources identified for preservation. The NRHP documents the appearance and importance of districts, sites, buildings, structures, and objects significant in our prehistory and history. Per 36 CFR Part 60.4, a property is eligible for listing in the NRHP if it meets one or more of the following criteria:

Criterion A: Is associated with events that have made a significant contribution to the broad patterns of our history

Criterion B: Is associated with the lives of persons significant in our past

Criterion C: Embodies the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

Criterion D: Has yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, defined as follows:

Location: The place where the historic property was constructed or the place where the historic event occurred

Design: The combination of elements that create the form, plan, space, structure, and style of a property

Setting: The physical environment of a historic property

Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property

Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory

Feeling: A property's expression of the aesthetic or historic sense of a particular period of time

Association: The direct link between an important historic event or person and a historic property

Certain properties are generally considered ineligible for listing in the NRHP, including cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions, relocated structures, or commemorative properties, unless they meet special requirements. Additionally, a property must be at least 50 years of age to be eligible for listing in the NRHP. The National Park Service states that 50 years is the general estimate of the time needed to develop the necessary historical perspective to evaluate significance (National Park Service [NPS] 1997:41). Properties

which are less than 50 years must be determined to have "exceptional importance" to be considered eligible for NRHP listing.

b. State Regulations

California Environmental Quality Act (CEQA)

California Public Resources Code (PRC) Section 21804.1 requires lead agencies to determine if a project could have a significant impact on historical or unique archaeological resources. As defined in PRC Section 21084.1, a historical resource is a resource listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources or identified in a historical resources survey pursuant to PRC Section 5024.1(g), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant. PRC Section 21084.1 also states resources meeting the above criteria are presumed to be historically or culturally significant unless the preponderance of evidence demonstrates otherwise. Resources listed in the NRHP are automatically listed in the CRHR and are, therefore, historical resources under CEQA. Historical resources may include eligible built environment resources and archaeological resources of the precontact or historic periods.

CEQA Guidelines Section 15064.5(c) provides further guidance on the consideration of archaeological resources. If an archaeological resource does not qualify as a historical resource, it may meet the definition of a "unique archaeological resource" as identified in PRC Section 21083.2. PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: 1) it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information, 2) has a special and particular quality such as being the oldest of its type or the best available example of its type, or 3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological resource does not qualify as a historical or unique archaeological resource, the impacts of a project on those resources will be less than significant and need not be considered further (CEQA Guidelines Section 15064.5[c][4]). CEQA Guidelines Section 15064.5 also provides guidance for addressing the potential presence of human remains, including those discovered during the implementation of a project.

Pursuant to CEQA, an impact that results in a substantial adverse change in the significance of a historical resource is considered a significant impact on the environment. A substantial adverse change could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired (CEQA Guidelines Section 15064.5 [b][1]). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR or a local register (CEQA Guidelines Section 15064.5[b][2][A]).

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a][b]).

CEQA Guidelines Section 15126.4 stipulates an EIR must describe feasible measures to minimize significant adverse impacts. In addition to being fully enforceable, mitigation measures must be completed within a defined time period and be roughly proportional to the impacts of the project. Generally, a project which is found to comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Standards) is considered to be mitigated below a level of significance (CEQA Guidelines Section 15126.4 [b][1]). For cultural resources of an archaeological nature, lead agencies should also seek to avoid damage where feasible. Preservation in place is the preferred manner of mitigating impacts to archaeological sites; however, data recovery through excavation may be the only feasible mitigation available in certain instances (CEQA Guidelines Section 15126.4[b][3]).

California Register of Historical Resources

The CRHR was established in 1992 and codified by PRC Sections 5024.1 and 4852. The CRHR is an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (Public Resources Code, 5024.1(a)). The criteria for eligibility for the CRHR are consistent with the NRHP criteria but have been modified for State use to include a range of historical resources that better reflect the history of California (Public Resources Code, 5024.1(b)). Unlike the NRHP however, the CRHR does not have a defined age threshold for eligibility; rather, a resource may be eligible for the CRHR if it can be demonstrated sufficient time has passed to understand its historical or architectural significance (California Office of Historic Preservation 2006). Furthermore, resources may still be eligible for listing in the CRHR even if they do not retain sufficient integrity for NRHP eligibility (California Office of Historic Preservation 2006). Generally, the California Office of Historic Preservation recommends resources over 45 years of age to be recorded and evaluated for historical resources eligibility (California Office of Historic Preservation 1995:2).

A property is eligible for listing in the CRHR if it meets one of more of the following criteria:

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 to our past

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

California Health and Safety Code

California Health and Safety Code Section 7050.5 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 if the remains are subject to the Coroner's authority. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification.

California Public Resources Code Section 5097.98

California Public Resources Code Section 5097.98 states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify those persons (i.e., the Most Likely Descendant [MLD]) that it believes to be descended from the deceased. With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

c. Local Regulations

City of Mountain View Historic Preservation Ordinance

The City of Mountain View Historic Preservation Ordinance (City Code Division 15, Section 36.54.45) was adopted in 2004, which focuses on preservation and protection of Mountain View's historic resources and encouraging their restoration (City of Mountain View 2025b). The Historic Preservation Ordinance established the Register of Historic Resources, the City's official listing of locally designated historic resources and is described in Section 36.54.65:

A building, structure, site or other improvement may be designated as a historic resource and placed on the Mountain View Register of Historic Resources if the city council finds that it meets one or more of the following criteria:

a. Is strongly identified with a person who, or an organization which, significantly contributed to the culture, history or development of the City of Mountain View
b. Is the site of a significant historic event in the city's past
c. Embodies distinctive characteristics significant to the city in terms of a type, period, region or method of construction or representative of the work of a master or possession of high artistic value, or
d. Has yielded, or may be likely to yield, information important to the city's prehistory or history.

Section 36.54.90 details alterations to NRHP and CRHR properties:

> Alterations to buildings which are eligible for the National Register of Historic Places or the California Register of Historical Resources shall be reviewed pursuant to Section 36.54.85 a., b., c., and d. and except that the city council shall determine whether to grant an HP permit and the council must find that the alteration is in substantial compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. If an HP permit is granted, any structure proposed to replace a historic resource shall be subject to design review and approval by the city council.

Mountain View 2030 General Plan

Chapter 3 of the Mountain View 2030 General Plan addresses land use and design (LUD) topics aimed to retain the distinct character of neighborhoods, create community vibrancy through inviting streets and public spaces, and focus on walkability. Chapter 3 specifically outlines several historic preservation policies aimed at preserving local historic and cultural resources and encourage their continued protection and enhancement. These include the following:

Goal LUD-11: Preserved and protected important historic and cultural resources

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 Historical Resources, or the National Register of Historic Places.

Policy LUD 11.2: Adaptive reuse. Encourage the adaptive reuse 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 11.4: Moffett Field. Support the preservation of historic buildings and hangars at Moffett Field and NASA Ames.

Policy LUD 11.5: Archaeological and paleontological site protection. Require all new development to meet 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.

Mountain View Standard Conditions of Approval

As part of discretionary review, the City has standard conditions for different types of approvals. For all construction activities, the City has standard conditions relating to the discovery of archaeological resources, human remains, and the preservation historic architectural resources. The City also has standard conditions for construction work cultural sensitivity training, Native American monitoring, and procedures in the event of the discovery of tribal cultural resources, that can be included if they are requested by a tribe during tribal consultation for a project.

Vibration and Settlement Plan– For Projects Adjacent to Historic Structures

At building permit submittal, the applicant shall prepare a Vibration and Settlement Plan which specifies monitoring and mitigation measures to avoid damage to the adjacent building(s) as a result of project construction. Approved monitoring protocols shall be in place prior to issuance of any building permits for the project.

Secretary of the Interior Standards

All construction activities, including maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of the historical resource, shall be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Documentation of Historic Resources

Prior to issuance of building permit for any work being done on the historic structure, the applicant shall provide the following documentation: (1) two copies of each historical assessment, printed on archival paper, and (2) two complete sets of photographs of the existing property (including the immediate neighborhood to establish context), the site (including any nonhistoric structures), all exterior elevations and features, and all interior spaces and features. The applicant shall utilize a 35-mm camera with black and white film only. The photographs shall be printed on fiber paper, and all

negatives and prints must meet the Historic American Building Survey Photographic Standards for archival processing.

All documentation shall be forwarded to the Planning Division (one copy of which will be forwarded to the Mountain View History Center) prior to the issuance of any building or demolition permits for the property.

Salvage Program

The applicant shall undertake a salvage program to save and promote reuse of the buildings' historically significant materials and features to the extent reasonably feasible. Salvage allows for the removal of individual architectural elements for potential reuse. Salvaged elements could be reused at the project site or another project or be given to an architectural salvage company. Salvage has the added benefit of landfill and waste diversion.

Discovery of Archaeological Resources

If prehistoric or historic-period cultural materials are unearthed during ground-disturbing activities, it is recommended that all work within 100 feet of the find be halted until a qualified archaeologist and Native American representative can assess the significance of the find. Prehistoric materials might include obsidian and chert-flaked stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil ("midden") containing heat affected rocks and artifacts; stone milling equipment (e.g., mortars, pestles, hand stones, 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, will develop a treatment plan that could include site avoidance, capping, or data recovery.

Discovery of Human Remains

In the event of the discovery of human remains during construction or demolition, there shall be no further excavation or disturbance of the site within a 50 foot radius of the location of such discovery, or any nearby area reasonably suspected to overlie adjacent remains. The Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to their authority, the Coroner shall notify the Native American Heritage Commission, which shall attempt to identify descendants of the deceased Native American. If no satisfactory agreement can be reached as to the disposition of the remains pursuant to this State law, then the landowner shall reinter the human remains and items associated with Native American burials on the property in a location not subject to further subsurface disturbance. A final report shall be submitted to the City's Community Development Director prior to the release of a Certificate of Occupancy. This report shall contain a description of the mitigation 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.

(If Requested) Cultural Sensitivity Training

As requested during the Tribal Consultation process for the project, Cultural Sensitivity Training shall be provided to the construction crews at the beginning of the project to aid those involved in the

project to become more familiar with the indigenous history of peoples in the vicinity of the project site.

(If Requested) Native American Archaeological Monitor

A Native American archaeological monitor shall be present for all ground-disturbing activities throughout the project construction process.

(If Requested) Discovery of Tribal Cultural Resources

If indigenous or historic-era archaeological resources are encountered during construction activities, all activity within 100 feet of the find shall cease and the find shall be flagged for avoidance. 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. The qualified archaeologist and the Native American representative shall inspect the find within 24 hours of discovery and notify the City of their initial assessment. Indigenous archaeological materials might include obsidian and chert-flaked stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil (midden) containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, hand stones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include building or structure footings and walls, 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, will develop a treatment plan that could include site avoidance, capping, or data recovery.

4.4.3 Impact Analysis

Methodology and Significance Thresholds

Methodology

The assessment of potential impacts to historical and archaeological resources and human remains were informed based on a review of readily available information. To identify known historical resources located within the Project area, which includes the R3 and R2 Zoning districts in the City of Mountain View, the background research for this study included a review of the NRHP, CRHR, BERD, Mountain View Register of Historic Resources, and available information related to the Mountain View Housing Element, as provided by the City. The review identified approximately 48 properties within the Project area which qualify as historical resources that are listed in, or eligible for, the NRHP or CRHR and/or listed int the Mountain View Register of Historic Resources. However, due to City database constraints and the presence of parcels that have not yet received an eligibility determination, it was not feasible to provide accurate accounting of which parcels in the Project area contain known historical resources at the programmatic level.

To identify known archaeological resources within the Project area, sources from the NRHP, OHP, BERD, Mountain View Register of Historic Resources, the City's Draft Historic Context Statement, and NWIC were reviewed. As a programmatic document, this EIR presents an assessment of the Proposed Project. Because the R3 Zoning District Update is intended to guide zoning actions for many years into the future and because archaeological resource locations are confidential, this analysis relies on program-level evaluation.

Significance Thresholds

If a project may cause a substantial adverse change in the characteristics of a resource that convey its significance or justify its eligibility for inclusion in the CRHR, either through demolition, destruction, relocation, alteration, or other means, then the project would have a significant effect on the environment (CEQA Guidelines Section 15064.5[b]). To determine whether a project would result in a significant impact to Cultural Resources, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

1. Cause a substantial adverse change in the significance of a historic resource pursuant to Section 15064.5;
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or,
3. Disturb any human remains, including those interred outside of formal cemeteries.

Direct impacts can be assessed by identifying the types and locations of proposed development, determining the exact locations of cultural resources within the project area, assessing the significance of the resources that may be affected, and determining the appropriate mitigation. Removal, demolition, or alteration of historical resources can permanently impact the historic fabric of an archaeological site, structure, or historic district.

The State Legislature, in enacting the CRHR, amended CEQA to clarify which properties are significant, as well as which project impacts are considered to be significantly adverse. A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have significant effects on the environment (*CEQA Guidelines* Section 15064.5[b]). A substantial adverse change in the significance of a historical resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired (*CEQA Guidelines* Section 15064.5[b][1]).

The *CEQA Guidelines* further state that:

> [t]he significance of an historical resource is materially impaired when a project… [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in the California Register … local register of historic resources… or its identification in an historic resources survey.

As such, the test for determining whether or not the project will have a significant impact on identified historic resources is whether it will materially impair physical integrity of the historic resource such that it could no longer be listed in the CRHR.

This analysis focuses on impacts associated with implementation of the Proposed Project which would facilitate the creation of five new R3 zoning subdistricts in Table 2-1 in Section 2, *Project Description*. The new zoning districts would be applied throughout the City of Mountain View, as depicted in Figure 2-6 in Section 2, *Project Description*.

Historical resources include both built environment and archaeological resources. However, to more clearly differentiate between built environment and archaeological resources, analysis under Threshold 1 is limited to built environment resources. Archaeological resources, including those that may be considered historical resources pursuant to CEQA Guidelines Section 15064.5 and those that

may be considered unique archaeological resources pursuant to *CEQA Guidelines* Section 21083.2, are considered under Threshold 2.

Project Impacts and Mitigation

Threshold 1:	Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Impact CUL-1 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT COULD ADVERSELY AFFECT UNIDENTIFIED HISTORICAL RESOURCES. IMPACTS TO HISTORICAL RESOURCES WOULD BE LESS THAN LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED WITH IMPLEMENTATION OF THE CITY'S EXISTING POLICIES AND REGULATIONS.

Research has identified at least 48 properties eligible for or listed in the NRHP, CRHR, and/or Mountain View Register of Historic Resources within the Project area that qualify as historical resources. Additionally, the Project area includes historic-aged buildings, structures, objects, sites, and/or districts. Pending further analysis, there is potential for these buildings, structures, objects, sites, and/or districts to qualify as historical resources pursuant to CEQA.

Although there is no specific development associated with the Project, implementation of the Project would guide development, including establishment of new R3 zoning subdistricts and development standards that, after adoption, allow for upzoning and greater density. Full buildout associated with the Project could result in up to 10,000-16,000 additional residential units through the year 2050, consisting of existing development potential for roughly 1,200 existing units plus potential for approximately 8,800-14,800 additional units. Therefore, potential future development facilitated by the Project may include site preparation, demolition, and construction activities and could have the potential to result in the physical demolition, destruction, relocation, or alteration of potential historical resources. Development facilitated by the Project could result in direct impacts to potential historical resources through demolition and construction activities associated with the Project.

The City of Mountain View has adopted policies and implemented a Historic Preservation Ordinance to minimize impacts to historical resources, which would apply to future development facilitated by the Project. As outlined above in Section 4.4.2, Regulatory Setting, General Plan policies encourage preservation and are partially implemented through the Standard Condition of Approval – Secretary of the Interior Standards that requires construction activities, including maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of the historical resource, to be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Mitigation measures CUL-1a and CUL-1b would require applicants for relevant projects to conduct a historic resource evaluation and avoid demolition through the use of the Standard Condition of Approval – Secretary of Interior Standards. Therefore, with implementation of the City's General Plan policies, the Historic Preservation Ordinance, and requirement for Standard Condition of Approval – Secretary of Interior Standards, there would be a less than significant impact on historical resources. However, if development facilitated by the Project involves demolition or substantial alteration of historical resources not in compliance with the Secretary of Interior's Standards then project-specific CEQA review would be required, with project specific mitigation measures.

Mitigation Measures

The Proposed Project would be subject to Mitigation Measure CUL-1a, described below. This measure requires a Historic Resources Evaluation to be conducted for individual projects that may involve demolition of a previously unevaluated built environment resource, or require individual projects to be redesigned to avoid demolition if feasible.

CUL-1a Historical Resources Evaluations

The historical resources evaluation described below shall not be required if a property is already a historical resource as defined by CEQA Guidelines Section 15064.5(a), or has been evaluated as ineligible pursuant to the criteria outlined in CEQA Guidelines Section 15064.5(a)(3), or evaluated in a survey meeting the requirements of 5024.1(g) of the California Public Resources Code. In 2023, the City conducted a reconnaissance survey of the following structures if they were built before 1980: multi-family and nonresidential buildings City-wide, single-family and duplex dwellings outside of R zones, and previously identified resources. The survey identified a select few for intensive-level evaluation and nomination to the City's Register, which shall not require re-evaluation. Other information from the survey may be used, as appropriate, to inform site-specific evaluations.

A historical resources evaluation shall be prepared for development projects carried out under the project involving the demolition or substantial physical alteration of a building, structure, object, site, or historic district that is 45 years of age or older. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history (Qualified Architectural Historian). The Qualified Architectural Historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify potential historical resources that could be subject to direct or indirect impacts as a result of the proposed development. All properties 45 years of age or older shall be evaluated for eligibility for listing in the NRHP, CRHR and Mountain View Register of Historic Resources within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. All evaluated properties shall be documented on California Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the City for review and concurrence. The final report shall be submitted to the Northwest Information Center.

CUL-1b Historical Resources Treatment

If a project would occur on a site containing a historical resource as identified during implementation of Mitigation Measure CUL-1a, impacts shall be mitigated to historical resources identified within a proposed development site. Application of mitigation shall be overseen by a Qualified Architectural Historian and/or historic architect meeting the PQS.

Mitigation must include avoidance, or preservation, rehabilitation, restoration, or reconstruction of the resource consistent with the Secretary of the Interior's Standards for the Treatments of Historic Properties (Standards) in accordance with the City's Standard Conditions of Approval. In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR Section 15126.4[b][1]). A report identifying and specifying the project description, treatment of character-defining features, and compliance with the Standards shall be submitted to the City for review and approval prior to the issuance of permits.

If historical resources are identified on a development site and required compliance with the Standards and/or avoidance is not possible, then a project specific EIR will be required with project-specific mitigation measures.

Significance After Mitigation

Implementation of mitigation measures CUL-1a and CUL-1b would reduce impacts to historical resources by identifying and evaluating significant historical resources and requiring avoidance, or preservation, rehabilitation, restoration, or reconstruction in compliance with the Standards. With implementation of mitigation measures CUL-1a and CUL-1b, historical resources would not be materially impaired by future development that would be carried out under the project. The impact is less than significant with mitigation incorporated. If compliance with the Standards and/or avoidance is not possible, then project- specific CEQA would be required with project specific mitigation measures.

Threshold 2:	Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Impact CUL-2 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT COULD ADVERSELY AFFECT ARCHAEOLOGICAL RESOURCES. IMPACTS TO ARCHAEOLOGICAL RESOURCES WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED WITH IMPLEMENTATION OF THE CITY'S POLICIES AND REGULATIONS.

Seven prehistoric resources and four multicomponent resources were identified as a result of the 2022 NWIC records search, and three of these resources are located within the R3 Zoning District Update sites. Archaeological resources have been reported throughout the city and the surrounding areas including precontact and historic-period sites. Based on a review of the NRHP (2025), California Office of Historic Preservation (OHP) website (OHP 2025), Built Environment Resource Directory (BERD) for Santa Clara County, Mountain View Register of Historic Resources (City of Mountain View 2022a), the City's Draft Historic Context Statement (Page and Turnbull 2024), a Northwest Information Center (NWIC) records search, historical and geological maps, and aerial photographs, it is possible that additional archaeological resources may be present within the R3 Zoning District Update sites. These resources would most likely be encountered during excavation activities in areas in proximity to historic sources of water and previous development. Additionally, extensive development does not preclude the possibility of intact archaeological deposits within the Project area.

Effects on archaeological resources are only known once a specific project has been proposed because the effects are highly dependent on both the individual development site conditions and the characteristics of the proposed ground-disturbing activity. Ground-disturbing activities associated with development, particularly in areas that have not been studied through a cultural resources investigation, have the potential to damage or destroy previously-unknown archaeological resources that may be present on or below the ground surface. Site specific studies would be required to identify resources and impacts.

The R3 Zoning District Update includes parcels that have previously been developed and disturbed and it is likely that prior grading, construction, and modern use of the Project area would have either removed or disturbed archaeological resources within surficial soils. Nonetheless, there is the potential for archaeological resources to exist within previously disturbed contexts or below levels of previous disturbance, which could be disturbed by grading and excavation activities associated

with the Project. Therefore, future projects involving ground disturbing activities would have the potential to damage or destroy buried archaeological resources qualifying as historical resources or unique archaeological resources under CEQA. This impact is potentially significant.

Mitigation Measures

The Proposed Project would be subject to mitigation measures CUL-2a and CUL-2b, described below. Mitigation Measures CUL-2a requires an archaeological resources assessment to identify and treat archaeological resources. Mitigation Measure CUL-2b establishes protocol for unanticipated discoveries during construction.

CUL-2a Archaeological Resources Assessments

Prior to approval of a project that involves substantial ground disturbance activities such as grading, trenching, or excavation, an Archaeological Resources Assessment shall be prepared under the supervision of an archaeologist that meets the Secretary of the Interior's Professional Qualification Standards in either prehistoric or historic archaeology (Qualified Archaeologist) as defined in Code of Federal Regulations, Title 36, Part 61). Projects involving minor ground disturbance such as landscaping, planting, pruning, repaving, or other activities with limited ground disturbance would not require an Archaeological Resources Assessment.

Archaeological Resources Assessments shall include a California Historical Resources Information System records search at the Northwest Information Center (NWIC), a Sacred Lands File search maintained by the Native American Heritage Commission, intensive-level pedestrian survey, and archaeological sensitivity analysis utilizing review of ethnographic data, and historical, geological, and soil maps, aerial imagery, and geotechnical reports. A Qualified Archaeologist shall identify known archaeological resources and classify the project site as having high, moderate, or low sensitivity for unknown archaeological resources. The assessment shall also include recommendations for additional studies and/or mitigation, as necessary. The assessment shall be completed prior to project approval. The final report must be submitted to the Northwest Information Center.

If the Archaeological Resources Assessment identifies resources that may be affected by the project, an Extended Phase I testing program and/or Phase II testing and evaluation may be required, as determined by the Qualified Archaeologist, to identify the extent and significance of the resource. Extended Phase I testing and Phase II testing and evaluation must be completed prior to project construction. If resources are determined eligible for the NRHP and/or CRHR or unique archaeological resources as defined by PRC 21083.2(g), avoidance or preservation-in-place may reduce impacts to a less than significant level. If avoidance is not possible, then a project specific EIR will be required with project specific mitigation measures.

The City will review and approve reports and ensure that mitigation measures are implemented as appropriate prior to or during construction.

CUL-2b Unanticipated Discoveries

In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and a Qualified Archaeologist shall be contacted immediately to evaluate the resource. If the resource is determined by the Qualified Archaeologist to be of Native American origin, then a Native American representative shall also be contacted to participate in the consultation concerning the resource. If the PQS archaeologist determines it to be

appropriate, in coordination with the Native American representative, archaeological testing for NRHP and/or CRHR eligibility shall be completed. If the resource proves to be eligible for the NRHP and/or CRHR and significant impacts to the resource cannot be avoided via project redesign, a PQS archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. The data recovery plan shall be implemented prior to any additional disturbances of potentially sensitive deposits. The City shall review and approve all archaeological work prior to implementation and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Section 15126.4(b)(3)(C).

Significance After Mitigation

Implementation of mitigation measures CUL-2a and CUL-2b would reduce impacts to archaeological resources by ensuring the identification, evaluation, and avoidance of archaeological resources that may be impacted by future projects. Therefore, the impact is less than significant with mitigation incorporated. If avoidance is not possible, then a project specific EIR will be required with project specific mitigation measures.

Threshold 3:	Would the project disturb any human remains, including those interred outside of formal cemeteries?

Impact CUL-3 GROUND-DISTURBING ACTIVITIES ASSOCIATED WITH DEVELOPMENT UNDER THE PROPOSED PROJECT COULD RESULT IN DAMAGE TO OR DESTRUCTION OF HUMAN BURIALS. IMPACTS WOULD BE LESS THAN SIGNIFICANT THROUGH ADHERENCE TO STATE HEALTH AND SAFETY CODE SECTION 7050.5, 7051, AND 7054 AND PUBLIC RESOURCES CODE SECTION 5097.98.

Human burials outside of formal cemeteries can occur in a variety of contexts including but not limited to archaeological contexts, outside of the boundaries of formal cemeteries, or in private family cemeteries. Excavation, grading, trenching, and other ground disturbance activities could have the potential to disturb these resources that could include Native American burial sites, particularly in areas where ground disturbance has not already occurred or where excavation depths exceed those previously attained. The R3 Zoning District Update includes parcels that have previously been developed and disturbed and it is likely that prior grading, construction, and modern use of the Project area would have either removed or disturbed human remains within surficial soils. Nonetheless, there is the potential for human remains to be encountered as a result of implementation of the Project.

Human burials, in addition to being potential archaeological resources, have specific provisions for treatment in PRC Section 5097. The California Health and Safety Code (Section 7050.5, 7051, and 7054) has specific provisions for the protection of human burial remains. Existing regulations address the illegality of interfering with human burial remains, and protect them from disturbance, vandalism, or destruction. They also include established procedures to be implemented if Native American skeletal remains are discovered. PRC Section 5097.98 also addresses the disposition of Native American burials, protects such remains, and established the NAHC to resolve any related disputes.

All projects are subject to State of California Health and Safety Code Section 7050.5, which states that, if human remains are unearthed, no further disturbance can occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to the PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site and make recommendations to the landowner within 48 hours of being granted access. With adherence to PRC Section 5097 and California Health and Safety Code Sections 7050.5, 7051, and 7054, impacts related to disturbance of human remains would be less than significant.

Mitigation Measures

This impact would be less than significant without mitigation.

4.4.4 Cumulative Impacts

IMPACT CUL-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD NOT RESULT IN A CUMULATIVELY CONSIDERABLE IMPACT TO HISTORICAL RESOURCES, WOULD NOT CAUSE A SIGNIFICANT CUMULATIVE DISTURBANCE OF ARCHAEOLOGICAL RESOURCES, AND WOULD NOT RESULT IN A CUMULATIVELY SIGNIFICANT IMPACT TO HUMAN REMAINS. WITH IMPLEMENTATION OF MITIGATION MEASURES CUL-1A AND 1B, AND CUL-2A AND 2B, CUMULATIVE CULTURAL RESOURCE IMPACTS WOULD BE LESS THAN SIGNIFICANT, AND THE CONTRIBUTION OF THE PROJECT WOULD NOT BE CUMULATIVELY CONSIDERABLE.

The geographic scope for cumulative cultural resource impacts is based on the historic, ethnographic, and prehistoric period use patterns of the Project area and surrounding region. The geographic extent of cumulative impacts for the historic period is the City of Mountain View. The geographic scope for the pre-colonial period is Santa Clara County and the areas traditionally occupied by the people indigenous to the region. This geographic scope is appropriate because cultural resources are regionally specific and cultural resources in this larger region will be similar in type and style to those that are or may be present in the Project area. Cumulative buildout in this region, including projects listed in Table 3-1 would have the potential to adversely impact cultural resources.

Buildout of cumulative projects could result in significant cumulative impacts to known and/or unknown historical resources. The combination of the Proposed Project as well as other relevant projects and programs, plans and larger scale projects could potentially involve the cumulative demolition or alteration of historical resources. Even though various cumulative projects could require the reduction of impacts to built environment historical resources to the maximum extent feasible, cumulative development could nonetheless cause the loss of built environment historical resources. This would represent a significant cumulative impact. Implementation of the Mitigation Measure CUL-1a which requires evaluation of historic-age resources and Mitigation Measure CUL-1b which requires compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, would reduce the severity of impacts associated with the proposed project. Combined with General Plan Policies LUD 11.1 – 11.4 and the Standard Conditions of Approval, the impacts associated with implementation of the proposed project would be mitigated to a less than significant level. As a result, the proposed project's contribution to the potentially significant cumulative impact on historical resources would not be considerable, and the cumulative impact of the proposed project combined with cumulative development would be less than significant.

Cumulative development could potentially disturb areas that may contain archaeological resources, which represent nonrenewable resources that, once damaged, cannot be repaired or replaced. Though archaeological resources can sometimes be preserved when discovered during excavation, there is no guarantee that these resources can be protected and preserved. The Proposed Project would contribute a less than significant impact after the implementation of mitigation measures CUL-2a and CUL-2b, which would require a qualified archaeologist to conduct an Archaeological Resources Assessment prior to construction, the cessation of activities in the vicinity of finds, and tribal consultation when indigenous resources are inadvertently identified during project construction. As a result, the less-than-significant incremental impact would not be cumulatively considerable and thus would not combine with the incremental impact of other projects to cause a significant cumulative effect.

Projects facilitated by the Proposed Project in conjunction with other nearby past, present and reasonably foreseeable future projects could potentially disturb areas that may contain previous unknown human remains. While there is the potential for significant cumulative impacts to human remains, it is anticipated that potential impacts associated with individual cumulative projects would be addressed on a case-by-case basis and would be subject to local and State regulations regarding the treatment of human remains. Therefore, with compliance with State regulations and the applicable local policies, the cumulative impact related to human remains would be less than significant.

4.5 Geology and Soils

This section discusses the environmental and regulatory setting related to geology and soils; the criteria used to determine the significance of environmental impacts for this topic; and potential impacts related to geology and soils that would result from implementation of the Project.

4.5.1 Setting

The City of Mountain View is located in the Coast Ranges geomorphic province, one of the eleven geomorphic provinces of California (California Geological Survey 2002). The Coast Ranges extend along the majority of California's coast from the California-Oregon border to Point Arguello in Santa Barbara County in the south and consist of northwest-trending mountain ranges and valleys. The Coast Ranges are composed of Mesozoic and Cenozoic sedimentary, igneous, and metamorphic strata. The eastern side is characterized by strike-ridges and valleys in the Upper Mesozoic strata (California Geological Survey 2002). Specifically, the project site is located on the San Francisco Peninsula, which separates the Pacific Ocean and San Francisco Bay. The San Francisco Peninsula is primarily comprised of Mesozoic bedrock of the Franciscan Complex, which is overlain by Pliocene to modern sediments (Graymer et al. 2006).

Earthquake Faults and Surface Rupture

A fault is a fracture or an area of fractures between two units of rock that allow the units to move relative to each other, which can occur slowly over time as creep or rapidly during an earthquake. Earthquake faults are categorized as active, potentially active, and inactive. A fault is classified as active if it has moved during the Holocene epoch, which consists of approximately the last 11,700 years. A fault is classified as potentially active if it has experienced movement within the Quaternary epoch, which is during the last 1.8 million years, but not within the Holocene epoch. A fault is classified as inactive if sufficient geologic evidence indicates that the fault is no longer active. A Quaternary fault is one that has been recognized at the surface and that has moved in the past 1.8 million years(California Department of Conservation [DOC] 2018). The term seismicity describes the effects of seismic waves that are radiated from an earthquake fault in motion. While most of the energy released during an earthquake results in the permanent displacement of the ground, as much as 10 percent of the energy may dissipate immediately in the form of seismic waves. Faults are geologic hazards due to the potential for both surface fault rupture and seismic ground shaking (discussed in the following subsection), which are distinct but related properties. Surface fault rupture is the breakage of ground along the surface trace of a fault, which is caused by the intersection of the fault surface area ruptured in an earthquake with the earth's surface. Surface fault displacement occurs when material on one side of a fault moves relative to the material on the other side of the fault as a result of surface fault rupture. Surface fault rupture and displacement can be very destructive to structures and infrastructure constructed across active faults and within the rupture zone. However, the zone of damage is limited to a relatively narrow area along either side of the fault, as opposed to seismic ground shaking damage, which can be quite widespread. The amount of surface displacement during a rupture event can range from a few inches to tens of feet.

Mountain View is located in the seismically active San Fransico Bay. The San Jose Fault, the Stanford Fault, the Cascade Fault, while all inactive, are located within Mountain View as shown in Figure 4.5-1. The San Jose Fault is a northwest-trending fault that runs through the northeast corner of the city of Mountain View. The Cascade Fault is also northwest-trending and runs through the

southwest corners of the city. The Stanford Fault, also northwest-trending, runs almost parallel to the Cascade Fault, just south of the middle of the city. Faults in Mountain View run roughly parallel to the San Andreas Fault, which is approximately six miles from the city limits (United States Geological Survey [USGS] 2025a). The San Andreas Fault Zone is the dominant active fault in California. It is the primary surface boundary between the Pacific and the North American plate. There have been numerous historic earthquakes along the San Andreas Fault. According to the Mountain View General Plan, the San Andreas, Hayward, and San Gregorio are major regional faults outside of Mountain View, however located in the Coast Ranges that can produce ground shaking (City of Mountain View 2012).

USGS estimates there is a 72 percent probability (or likelihood) of at least one earthquake of magnitude 6.7 or greater striking somewhere in the greater San Francisco Bay region before 2043. The 30-year probability of a magnitude 6.7 earthquake on the northern segment of the San Andreas Fault is 21 percent (USGS 2016).

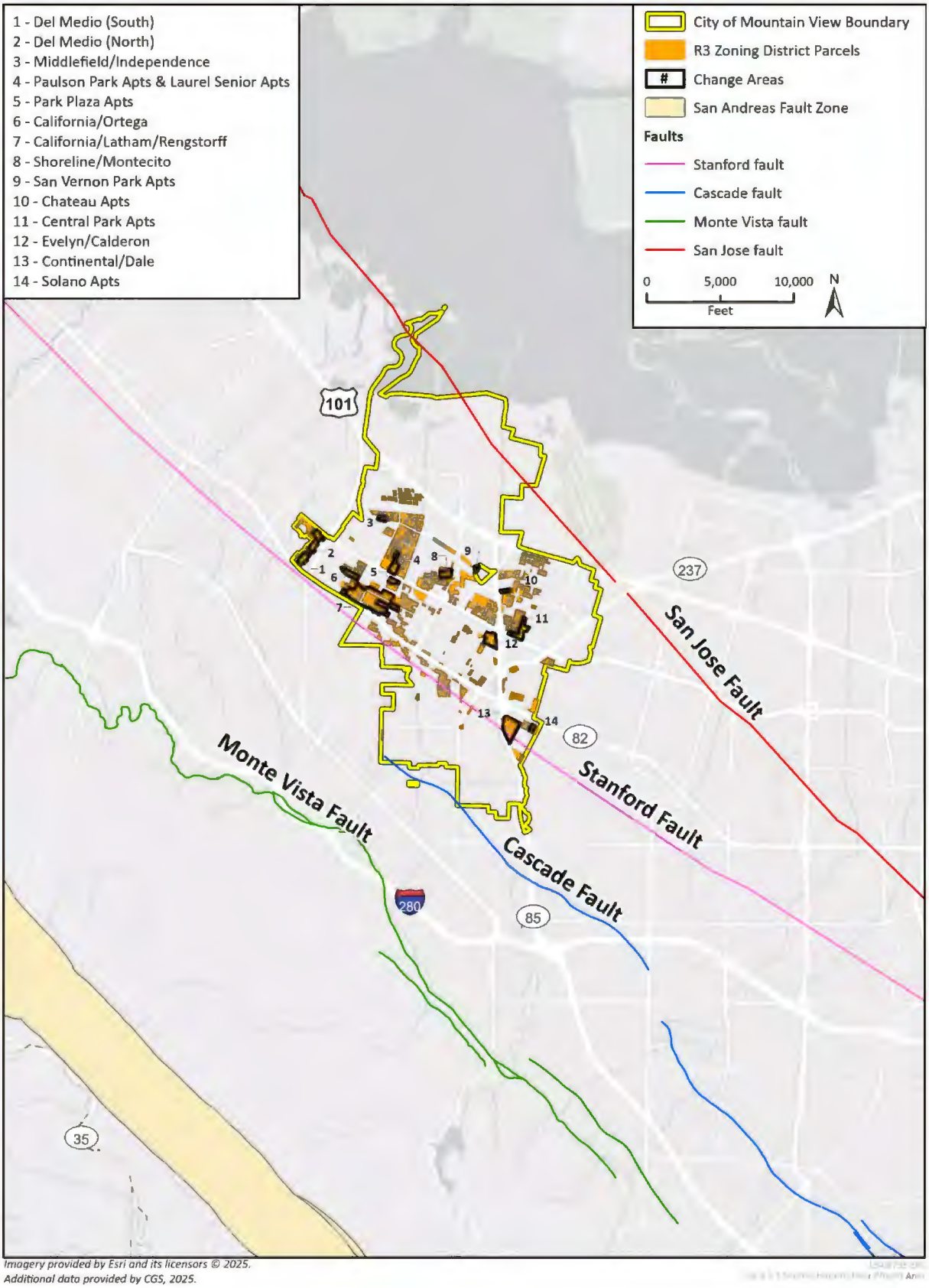
Fault rupture can cause property damage, possibly resulting in injury and loss of life in the event of a major earthquake due to ground motion. Seismically induced ground-shaking could be experienced in the project area due to seismic activity along other faults in California, depending upon the location of the earthquake epicenter and the character and duration of the seismic event. Specific effects of a seismic event on the project area would depend upon characteristics of the underlying soil and rock, as well as the building materials and techniques used in construction. Secondary effects of ground-shaking can lead to other seismic hazards, such as tsunamis, seiches, landslides, liquefaction, lateral spreading, and lurching.

Alquist-Priolo Earthquake Fault Zones are regulatory zones established throughout California by the CGS. These zones identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize the fault rupture hazard potential to habitable structures. Mountain View is not in an Alquist-Priolo Earthquake Fault Zone (CGS 2025a).

Seismic Ground Shaking

In addition to surface rupture, the major cause of structural damage from earthquakes is seismic ground shaking. The intensity of ground motion expected at a particular site depends on the magnitude of the earthquake, the distance to the epicenter, and the geology of the area between the epicenter and the property. The composition of underlying soils, even those relatively distant from faults, can intensify ground shaking. Greater movement can be expected at sites located on poorly consolidated material, such as alluvium, within close proximity to the ruptured fault, or in response to a seismic event of great magnitude. Strong ground shaking from an earthquake can result in damage to buildings that can shift off their foundations and to underground pipes that can break. The potential for damage is most likely to be minimal where bedrock is located close to the ground surface. Mountain View is situated in an area with deep alluvial deposits, or softer soils that are more prone to amplified seismic shaking. As such, older buildings constructed before building codes were in effect, and even relatively newer buildings constructed before earthquake resistance provisions were included in building codes in 1933, are the most likely to suffer damage in an earthquake. However, earthquake retrofitting is actively promoted in the region, and most buildings incorporate features that help to absorb and dissipate earthquake energy, such as shear walls, moment frames, and foundation anchoring, making them structurally resistant to earthquake damage.

Figure 4.5-1 Earthquake Faults in the Vicinity of Mountain View



Strong ground shaking can also cause tsunamis. The major California offshore faults close to the region are predominantly strike-slip faults, and earthquakes generated on strike-slip faults are not likely to produce large-scale tsunamis. Thus, tsunami potential associated with a local offshore seismic event is low (California Geological Survey [CGS] 2025).

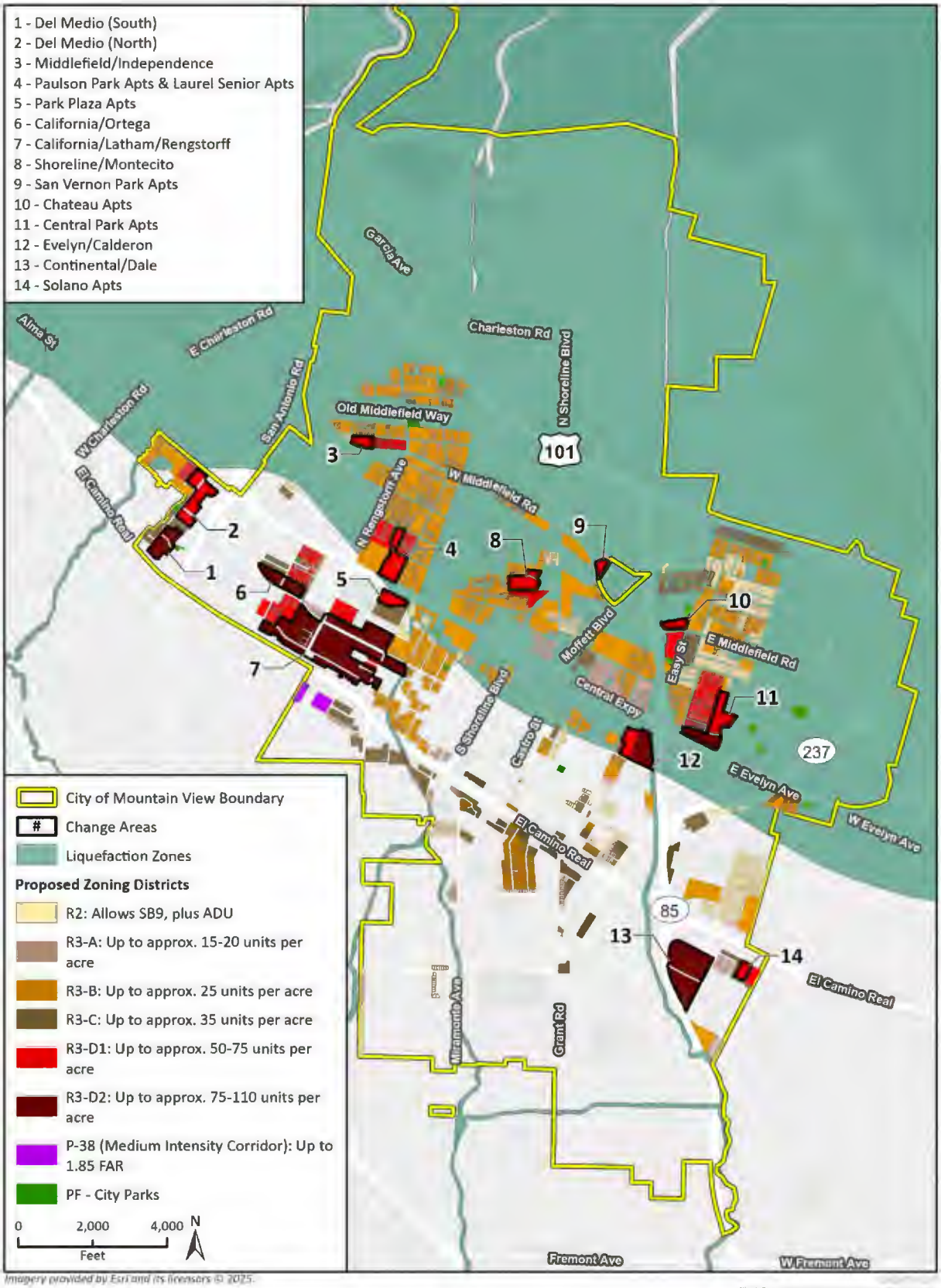
Liquefaction

Liquefaction is a seismic phenomenon in which loose, saturated granular and non-plastic fine-grained soils lose their structure/strength when subjected to high-intensity ground shaking and act like a liquid. Liquefaction occurs when three general conditions exist: 1) shallow groundwater within the top 50 feet of the ground surface; 2) low-density non-plastic soils; and 3) high-intensity ground motion. When liquefaction occurs, it can result in ground failure that can result in damage to roads, pipelines, and buildings. In areas subject to elevated liquefaction hazards with high groundwater tables, certain types of activities have the potential to exacerbate liquefaction risk, such as groundwater injection and stormwater infiltration.

Lateral spreading, closely related to liquefaction, occurs when a subsurface layer liquefies and gravitational and inertial forces cause the layer, and the overlying non-liquefied material, to move in a downslope direction. The potential for lateral spreading is highest in areas underlain by soft, saturated materials, especially in areas bordered by sloping banks or inclined planes to an adjacent open face bank or slope.

The potential for liquefaction ranges from low to very high throughout the city of Mountain View depending on location and underlying materials. Although the liquefaction potential ranges throughout the city, with portions of the City near the Los Altos border having low potential, and lowlands adjacent to the San Francisco Bay having a very high potential for liquefaction, most of Mountain View is built on land with moderate to very high liquefaction potential, as shown in Figure 4.5-2 (City of Mountain View 2012). The CGS has produced numerous maps that show landslide features and delineate potential slope-stability problem areas. Preparation of these maps has been episodic, often driven by landslide disasters and subsequent legislative mandates. CGS maps Landslide and Liquefaction Zones of Required Investigation in California. According to the CGS, portions of the city, in particular areas one half mile north of El Camino Real and adjacent to major waterways, are designated as Seismic Hazard Zones of Required Investigation for liquefaction (CGS 2025b).

Figure 4.5-2 Liquefaction Hazards in the Vicinity of Mountain View



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Additional data provided by CGS, 2025.

Fig 4.5-2

Landslides and Slope Instability

Landslides occur when slopes become unstable and masses of earth material move downslope. Landslides are usually rapid events, often triggered during periods of rainfall or by earthquakes. Mudslides and slumps are a more-shallow type of slope failure. They typically affect the upper surficial soil horizons rather than bedrock features. Usually, mudslides and slumps occur during or soon after periods of rainfall, but they can also be triggered by seismic shaking. Areas most susceptible to landslides have been mapped by the California Division of Mines and Geology. In addition, landslides occur where faults have fractured rock and along the base of slopes or cliffs where supporting material has been removed by stream or wave erosion or by human activities. Heavy rainfall, human actions, or earthquakes can trigger landslides. They may take the form of a slow continuous movement, such as a slump, or may move very rapidly as a semi-liquid mass, such as a debris flow or avalanche.

Slope disturbance and soil creep from a long-term geologic cycle of uplift, mass wasting, intense precipitation or wind, and gravity can result in slope failure in the form of mudslides and rock fall. Mass wasting refers to a variety of erosional processes from gradual downhill soil creep to mudslides, debris flows, landslides, and rock fall—processes that are commonly triggered by intense precipitation or wind, which varies according to climactic shifts. Often, various forms of mass wasting are grouped together as landslides, which are generally used to describe the downhill movement of rock and soil. Soil creep is a long-term, gradual downhill migration of soil under the influence of gravity and is generally on the order of a fraction of an inch per year. These soils can gradually creep downslope from the sides of foundations, reducing lateral support.

The city of Mountain View has Category 1 soils, characterized by stable areas of less than 5 percent slope and not underlain by landslide deposits (City of Mountain View 2012). There are no areas of moderate to high landslide potential in Mountain View based on soil stability levels (CGS 2025c). No significant landslides have been recorded in the city, and no significant areas of landslide susceptibility have been identified.

Subsidence

Subsidence or settlement can occur from immediate settlement, consolidation, shrinkage of expansive soil, and liquefaction. Immediate settlement occurs when a load from a structure or placement of new fill material is applied, causing distortion in the underlying materials. This settlement occurs quickly and is typically complete after placement of the final load. Consolidation settlement occurs in saturated clay from the volume change caused by squeezing out water from the pore spaces. Consolidation occurs over a period of time and is followed by secondary compression, which is a continued change in void ratio[1] under the continued application of the load. Soils tend to settle at different rates and by varying amounts depending on the load weight or changes in properties over an area, which is referred to as differential settlement. Areas underlain by soft sediments or undocumented fills are most prone to settlement.

Natural subsidence occurs from shifting of tectonic plates and dissolution of limestone and can produce sinkholes. Human-induced subsidence can occur from pumping water, oil, or gas from underground reservoirs; collapse of underground mines; drainage of wetlands; and soil compaction. Subsidence can be problematic because it threatens the stability of roads, bridges, canals, and other infrastructure. Soils particularly subject to subsidence include those with high silt or clay content. Soils with high shrink-swell potential can be particularly susceptible to subsidence during a loss of

[1] The void ratio of a soil is the ratio of the volume of the empty spaces between solid particles to the volume of solid particles in the soil.

soil moisture. The USGS documents areas of known subsidence in California. The northern portion of Santa Clara Valley, where Mountain View is located, was the first area in the United States where land subsidence was recognized due to groundwater overdraft, and the first area where remedial action halted subsidence (USGS 2025b).

Expansive and Corrosive Soils

Corrosive soils are considered a geologic hazard because they react with concrete and ferrous metals, which can cause damage to foundations and buried pipelines. According to the United States Department of Agriculture Natural Resources Conservation Service Web Soil Survey, soils in Mountain View are primarily composed of alluvial deposits, which includes sandy loams and silty clays, that have variable corrosion potential depending on drainage and mineral content (USDA NRCS 2025). In general, sand and sandy soils are considered to have the lowest corrosion potential of all soil types, while clay and clayey soils are highly corrosive (Nandi and Vipulanadan 2020). Soils with relatively high clay content are expansive due to the capacity of clay minerals to take in water and swell (expand) to greater volumes. Expansive soils are also considered a geologic hazard because an increase in soil volume can exert forces on structures and, thus, damage building foundations, walls, and floors. Differential settlement is a phenomenon that occurs when one portion of a building's foundation settles unevenly relative to other potions. In general, areas are susceptible to differential settlement if underlain by compressible sediments, such as poorly engineered artificial fill or loose unconsolidated alluvial sediments. When these soils dry out and shrink, structural damage can occur.

Within Mountain View, areas where expansive soils are located may experience subsidence. When fill or structure loads are placed on these soils for development, flood control, or other purposes, settlement can result. Soils in Mountain View range from moderate to high shrink-swell potential, and as such are characterized as expansive (United States Department of Agriculture 2025).

Current provisions of the California Building Code (CBC) contain requirements for slab-on-ground building foundations located on expansive soils. If expansive soils are detected based on a preliminary soil report, the CBC requires the preparation of a soil investigation prior to construction and incorporation of appropriate corrective actions to prevent structural damage, to be determined on a project-by-project basis.

Radon Gas

Radon is a cancer-causing natural radioactive gas that is invisible, odorless, and tasteless. Radon forms from the radioactive decay of small amounts of uranium naturally present in the rocks and soil. It can affect indoor air quality, particularly in mountainous areas. Radon gas from natural sources can accumulate in buildings and is a leading cause of non-smoking lung cancer deaths. Geologic unit radon potentials have been developed using short-term indoor-radon measurement data. Pacific Grove is reported to have a low potential for radon levels to exceed 4.0 Picocuries per Liter (DOC 2007).

Paleontological Resources

Paleontological resources, or fossils, are the remains and traces of prehistoric life (Society of Vertebrate Paleontology [SVP] 2010). Fossils are typically preserved in layered sedimentary rocks and the distribution of fossils is a result of the sedimentary history of the geologic units within which they occur. Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on

several factors. Although it is not possible to determine whether a fossil will occur in any specific location, it is possible to evaluate the potential for geologic units to contain scientifically significant paleontological resources, and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they occur during construction.

The City of Mountain View is located within the Mountain View, California United States Geological Survey 7.5-minute topographic quadrangle. The regional geology was mapped by Brabb et al. (2000), who identified nine distinct geologic units underlying the R3 Zoning Update Project area. The nine geologic units have been sorted into two main significance categories: "No to low sensitivity 0-5 feet, undetermined sensitivity >5 ft" and "High sensitivity." These categorized units are shown in Figure 4.5-3 and are listed below with detailed descriptions:

- Artificial fill
- Artificial levee fill
- Artificial stream channels
- Bay mud
- Basin deposits
- Flood-plain deposits
- Natural levee deposits
- Alluvial fan and fluvial deposits (Holocene)
- Alluvial fan and fluvial deposits (Pleistocene)

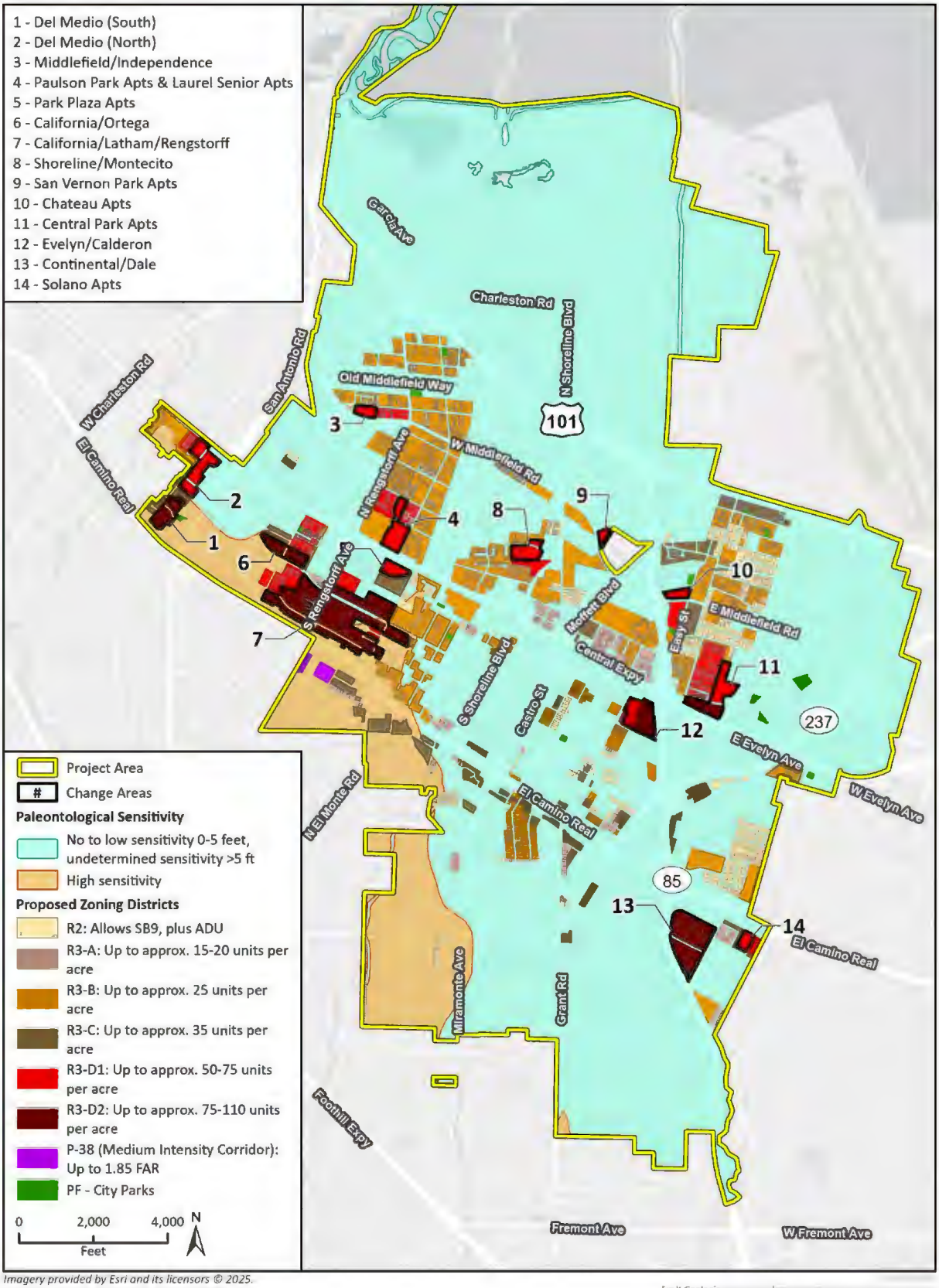
Artificial fill

Artificial fill consists of loose to very well consolidated gravel, sand, silt, clay, rock fragments, organic matter, and man-made debris in various combination (Brabb et al. 2000). Artificial fill is found throughout Mountain View and underlies a portion of the northern project area. Artificial fill is created by human activities and therefore cannot preserve paleontological resources. Brabb et al. (2000) identified a maximum thickness of 30m in some areas, and due to the artificial fill's depositional environment and rate of sedimentation, it is assumed it extends at least 5 feet deep across the entirety of the project area. Beyond this 5-foot depth, older geologic units that are paleontologically sensitive may occur, but this transition depth is an assumption. Therefore, artificial fill has no paleontological sensitivity from surface level to 5 feet deep and an undetermined paleontological sensitivity deeper than 5 feet.

Artificial levee fill

Artificial levee fill consists of man-made deposits of various materials and ages, forming artificial levees (Brabb et al. 2000). Artificial levee fill is found throughout Mountain View and underlies a portion of the northern project area. Artificial levee fill is created by human activities and therefore cannot preserve paleontological resources. Brabb et al. (2000) identified a maximum thickness of 6.5m in some areas, and due to the artificial levee fill's depositional environment and rate of sedimentation, it is assumed it extends at least 5 feet deep across the entirety of the project area. Beyond this 5-foot depth, older geologic units that are paleontologically sensitive may occur, but this transition depth is an assumption. Therefore, artificial levee fill has no paleontological sensitivity from surface level to 5 feet deep and an undetermined paleontological sensitivity deeper than 5 feet.

Figure 4.5-3 Geologic Map and Paleontological Sensitivity of the Project Area



Artificial Stream Channels

Artificial stream channels consist of historic modified stream channels and are in most places where streams have been straightened and realigned (Brabb et al. 2000). Artificial stream channels are found throughout Mountain View and underlie an eastern portion of the project area. Artificial stream channels are created by human activities and therefore cannot preserve paleontological resources. Brabb et al. (2000) did not identify how thick the artificial stream channels are, but due to the artificial stream channels' depositional environment and rate of sedimentation, it is assumed it extends at least 5 feet deep. Beyond this 5-foot depth, older geologic units that are paleontologically sensitive may occur, but this transition depth is an assumption. Therefore, artificial stream channels have no paleontological sensitivity from surface level to 5 feet deep and an undetermined paleontological sensitivity deeper than 5 feet.

Bay mud

Bay mud consists of water-saturated estuarine mud, predominantly gray, green and blue clay and silty clay underlying marshlands and tidal mud flats (Brabb et al. 2000). Bay mud is found throughout Mountain View and underlies a portion of the northern project area. Bay mud is Holocene in age, which is generally considered too young (i.e., less than 5,000 years old) to preserve scientifically significant paleontological resources (SVP 2010). Brabb et al. (2000) estimates the bay mud thickness may reach up to 40m near the north County line. Due to the bay mud's depositional environment and rate of sedimentation, it is assumed it extends at least 5 feet deep across the entire project area. Beyond this 5-foot depth, older geologic units that are paleontologically sensitive may occur, but this transition depth is an assumption. Therefore, basin deposits have a low paleontological sensitivity from surface level to 5 feet deep and an undetermined paleontological sensitivity deeper than 5 feet.

Quaternary Basin Deposits

Basin deposits consist of very fine silty clay to clay deposits occupying flat-floored basins at the distal edge of alluvial fans adjacent to the bay mud. It also contains unconsolidated, locally organic, plastic silt and silty clay deposited in very flat valley floors (Brabb et al. 2000). Basin deposits are found throughout Mountain View and underlie a central portion of the project area. Basin deposits are Holocene in age, which are generally considered too young (i.e., less than 5,000 years old) to preserve scientifically significant paleontological resources (SVP 2010). Brabb et al. (2000) did not identify how thick the basin deposits are, but due to the basin's depositional environment and rate of sedimentation, it is assumed it extends at least 5 feet deep. Beyond this 5-foot depth, older geologic units that are paleontologically sensitive may occur, but this transition depth is an assumption. Therefore, basin deposits have a low paleontological sensitivity from surface level to 5 feet deep and an undetermined paleontological sensitivity deeper than 5 feet.

Quaternary Flood-plain Deposits

Quaternary flood-plain deposits consist of medium- to dark-gray, dense, sandy to silty clay with localized lenses of coarser material (silt, sand, and pebbles) (Brabb et al. 2000). Quaternary flood-plain deposits are found throughout Mountain View and underlie the western portion of the project area. Quaternary flood-plain deposits are Holocene in age, which are generally considered too young (i.e., less than 5,000 years old) to preserve scientifically significant paleontological resources (SVP 2010). Brabb et al. (2000) did not identify how thick the Quaternary flood-plain deposits are, but due to the Quaternary flood-plain deposits' depositional environment and rate of

sedimentation, it is assumed it extends at least 5 feet deep. Beyond this 5-foot depth, older geologic units that are paleontologically sensitive may occur, but this transition depth is an assumption. Therefore, flood-plain deposits have a low paleontological sensitivity from surface level to 5 feet deep and an undetermined paleontological sensitivity deeper than 5 feet.

Quaternary natural levee deposits

Quaternary natural levee deposits consist of loose, moderately to well-sorted sandy or clayey silt grading to sandy or silty clay (Brabb et al. 2000). Quaternary natural levee deposits are found throughout Mountain View and underlie a southeastern portion of the project area. Quaternary natural levee deposits are Holocene in age which are generally considered too young (i.e., less than 5,000 years old) to preserve scientifically significant paleontological resources (SVP 2010). Brabb et al. (2000) did not identify how thick the Quaternary natural levee deposits are, but due to the natural levee deposits' depositional environment and rate of sedimentation, it is assumed it extends at least 5 feet deep. Beyond this 5-foot depth, older geologic units that are paleontologically sensitive may occur, but this transition depth is an assumption. Therefore, Quaternary natural levee deposits have a low paleontological sensitivity from surface level to 5 feet deep and an undetermined paleontological sensitivity deeper than 5 feet.

Alluvial fan and fluvial deposits (Holocene)

Alluvial fan and fluvial deposits (Holocene) consist of brown or tan, medium-dense to dense, gravelly sand or sandy gravel that generally grades upward to sandy or silty clay (Brabb et al. 2000). Brabb et al. (2000) also states that near the distal fan edges, which occur where alluvial fan and fluvial deposits (Holocene) meet basin deposits, the fluvial deposits are typically brown, never reddish, medium-dense sand that fines upward to sandy or silty clay. Alluvial fan and fluvial deposits (Holocene) are found throughout Mountain View and underlie a southern portion of the project area. Alluvial fan and fluvial deposits that are Holocene in age are generally considered too young (i.e., less than 5,000 years old) to preserve scientifically significant paleontological resources (SVP 2010). Brabb et al. (2000) did not identify how thick the alluvial fan and fluvial deposits (Holocene) are, but due to the alluvial fan and fluvial deposits' depositional environment and rate of sedimentation, it is assumed it extends at least 5 feet deep. Beyond this 5-foot depth, older geologic units that are paleontologically sensitive may occur, but this transition depth is an assumption. Therefore, alluvial fan and fluvial deposits (Holocene) have a low paleontological sensitivity from surface level to 5 feet deep and an undetermined paleontological sensitivity deeper than 5 feet.

Alluvial fan and fluvial deposits (Pleistocene)

Alluvial fan and fluvial deposits (Pleistocene) consist of brown, dense, gravelly and clayey sand or clayey gravel that fines upward to sandy clay (Brabb et al. 2000). They are distinguished from younger alluvial fans and fluvial deposits by higher topographic position, greater degree of dissection, and stronger soil profile development. Maximum thickness is unknown but at least 50 m (Brabbs et al. 2000). Alluvial fan and fluvial deposits (Pleistocene) are found throughout Mountain View and underlie a western portion of the project area. Pleistocene-aged alluvial sediments are known to produce paleontological resources in Santa Clara County, including mastodon (*Mammut*), horse (*Equus*), bison (*Bison*), and camels (Camelidae) (Jefferson 2010; Paleobiology Database 2025; University of California Museum of Paleontology 2025). Due to this fossil-producing history, alluvial fan and fluvial deposits (Pleistocene) have high paleontological sensitivity.

4.5.2 Regulatory Setting

a. Federal Regulations

National Earthquake Hazards Reduction Program

The National Earthquake Hazards Reduction Program was established by the United States Congress when it passed the Earthquake Hazards Reduction Act of 1977, Public Law 95-124. In establishing the National Earthquake Hazards Reduction Program, Congress recognized earthquake-related losses could be reduced through improved design and construction methods and practices, land use controls and redevelopment, prediction techniques and early warning systems, coordinated emergency preparedness plans, and public education and involvement programs. The four basic goals are as follows:

- Develop effective practices and policies for earthquake loss reduction and accelerate their implementation.
- Improve techniques for reducing earthquake vulnerabilities of facilities and systems.
- Improve earthquake hazards identification and risk assessment methods, and their use.
- Improve the understanding of earthquakes and their effects.

Several key federal agencies contribute to earthquake mitigation efforts. There are four primary National Earthquake Hazards Reduction Program agencies:

- National Institute of Standards and Technology of the Department of Commerce
- National Science Foundation
- USGS
- Federal Emergency Management Agency

Implementation of National Earthquake Hazards Reduction Program priorities is accomplished primarily through original research, publications, and recommendations to assist and guide state, regional, and local agencies in the development of plans and policies to promote safety and emergency planning.

Landslide Hazard Program

USGS created the Landslide Hazard Program in the mid-1970s; the primary objective of the program is to reduce long-term losses from landslide hazards by improving our understanding of the causes of ground failure and suggesting mitigation strategies. The federal government takes the lead role in funding and conducting this research, whereas the reduction of losses due to geologic hazards is primarily a state and local responsibility. In Monterey County, plans and programs designed for the protection of life and property are coordinated by the Monterey County Health Department.

Clean Water Act

Congress enacted the Clean Water Act (CWA), formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination

System (NPDES) permit process (CWA Section 402). NPDES permitting authority in California is administered by the California State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards on behalf of the United States Environmental Protection Agency. Pacific Grove is within the jurisdiction of the Central Coast Regional Water Quality Control Board.

While the CWA is primarily associated with protecting and enhancing surface water quality, some regulatory provisions of the CWA help to control erosion and soil loss and compliance with these provisions can help mitigate potential impacts to geology and soils. In particular, the SWRCB administers the NPDES Construction General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction Stormwater General Permit) (Order 2022-0057-DWQ). The Construction General Stormwater Permit is discussed further below in b., *State Regulations*.

Disaster Mitigation Act of 2000

Congress passed the Disaster Mitigation Act of 2000 to amend the Robert T. Stafford Disaster Relief and Emergency Assistance Act by invoking new and revitalized approaches to mitigation planning. Section 322 of the act emphasizes the need for state and local government entities to closely coordinate mitigation planning activities and makes the development of a hazard mitigation plan a specific eligibility requirement for any local government applying for federal mitigation grant funds. Communities with an adopted and federally-approved hazard mitigation plan thereby become pre-positioned and more apt to receive available mitigation funds before and after the next declared disaster. To implement the new Stafford Act provisions, the Federal Emergency Management Agency published requirements and procedures for local hazard mitigation plans in the Code of Federal Regulations (CFR) at Title 44, Chapter 1, Part 201.6. These regulations specify minimum standards for developing, updating, and submitting local hazard mitigation plans for Federal Emergency Management Agency review and approval at least once every five years.

National Environmental Policy Act of 1969 (NEPA)

The National Environmental Policy Act (NEPA), as amended, directs federal agencies to "Preserve important historic, cultural, and natural aspects of our national heritage" (Section 101(b) (4)). The current interpretation of this language has included scientifically important paleontological resources among those resources that may require preservation.

b. State Regulations

California Building Code

Part 2 of Title 24 of the California Code of Regulations is the CBC, a set of regulations that governs the design and construction of buildings in California. The purpose of the CBC is to establish minimum standards to safeguard public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of building and structures. The CBC contains specific requirements for seismic safety, excavation, foundations, retaining walls, and site demolition. It also regulates grading activities, including drainage and erosion control. Chapter 16 of the CBC contains definitions of seismic sources and the procedure used to calculate seismic forces on structures. The earthquake design requirements of the CBC take into account the occupancy category of the structure, site class, soil classifications, and various seismic coefficients, which are used to determine a Seismic Design Category (SDC) for a project. The SDC is a classification system that combines the

occupancy categories with the level of expected ground motions at the site and ranges from SDC A (very small seismic vulnerability) to SDC E/F (very high seismic vulnerability and near a major fault). Design specifications are then determined according to the SDC. Chapter 18 of the CBC establishes requirements for geotechnical investigations, site preparation, and foundation design for structural stability. It includes various standards, including for determining load-bearing capacities and evaluating soil conditions, and includes regulations for mitigating seismic hazards such as liquefaction.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 was passed into law following the destructive February 9, 1971, San Fernando earthquake that had a moment magnitude (Mw) of 6.6. The main purpose of the act is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards. The law requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps, known as Alquist-Priolo maps (CGS 2025a). The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Generally, structures for human occupancy must be set back from active faults by approximately 50 feet. Therefore, if a project area is in an active earthquake fault zone, the local agency must withhold development permits until geologic investigations demonstrate the site is not threatened by surface displacement from future faulting. The City of Pacific Grove does not contain any active Alquist-Priolo Earthquake Fault Zones.

Seismic Safety Act

The Seismic Safety Act established the California Seismic Safety Commission in 1975 with the intent of providing oversight, review, and recommendations to the Governor and State Legislature regarding seismic issues. The commission's name was changed to the Alfred E. Alquist Seismic Safety Commission in 2006. Since then, the Commission has adopted several documents based on recorded earthquakes, such as the 1906 San Francisco earthquake and the 1989 Loma Prieta earthquake.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (Public Resources Code [PRC] Chapter 7.8, Section 2690-2699.6) was passed into law following the destructive October 17, 1989, 6.9 magnitude Loma Prieta earthquake. The act directs CGS to delineate Seismic Hazard Zones. In accordance with the mapping criteria, the CGS seismic hazard zone maps identify areas with the potential for a ground shaking event that corresponds to a 10-percent probability of exceedance in 50 years. The purpose of the act is to reduce the negative implications of seismic hazards to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and state agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. The act requires site-specific preparation of geotechnical investigations under certain circumstances, including mitigation measures based on site-specific conditions, prior to permitting most urban development projects in seismic hazard zones.

California Public Resources Code Section 5097.5

PRC Section 5097.5 states "no person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface" any "vertebrate paleontological site" on public lands without the

"permission of the public agency having jurisdiction over such lands." Violation of this section is a misdemeanor. As used in PRC Section 5097.5, "public lands" means lands owned by or under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with PRC Section 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others.

Construction Stormwater General Permit

The *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction Stormwater General Permit), adopted by SWRCB, regulates construction activities that include clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area. The Construction Stormwater General Permit authorizes the discharge of stormwater to surface waters from construction activities and requires all developers of land where construction activities will occur over more than one acre to do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the Construction Stormwater General Permit;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States;
- Develop and implement a SWPPP that specifies construction best management practices (BMPs) that will reduce pollution in stormwater discharges to the Best Available Technology/Economically Achievable/Best Conventional Pollutant Control Technology standards;
- Perform inspections and maintenance of all BMPs; and
- Conduct stormwater sampling, if required based on risk level.

To obtain coverage under the Construction Stormwater General Permit, a project applicant must electronically file all permit registration documents with SWRCB prior to the start of construction. Permit registration documents must include a Notice of Intent, Risk Assessment, site map, SWPPP, annual fee, and signed certification statement.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, control discharges from groundwater dewatering, and control pollutants from construction materials. The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

The Construction Stormwater General Permit also includes groundwater dewatering requirements for projects not covered under a De Minimis or Low Threat Discharge Permit. The dewatering requirements mandate dischargers to implement BMPs to control the volume and velocity of dewatering discharges. The Construction Stormwater General Permit also requires testing and treatment, if necessary, of groundwater discharge to verify the discharge meets or exceeds the effluent limitations specified in the permit.

c. Local Regulations

Mountain View 2030 General Plan

The Historic Preservation Element of the Mountain View 2030 General Plan contains the following goal and policy addressing the preservation of paleontological resources.

Goal LUD-11: Preserved and protected important historic and cultural resources.

> **Policy LUD 11.5 Archaeological and paleontological site protection**. Require all new development to meet state codes regarding the identification and protection of archaeological and paleontological deposits.

Goal PSA-5: The protection of life and property from seismic hazards.

> **Policy PS-5.1 New development**. Ensure new development addresses seismically induced geologic hazards.
>
> **Policy PS-5.2 Alquist-Priolo zones.** Development shall comply with the Alquist-Priolo Earthquake Fault Zoning Act.
>
> **Policy PS**-5.4 Utility Design. Ensure new underground utilities, particularly water and natural gas lines, are designed to meet current seismic standards.

Mountain View Municipal Code (MVCC)

Chapter 8 of the Mountain View City Code (MVCC) requires compliance with the California Building Code, 2022 edition, which incorporates, by adoption the 2021 edition of the International Building Code published by the International Code Council, with amendments specific to California. This code establishes designs for structural integrity, including in a seismically active area.

Mountain View Standard Conditions of Approval

State of California Construction General Stormwater Permit

A "Notice of Intent" (NOI) and "Stormwater Pollution Prevention Plan" (SWPPP) shall be prepared for construction projects disturbing one (1) acre or more of land. Proof of coverage under the State General Construction Activity Stormwater Permit shall be attached to the building plans.

Construction Sediment and Erosion Control Plan

The applicant shall submit a written plan acceptable to the City which shows controls that will be used at the site to minimize sediment runoff and erosion during storm events. The plan should include installation of the following items where appropriate: (a) silt fences around the site perimeter; (b) gravel bags surrounding catch basins; (c) filter fabric over catch basins; (d) covering of exposed stockpiles; (e) concrete washout areas; (f) stabilized rock/gravel driveways at points of egress from the site; and (g) vegetation, hydroseeding, or other soil stabilization methods for high-erosion areas. The plan should also include routine street sweeping and storm drain catch basin cleaning.

Geotechnical Report

The applicant shall have a design-level geotechnical investigation prepared which includes recommendations to address and mitigate geologic hazards in accordance with the specifications of

California Geological Survey (CGS) Special Publication 117, *Guidelines for Evaluating and Mitigating Seismic Hazards*, and the requirements of the Seismic Hazards Mapping Act. The report will be submitted to the City during building plan check, and the recommendations made in the geotechnical report will be implemented as part of the Project and included in building permit drawings and civil drawings as needed. Recommendations may include considerations for design of permanent below-grade walls to resist static lateral earth pressures, lateral pressures causes by seismic activity, and traffic loads; method for backdraining walls to prevent the build-up of hydrostatic pressure; considerations for design of excavation shoring system; excavation monitoring; and seismic design.

Discovery of Paleontological Resources

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

Soils Report

As required by the State Seismic Hazards Mapping Act, a project site-specific geotechnical investigation shall be conducted by a registered soils/geologist identifying any seismic hazards and recommending mitigation measures to be taken by the Project. The applicant, through the applicant's registered soils engineer/geologist, shall certify the project complies with the requirements of the State Seismic Hazards Mapping Act. Indicate the location (page number) within the geotechnical report of where this certification is located, or provide a separate letter stating such.

4.5.3 Impact Analysis

Methodology and Significance Thresholds

Methodology

The Project's impacts related to geology and soils are evaluated based on a review of the underlying geology and soil conditions in the project area; the Project's adherence to local, state, and federal requirements; the nature of proposed soil disturbance, construction and operational activities, and its potential to expose people or structures to geologic hazards, including fault rupture, ground shaking, liquefaction, landslides, erosion, lateral spreading, subsidence, collapse, and expansive soils; the nature of proposed development and its potential to require on-site wastewater systems; and the potential for the project to uncover and/or destroy a unique paleontological resource.

Paleontological Resources Sensitivity

Absent specific agency guidelines, most professional paleontologists in California adhere to guidelines set forth by the Society of Vertebrate Paleontology in its "Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources" (SVP 2010). These guidelines establish detailed protocols for the assessment of the paleontological resource potential,

or "sensitivity" of a project area and outline measures to follow in order to mitigate adverse impacts to known or unknown fossil resources during Project development. Using baseline information gathered during a paleontological resource assessment, the paleontological resource potential of the geologic unit(s) or members thereof underlying a project area can be assigned to a high, undetermined, low, or no paleontological sensitivity category. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. While these standards were specifically written to protect vertebrate paleontological resources, all fields of paleontology have adopted these guidelines.

Significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, rare, diagnostically important, or are common but have the potential to provide valuable scientific information for evaluating evolutionary patterns and geologic processes. New or unique specimens can provide new insights into evolutionary history; however, additional specimens of even well-represented lineages can be equally important for studying evolutionary patterns and processes, and evolutionary rates. As such, common fossils, especially vertebrates, may be scientifically important, and therefore considered highly significant.

In general, for geologic units with high sensitivity, full-time monitoring is recommended during any Project-related ground disturbance. For geologic units with low or no sensitivity, protection or salvage efforts are not required. For geologic units with undetermined sensitivity, field surveys by a qualified paleontologist are usually recommended to specifically determine the paleontological potential of the rock units present within the project area.

Rincon assessed the paleontological sensitivity of each of the geologic units underlying the project area to SVP (2010) guidelines. The sensitivity assignments were made based on review of primary scientific literature, geologic maps, and online fossil databases.

Significance Thresholds

To determine impacts related to geology and soils, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    a. 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,
    b. Strong seismic ground shaking,
    c. Seismic-related ground failure, including liquefaction,
    d. Landslides;
2. Result in substantial soil erosion or the loss of topsoil;
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;
4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property;
5. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; and/or

6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Project Impacts and Mitigation Measures

Threshold 1a: 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?

Threshold 1b: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Threshold 1c: 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?

Threshold 1d: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Threshold 3: 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?

Threshold 4: Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impact GEO-1 NONE OF THE R3 ZONING DISTRICT UPDATE SITES ARE WITHIN AN ALQUIST-PRIOLO ZONE, SO SURFACE OR GROUND RUPTURE WOULD NOT OCCUR. DEVELOPMENT COULD EXPERIENCE SEISMIC HAZARDS INCLUDING GROUND SHAKING, LIQUEFACTION, OR LANDSLIDES, POSING RISKS TO STRUCTURES AND PUBLIC SAFETY. HOWEVER, COMPLIANCE WITH APPLICABLE REGULATIONS WOULD REDUCE THESE RISKS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Ground Rupture

Several faults are located near the R3 Zoning District Update sites (see Figure 4.5-1). As discussed above under Section 4.5.1, *Environmental Setting*, none of the R3 Zoning District Update sites are on or directly adjacent to an Alquist-Priolo Fault Zone. Therefore, development facilitated by the Proposed Project would not be subject to surface or ground rupture as development would not be located in a fault zone and impacts would be less than significant.

Seismic Ground Shaking

As with any site in the Bay Area region, the R3 District Zoning Update sites are susceptible to strong seismic ground shaking in the event of a major earthquake. Nearby inactive faults include the Stanford Fault, the San Jose Fault, and the Cascade Fault, and the San Andreas fault is located approximately six miles south of Mountain View. These faults are potentially capable of producing strong seismic ground shaking within the city. Due to the proximity to these fault zones, new

developments proposed under the R3 Zoning District Update would be subject to strong seismic ground shaking in the event of an earthquake originating from one of the previously mentioned fault zones. The intensity of such an event would depend on the causative fault and the distance to the epicenter, the magnitude, the duration of shaking, and the nature of the geologic materials on which the Project components would be constructed.

Although it remains a possibility that residences and infrastructure fail under seismic stress, proper engineering can minimize the risk to life and property. Accordingly, building standards have been developed for construction in areas subject to seismic ground-shaking. Development under the Proposed Project must adhere to California Building Code seismic safety restrictions. The requirements of the California Building Code ensure that new habitable structures are engineered to withstand the expected ground acceleration at a given location. In addition, the City of Mountain View's City Code requires compliance with CBC regulations, and the City's General Plan Public Safety Element contains policies that would reduce damage resulting from seismic hazards, such as policies PSA-5.1, PSA-5.2, and PSA-5.4, which require development to address seismically induced geologic hazards, comply with the Alquist-Priolo Earthquake Fault Zoning Act and that underground utilities are designed to meet seismic standards. Further, the Project would promote infill development, which may involve replacing older buildings subject to seismic damage with newer structures built to current seismic standards that could better withstand the adverse effects of strong ground shaking. Although the risk of sustaining an earthquake with higher ground accelerations can never be completely eliminated, compliance with all applicable provisions of the California Building Code, the MVCC, and the Mountain View General Plan would ensure that potential impacts from ground-shaking would be minimized to the extent possible. Conformance with the requirements of the California Building Code, MVCC, and General Plan policies would reduce impacts related to seismic ground shaking to be less than significant.

Liquefaction

As mentioned above under Section 4.5.1, *Environmental Setting*, liquefaction is a potential hazard associated with certain types of soils and subsurface conditions. Liquefaction occurs when saturated or partially saturated and unconsolidated soils lose strength in response to stress, typically an earthquake. This phenomenon can result in damage to infrastructure and foundations. Similarly, seismically-induced settlement, or the potential for the ground surface to lower/settle, is an existing geologic hazard that typically occurs where loose- to medium-density unconsolidated soils are located above groundwater; settlement can also be induced or exacerbated by the improper placement of artificial fill, or the placement of structures on soils or bedrock with differential settlement rates.

As shown on Figure 4.5-2, several of the R3 Zoning District Update sites are in liquefaction hazard zones. Overall, the Proposed Project would facilitate development on sites subject to low to very high liquefaction risk. Proper engineering and modern construction techniques and required compliance with the geology and soil provisions of the CBC, which sets forth seismic design standards (Chapters 16, 18) and geohazard study requirements (Chapter 18) would address liquefaction hazards. In addition, as required by Mountain View Standard Conditions of Approval, a site-specific Geotechnical Report and a Soils Report would be required for individual developments. As part of this process, developers would be required to retain a licensed geotechnical engineer to assess each site and design structures to withstand seismic-related hazards, including liquefaction. As such, developments would be designed in compliance with a detailed, site-specific geotechnical study prepared by a California-licensed geotechnical engineer, ensuring consistency with seismic

safety recommendations. Liquefaction risks can typically be addressed through site preparation or foundation design techniques, such as removing and replacing liquefiable soils, compacting them to increase stability, or applying specialized foundation design recommendations. Therefore, through compliance with Mountain View Standard Conditions of Approval, CBC requirements, and City Code requirements, impacts related to liquefaction would be less than significant.

Landslides

Earthquakes can trigger landslides that may cause injuries and damage to people and structures. Landslides are typically hazards on or near slopes or hillside areas, rather than generally level areas like the city of Mountain View and vicinity. There are no areas of moderate to high landslide potential in Mountain View based on soil stability levels (CGS 2025c). No significant landslides have been recorded in the city, and no significant areas of landslide susceptibility have been identified. While the landslide potential is low, the Mountain View Standard Conditions of Approval requires a site-specific Geotechnical Report and a Soils Report which would inform the structural and geotechnical engineering as it related to slope stability, as required by the CBC and City codes. Impacts would be less than significant.

Unstable or Expansive Soils

Seismic hazards in Mountain View also include the potential for unstable or expansive soils to result in damage to existing or proposed infrastructure, and/or to introduce potential hazards to human health and safety. Unstable soils may include any materials not capable of supporting a selected land use. Site-specific geotechnical evaluations would be conducted for individual as required under the Seismic Hazard Mapping Act as the Proposed Project builds out. Compliance with MVCC and other standards discussed in this section would minimize potential adverse effects.

In addition, future development on the R3 District Zoning Update sites would be required to comply with Mountain View Standard Conditions of Approval for the preparation of site-specific Geotechnical and Soils Reports, and General Plan Policy PSA-5.1, which requires development to address seismically induced geologic hazards. Compliance with the Mountain View Standard Conditions of Approval which requires a site-specific Geotechnical Report and a Soils Report, the CBC, and City codes requirement to determine the potential for expansive soils for each individual new development under the Proposed Project would ensure that all problematic soils are identified, and soil engineering requirements are implemented.

Future development on the R3 District Zoning Update sites in areas with identified hazards would be required to appropriately address and be designed to withstand associated hazards to the maximum extent feasible. In general, the Proposed Project could facilitate projects that would replace older buildings subject to seismic damage with newer structures built to current seismic standards that could better withstand the adverse effects associated with unstable soils and impacts would be less than significant. Therefore, with adherence to the requirements of the applicable City standard conditions of approval, the CBC, and City codes, and geotechnical investigation, impacts related to unstable or expansive soils would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation measures are required.

Threshold 2:	Would the project result in substantial soil erosion or the loss of topsoil?

Impact GEO-2 WITH ADHERENCE TO APPLICABLE LAWS AND REGULATIONS, THE PROPOSED PROJECT WOULD NOT RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The R3 Zoning District Update sites are generally developed and flat, which limits the potential for substantial soil erosion. Ground disturbing activities that would occur during the grading and excavation phase of construction could involve exposing soils, and as a result temporary erosion could occur. However, future development under the Proposed Project would be required to comply with Mountain View Standard Conditions of Approval, which require developers to retain a licensed geotechnical engineer to prepare site-specific Geotechnical and Soils Reports, and MVCC Chapter 8, which requires compliance with CBC regulations for structural integrity in seismically active areas, prior to any ground disturbing activities. In addition, future development would be required to comply with erosion control standards administered by the San Francisco Bay RWQCB through the NPDES permit process, which requires implementation of nonpoint source control of stormwater runoff. Furthermore, as mentioned under Section 4.2, *Air Quality*, future development under the Proposed Project would be required to comply with all applicable Bay Area Air Quality Management District (BAAQMD) dust control measures for new construction, which also include measures to minimize or avoid erosion and loss of topsoil, and Mountain View Standard Conditions of Approval that require compliance with BAAQMD regulations. Additional information related to the prevention of stormwater-induced erosion is provided in the analysis in Section 4.8, *Hydrology and Water Quality.* Compliance with these requirements would ensure that impacts of future development on the R3 District Zoning Update sites associated with soil erosion and the loss of topsoil would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation measures are required.

Threshold 5:	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?

Impact GEO-3 THE PROPOSED PROJECT WOULD NOT INCLUDE SEPTIC TANKS OR ALTERNATIVE WASTEWATER DISPOSAL SYSTEMS. NO IMPACT WOULD OCCUR.

Future development on the R3 District Zoning Update sites would be connected to the local wastewater treatment system. Septic systems or alternative wastewater systems would not be used. No impact would occur.

Mitigation Measures

No impact would occur. No mitigation measures are required.

Threshold 6:	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact GEO-4 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT HAS THE POTENTIAL TO IMPACT PALEONTOLOGICAL RESOURCES. NONETHELESS, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

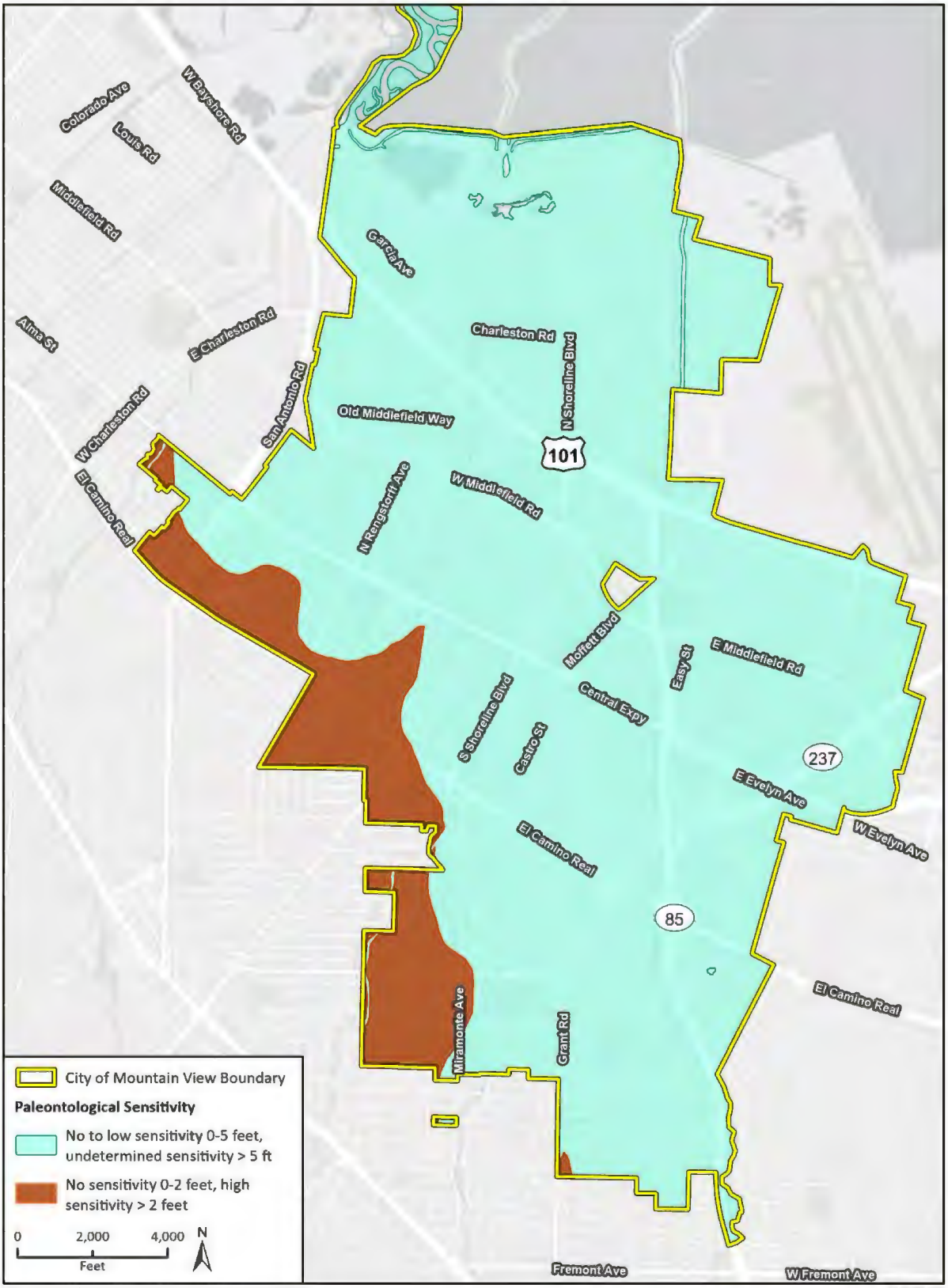
Consistent with SVP (2010) guidelines, the paleontological sensitivity of the six geologic units underlying the R3 Zoning District Update areas was evaluated using geologic maps, a literature review, and online fossil locality databases. The age and paleontological sensitivity of these geologic units are summarized in Table 4.5-1 and shown on Figure 4.5-4.

Ground-disturbing activities within previously undisturbed sediments with high or undetermined paleontological sensitivity could result in significant impacts to paleontological resources. Impacts would be significant if construction activities result in the destruction, damage, or loss of scientifically important paleontological resources and associated stratigraphic and paleontological data.

Table 4.5-1 Geologic Units in R3 Zoning Update Project Area and Paleontological Sensitivity

Geologic Unit	Age	Paleontological Sensitivity
Artificial fill	Historic	No to low sensitivity 0-5 feet, undetermined sensitivity >5 ft
Artificial levee fill	Historic	No to low sensitivity 0-5 feet, undetermined sensitivity >5 ft
Artificial stream channels	Historic	No to low sensitivity 0-5 feet, undetermined sensitivity >5 ft
Bay mud	Holocene	No to low sensitivity 0-5 feet, undetermined sensitivity >5 ft
Basin deposits	Holocene	No to low sensitivity 0-5 feet, undetermined sensitivity >5 ft
Flood-plain deposits	Holocene	No to low sensitivity 0-5 feet, undetermined sensitivity >5 ft
Natural levee deposits	Holocene	No to low sensitivity 0-5 feet, undetermined sensitivity >5 ft
Alluvial fan and fluvial deposits (Holocene)	Holocene	No to low sensitivity 0-5 feet, undetermined sensitivity >5 ft
Alluvial fan and fluvial deposits (Pleistocene)	Pleistocene	No sensitivity 0-2 feet, high sensitivity >3 ft

Figure 4.5-4 Geologic Units and Paletological Senstivity



Adverse effects to paleontological resources can only be determined once a specific project has been proposed because the effects are highly dependent on both the individual project site conditions (i.e., previous history of development) and the characteristics of the proposed ground-disturbing activity (i.e., depth, excavation type). As shown in Figure 4.5-3, areas of higher paleontological sensitivity are concentrated in the southwestern portion of the city. The majority of the R3 Zoning District Update sites are dispersed throughout the city in areas of low to zero paleontological sensitivity to a depth of 5 feet; however, several sites are located within the area of high paleontological sensitivity at a depth of 2 feet. In particular, sites within Change Areas 1, 2, and 7, and sites immediately surrounding El Camino Real west of Miramonte Avenue, would facilitate development in an area of higher paleontological sensitivity. Ground-disturbing activities associated with construction facilitated by the R3 Zoning District Update have the potential to damage or destroy paleontological resources that may be present on or below the ground surface in undisturbed sediments with high or undetermined paleontological sensitivity. Although most of the Change Areas have been developed for urban use, future excavations in these areas could impact undisturbed sediments with high or undetermined paleontological sensitivity if those excavations reach deeper than prior development activities. To reduce impacts to paleontological resources, the Mountain View Standard Condition of Approval for Discovery of Paleontological Resources would be required in the event of a fossil discovery during construction to ensure that construction is halted, and a qualified paleontologist assesses the find to determine its significance. However, damage to or destruction of fossils could still occur due to development under the R3 Zoning District Update. Implementation of Mitigation Measure GEO-1 would be required.

Mitigation Measures

GEO-1 Paleontological Resources Protection

For projects that involve substantial excavation in undisturbed sediments greater than 2 feet below the surface in areas mapped as alluvial fan and fluvial deposits (Pleistocene), or greater than 5 feet below the surface in areas mapped as artificial fill, artificial levee fill, artificial stream channels, Bay Mud, basin deposits, flood-plain deposits, natural levee deposits, or alluvial fan and fluvial deposits (Holocene), as mapped in Figure 4.5-4, the applicant shall prepare and implement a Paleontological Resources Mitigation and Monitoring Plan (PRMMP) or implement the following measures:.

- **Worker Environmental Awareness Program (WEAP) Training.** The Qualified Paleontologist or their designee shall conduct WEAP training for all construction personnel involved in ground-disturbing activities, regarding the appearance of fossils and the procedures for notifying paleontological staff in the event that fossils are discovered by on-site personnel.
- **Construction Monitoring.** Monitoring during ground construction activities (i.e., grading, trenching, foundation work, and other excavations) shall be conducted by a qualified paleontological monitor, who is defined as an individual who meets the minimum qualifications per standards set forth by the SVP (2010), which includes a B.S. or B.A. degree in geology or paleontology with one year of monitoring experience and knowledge of collection and salvage of paleontological resources. Full-time paleontological monitoring shall occur for ground-disturbing activities in undisturbed sediments with high paleontological sensitivity. Initial, part-time monitoring shall occur in undisturbed sediments with undetermined paleontological sensitivity to determine whether the sediments should be considered high- or low-sensitivity. The frequency and duration of this initial part-time monitoring shall be at the discretion of the Qualified Paleontologist. If the Qualified Paleontologist determines that the monitoring methods or schedule should be altered based on the specific geologic conditions at the surface

or at depth (e.g., reduced/increased in frequency, ceased entirely), the Qualified Paleontologist may recommend such changes to the City, and those changes shall not be enacted until the City's approval is received.

- **Paleontological Discovery.** In the event a fossil is discovered by construction personnel or the paleontological monitor, all work in the immediate vicinity of the find shall cease and the Qualified Paleontologist shall be contacted to evaluate the find before re-starting work in the area. If it is determined that the fossil(s) is (are) scientifically significant, then it shall be salvaged, identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps.

Significance After Mitigation

Mitigation Measure GEO-1 requires development facilitated by the Project that may impact geologic units with high or undetermined paleontological sensitivity to undergo project-specific assessment, and, where potential for impacts are identified, to implement mitigation measures to reduced identified impacts, including training of construction personnel, paleontological monitoring, and procedures for an unanticipated paleontological resource discovery. With implementation of Mitigation Measure GEO-1, impacts to paleontological resources would be less than significant.

4.5.4 Cumulative Impacts

IMPACT GEO-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD NOT RESULT IN A CUMULATIVELY SIGNIFICANT IMPACT RELATED TO SEISMIC GROUND SHAKING OR SURFACE RUPTURE, LIQUEFACTION OR OTHER SOIL INSTABILITY HAZARDS, LANDSLIDES, SOIL EROSION OR LOSS OF TOPSOIL, OR SOILS INCAPABLE OF SUPPORTING WASTEWATER DISPOSAL SYSTEMS; HOWEVER, CUMULATIVE DEVELOPMENT COULD RESULT IN A POTENTIALLY SIGNIFICANT IMPACT TO UNDISCOVERED PALEONTOLOGICAL RESOURCES. WITH IMPLEMENTATION OF APPLICABLE STANDARD CONDITIONS OF APPROVAL AND MITIGATION MEASURES, CUMULATIVE GEOLOGY AND SOILS IMPACTS WOULD BE LESS THAN SIGNIFICANT, AND THE CONTRIBUTION OF THE PROJECT WOULD NOT BE CUMULATIVELY CONSIDERABLE.

The geographic scope of the cumulative geology and soils analysis is the project area and the surrounding vicinity. Adverse effects associated with geology and soils impacts tend to be localized; therefore, an area generally within a 0.25-mile radius of the project area would be the area most affected by activities in combination with the Project. In addition, adverse effects associated with paleontological resource impacts tend to be localized, because the integrity of the given resource depends on what occurs only in the immediate vicinity around that resource, such as disruption of soils. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Setting*) located in Mountain View and surrounding areas in addition to the Project.

Cumulative projects have the potential to experience strong to violent ground shaking and/or surface rupture from earthquakes. Cumulative projects would be required to adhere to the provisions of the CBC and policies of applicable general plans and municipal codes, reducing potential hazards associated with seismic ground shaking and ground failure. Therefore, cumulative impacts related to surface rupture (Threshold 1[a]) and seismic ground shaking (Threshold 1[b]) would be less than significant.

Soil hazards associated with cumulative projects, such as liquefaction and expansive soils, are specific to individual sites and generally do not contribute to a cumulative effect. Cumulative development would be subject to applicable General Plan policies, Standard Conditions of Approval, city code requirements, and CBC requirements related to reducing seismic and soil-related hazards such as liquefaction, lateral spreading, collapse, and expansive soils. Other current and future development or redevelopment projects in the region would similarly be required to adhere to standards and practices that include stringent geologic and soil-related hazard mitigations. Therefore, cumulative impacts related to liquefaction (Threshold 1[c]), lateral spreading, collapse (Threshold 3), and expansive soils (Threshold 4) would be less than significant.

The geographic scope for cumulative landslide impacts does not contain a landslide hazard zone. Landslide hazards associated with cumulative projects are specific to individual sites and generally do not contribute to a cumulative effect. Ground-disturbing activities associated with cumulative development would be subject to the applicable state and City Code and CBC requirements to minimize the risk to life or property associated with landslides. Other current and future development/redevelopment projects in the region would similarly be required to adhere to standards and practices that include stringent geologic and soil-related hazard mitigations related to landslide prevention. Therefore, cumulative impacts related to landslides (Threshold 1[d]) would be less than significant.

Cumulative projects would subject to compliance with the NPDES Construction Stormwater General Permit, which requires the creation and implementation of a SWPPP and corresponding BMPs for projects greater than one acre in size to limit the potential for soil erosion. Additionally, cumulative development would be subject to Mountain View Standard Conditions of Approval for Stormwater Permits, Construction Sediment and Erosion Control Plans, Geotechnical Reports, and Soils Reports. Thus, with regulatory compliance, cumulative impacts related to soil erosion and the loss of topsoil (Threshold 2) would be less than significant.

As described in Impact GEO-3, development facilitated by the Project would not rely on septic systems or on-site alternative wastewater disposal systems and therefore the project would result in no impact related to soils incapable of supporting on-site wastewater systems. Accordingly, the Project has no potential to contribute to cumulative impacts related to soils incapable of supporting on-site wastewater systems, and this impact is not discussed further (Threshold 5).

The potential for impacts to paleontological resources from individual developments is site-specific and depends on the location and extent of ground disturbance associated with each individual development proposal. Areas throughout the cumulative area would continue to develop and involve grading and excavation activities that could encounter paleontological resources. Cumulative development projects would continue to be subject to existing state and local requirements and projects may be subject to project-specific mitigation requirements under CEQA. Ground-disturbing activities have the potential to result in the destruction, damage, or loss of undiscovered scientifically important paleontological resources, particularly in areas of high paleontological sensitivity. Therefore, cumulative impacts to paleontological resources would be potentially significant. Development facilitated by the Project on areas of high paleontological sensitivity would be subject to Mountain View Standard Condition of Approval for the Discovery of Paleontological Resources and would require implementation of Mitigation Measure GEO-1, which would minimize the potential for individual developments projects to cause a substantial adverse change in known or unknown paleontological resources. Therefore, the Project would not have a considerable contribution to cumulative impacts related to the destruction, damage, or loss of undiscovered scientifically important paleontological resources (Threshold 6).

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4.6 Greenhouse Gas Emissions

This section analyzes the Project's potential impacts related to greenhouse gas (GHG) emissions, including the potential for the Proposed Project to generate GHG emissions in excess of standards or to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, associated with the Proposed Project.

4.6.1 Setting

Greenhouse gas emissions and climate change are a cumulative global issue. The United States Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (CARB) regulate GHG emissions within the United States and the State of California, respectively. While CARB has the primary regulatory responsibility within California for GHG emissions, local agencies can also adopt policies for GHG emissions reduction. CARB has divided California into regional air basins. The Project is in Santa Clara County, which is within the San Francisco Bay Area Air Basin (SFBAAB) and under the jurisdiction of the Bay Area Air District (BAAQMD).

Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but climate change is preferred because it conveys that other changes are happening in addition to rising temperatures. The baseline against which these changes are measured originates in historical records that identify temperature, rainfall, and other weather conditions, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record which indicates repeated episodes of substantial warming and cooling. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming over the past 150 years. The United Nations Intergovernmental Panel on Climate Change (IPCC) expressed that the rise and continued growth of atmospheric carbon dioxide (CO_2) concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented acceleration rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatonnes of anthropogenic (manmade) CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius (°C) between the years 2010 through 2019 (IPCC 2021). Furthermore, since the late 1700s, estimated concentrations of CO_2, methane, and nitrous oxide in the atmosphere have increased by over 43 percent, 156 percent, and 17 percent, respectively, primarily due to human activity (U.S. EPA 2021a). Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature.

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of

GHGs because it is short-lived in the atmosphere, and natural processes, such as oceanic evaporation, largely determine its atmospheric concentrations.

GHGs are emitted by natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are usually by-products of fossil fuel combustion, and CH_4 results from off-gassing associated with agricultural practices and landfills. Human-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6 (U.S. EPA 2021a).

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted. This is referred to as "carbon dioxide equivalent" (CO_2e) and is defined as the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (IPCC 2021).[1]

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat-trapping effect of GHGs, the earth's surface would be about 91 degrees Fahrenheit (°F) cooler (World Meteorological Organization 2022).

Global Emissions Inventory

In 2015, worldwide anthropogenic GHG emissions totaled 47,000 million metric tons (MMT) of CO_2e, which is a 43 percent increase from 1990 GHG levels (U.S. EPA 2021b). Specifically, 34,522 MMT of CO_2e of CO_2, 8,241 MMT of CO_2e of CH_4, 2,997 MMT of CO_2e of N_2O, and 1,001 MMT of CO_2e of fluorinated gases were emitted in 2015. The largest source of GHG emissions were energy production and use (includes fuels used by vehicles and buildings), which accounted for 75 percent of the global GHG emissions. Agriculture uses and industrial processes contributed 12 percent and six percent, respectively. Waste sources contributed three percent, and two percent was due to international transportation sources. These sources account for approximately 98 percent because there was a net sink of two percent from land-use change and forestry. (U.S. EPA 2021b).

United States Emissions Inventory

United States GHG emissions were 6,347.7 MMT of CO_2e in 2021 or 5,593.5 MMT CO_2e after accounting for sequestration. Emissions increased by 6.8 percent from 2020 to 2021. The increase from 2020 to 2021 was driven by an increase in CO_2 emissions from fossil fuel combustion which increased seven percent relative to previous years and is primarily due to the economic rebounding after the COVID-19 Pandemic. In 2020, the energy sector (including transportation) accounted for 81 percent of nationwide GHG emissions while agriculture, industrial and waste accounted for approximately 10 percent, six percent, and three percent respectively (USEPA 2023).

[1] The IPCC's (2021) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for methane, consistent with the IPCC's (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWP of 25.

California Emissions Inventory

Based on the CARB California Greenhouse Gas Inventory for 2000-2022, California produced 371.1 MMT of CO_2e in 2022, which is 9.3 MMT of CO_2e lower than 2021 levels. The major source of GHG emissions in California is the transportation sector, which comprises 39 percent of the State of California's total GHG emissions. The industrial sector is the second largest source, comprising 23 percent of the State's GHG emissions while electric power accounts for approximately 16 percent (CARB 2025). The magnitude of California's total GHG emissions is due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions as compared to other states is its relatively mild climate. In 2016, the State of California (State) achieved its 2020 GHG emission reduction target of reducing emissions to 1990 levels as emissions fell below 431 MMT of CO_2e (CARB 2021). The annual 2030 statewide target emissions level is 260 MMT of CO_2e (CARB 2017).

Local Emissions Inventory

The City conducts a GHG inventory to measure GHG emissions generated community-wide and by municipal operations. While emissions from municipal operations make up less than two percent of all emissions generated community-wide, the City strives to provide services to the public more efficiently and reduce its environmental impact. The City reduced emissions from municipal operations by 51 percent between 2005 and 2018. On the other hand, community-wide emissions which are not under the direct control of the City reduced by 14 percent between 2005 and 2019. As of 2019, community-wide GHG emissions totaled 601,980 MT CO_2e. Of the 601,980 MT CO_2e, on-road mobile sources contributed 65 percent; energy consumption contributed 26 percent; solid waste and disposal contributed 2 percent; off-road mobile contributed 7 percent; and wastewater treatment contributed less than 1 percent (City of Mountain View 2021).

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources though potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest on record. The average global land and ocean surface temperature for January 2025 was 1.33°C (2.39°F) above the 20th century average of 12.0°C (53.6°F) (National Oceanic and Atmospheric Administration 2025). Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature (LSAT) obtained from station observations jointly indicate that LSAT and sea surface temperatures have increased.

According to *California's Fourth Climate Change Assessment*, statewide temperatures from 1986 to 2016 were approximately 0.6 to 1.1°C higher than those recorded from 1901 to 1960. Potential impacts of climate change in California may include reduced water supply from snowpack, sea level rise, more extreme heat days per year, more large wildfires, and more drought years (State of California 2018). In addition to statewide projections, *California's Fourth Climate Change Assessment* includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the State and regionally specific climate change case studies (State of California 2018). However, while there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what

local impacts may occur with a similar degree of accuracy. A summary follows of some of the potential effects that could be experienced in California as a result of climate change.

Air Quality and Wildfires

Scientists project that the annual average maximum daily temperatures in California could rise by 2.4 to 3.2°C in the next 50 years and by 3.1 to 4.9°C in the next century (State of California 2018). Higher temperatures are conducive to air pollution formation, and rising temperatures could therefore result in worsened air quality in California. As a result, climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. In addition, as temperatures have increased in recent years, the area burned by wildfires throughout the State has increased, and wildfires have occurred at higher elevations in the Sierra Nevada Mountains (State of California 2018). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality could worsen. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the State. However, if higher temperatures are accompanied by possible wetter, rather than drier conditions, the rains could tend to temporarily clear the air of particulate pollution, which would effectively reduce the number of large wildfires and thereby ameliorate the pollution associated with them (California Natural Resources Agency 2009).

Water Supply

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the West, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. Year-to-year variability in statewide precipitation levels has increased since 1980, meaning that wet and dry precipitation extremes have become more common (California Department of Water Resources 2018). This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand are not well understood. The average early spring snowpack in the western U.S., including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 0.15 meter along the central and southern California coasts (State of California 2018). The Sierra snowpack provides the majority of California's water supply as snow that accumulates during wet winters is released slowly during the dry months of spring and summer. A warmer climate is predicted to reduce the fraction of precipitation that falls as snow and the amount of snowfall at lower elevations, thereby reducing the total snowpack (State of California 2018). Projections indicate that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050 (State of California 2018).

Hydrology and Sea Level Rise

Climate change could affect the intensity and frequency of storms and flooding (State of California 2018). Furthermore, climate change could induce substantial sea level rise in the coming century. Rising sea level increases the likelihood of and risk from flooding and erosion of coastal areas. The rate of increase of global mean sea levels between 1993 to 2020, observed by satellites, is approximately 3.3 millimeters per year, double the twentieth century trend of 1.6 millimeters per

year (World Meteorological Organization 2022; National Aeronautics and Space Administration 2020). Global mean sea levels in 2013 were about 0.23 meter higher than those of 1880 (National Aeronautics and Space Administration 2020). Sea levels are rising faster now than in the previous two millennia, and the rise will probably accelerate, even with robust GHG emission control measures. The most recent IPCC report predicts a mean sea level rise ranging between 0.25 to 1.01 meters by 2100 with the sea level ranges dependent on a low, intermediate, or high GHG emissions scenario (IPCC 2021). A rise in sea levels could erode 31 to 67 percent of southern California beaches and cause flooding of approximately 370 miles of coastal highways during 100-year storm events. This would also jeopardize California's water supply due to saltwater intrusion and induce groundwater flooding and/or exposure of buried infrastructure (State of California 2018). Furthermore, increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

California has an over $50 billion annual agricultural industry that produces over a third of the country's vegetables and two-thirds of the country's fruits and nuts (California Department of Food and Agriculture 2020). Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks (State of California 2018). Temperature increases could also change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (California Climate Change Center 2006).

Ecosystems

Climate change and the potential resultant changes in weather patterns could have ecological effects on the global and local scales, including habitat for plants, animals, and people. Soil moisture is likely to decline in many regions as a result of higher temperatures, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals: timing of ecological events; geographic distribution and range of species; species composition and the incidence of nonnative species within communities; and ecosystem processes, such as carbon cycling and storage (Parmesan 2006; State of California 2018).

4.6.2 Regulatory Setting

a. Federal Regulations

Federal GHG Emissions Regulation

The U.S. Supreme Court in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 497) held that the U.S. EPA has the authority to regulate motor-vehicle GHG emissions under the federal Clean Air Act. The U.S. EPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines, and requires annual reporting of emissions. In 2012, the U.S. EPA issued a Final Rule that establishes the GHG permitting thresholds that determine when Clean Air Act permits under the New Source

Review Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities.

In 2014, the U.S. Supreme Court in Utility Air Regulatory Group v. EPA (134 S. Ct. 2427 [2014]) held that U.S. EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V permit. The Court also held that PSD permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of best available control technology.

b. State Regulations

California's Advanced Clean Cars program (Assembly Bill 1493)

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as Pavley), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, U.S. EPA granted the waiver of Clean Air Act preemption to California for its GHG emission standards for motor vehicles beginning with the 2009 model year. Pavley I regulates model years from 2009 to 2016 and Pavley II, which is now referred to as "Low Emission Vehicle III GHG", regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the Low Emission Vehicle, Zero Emissions Vehicles, and Clean Fuels Outlet programs, and would provide major reductions in GHG emissions. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions compared to their model year 2016 levels (CARB 2011).

Assembly Bill 32 (Global Warming Solutions Act and Scoping Plan)

California's major initiative for reducing GHG emissions is outlined in Assembly Bill (AB) 32, the "California Global Warming Solutions Act of 2006," which was signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 Statewide GHG level and 2020 limit of 427 million $MTCO_2e$. The Scoping Plan was approved by CARB on December 11, 2008 and included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

In May 2014, CARB approved the first update to the AB 32 Scoping Plan. The 2013 Scoping Plan Update defined CARB's climate change priorities for the next five years and set the groundwork to reach post-2020 Statewide goals. The 2013 Scoping Plan Update highlighted California's progress toward meeting the 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the State's longer-term GHG reduction strategies with other State policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use. The State of California achieved its 2020 GHG emission reduction targets in 2016, and emissions have subsequently fallen further in 2018 to 425 $MMTCO_2e$.

Senate Bill 32 (Global Warming Solutions Act and Scoping Plan Extension)

Senate Bill (SB) 32 signed into law on September 8, 2016, tightens the requirements of AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies, such as SB 350 and SB 1383. The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, it recommends that local governments adopt policies consistent with statewide per capita goals of 6 $MTCO_2e$ by 2030 and 2 $MTCO_2e$ by 2050. As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level).

AB 1279 (California Climate Crisis Act and Scoping Plan Extension)

The California Climate Crisis Act (AB 1279), signed into law on September 16, 2022, requires the State to achieve and maintain net zero GHG emissions as soon as possible, but not later than 2045. The Climate Crisis Act also requires the State to reduce Statewide anthropogenic GHG emissions to 85 percent below the 1990 levels by 2045. Updates to the Scoping Plan are required to identify and recommend measures to achieve these goals and identify and implement policies and strategies that enable carbon dioxide removal solutions and carbon capture, utilization, and storage technologies in the State.

On November 16, 2022, CARB also adopted the 2022 Scoping Plan, which provides a framework for achieving targets for carbon neutrality and reducing anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The 2022 Scoping Plan relies on significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

Renewables Portfolio Standard Program (Senate Bill 100)

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Senate Bill 97 and CEQA Guidelines Update

SB 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in CEQA documents. In March 2010, the California Natural Resources Agency adopted amendments to the *CEQA Guidelines* for the feasible mitigation of GHG emissions and analysis of the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHG and climate change impacts.

Senate Bill 375

SB 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 directs each of the State's 18 major Metropolitan Planning Organizations to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan. On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. The Association of Bay Area Governments (ABAG) was assigned targets of a 10 percent reduction in GHGs from transportation sources by 2020 and a 19 percent reduction in GHGs from transportation sources by 2035. In the ABAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

PRC Division 30 Part 3 Chapter 13.1 and Health and Safety Code Sections 39730.5-8 (Senate Bill 1383)

Adopted in September 2016, SB 1383 requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. The bill requires the strategy to achieve the following reduction targets by 2030:

1. Methane – 40 percent below 2013 levels
2. Hydrofluorocarbons – 40 percent below 2013 levels
3. Anthropogenic black carbon – 50 percent below 2013 levels

The bill also requires the California Department of Resources Recycling and Recovery (CalRecycle), in consultation with CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

Executive Order B-55-18

On September 10, 2018, Governor Brown issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

California Code of Regulations Title 24 (California Building Code)

The California Code of Regulations (CCR) Title 24 is referred to as the California Building Code (CBC). It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The current iteration is the 2025 Title 24 standards. The CBC's energy-efficiency and green building standards are outlined as follows.

Part 6 – Building Energy Efficiency Standards (California Energy Code)

CCR Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. The code includes mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also includes both a prescriptive option, allowing builders to

comply by using methods known to be efficient, and a performance option, allowing builders complete freedom in their designs provided the building achieves the same overall efficiency as an equivalent building using the prescriptive option. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC). The 2025 Title 24 standards became effective on January 1, 2026.

Part 11 – California Green Building Standards

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code). The voluntary standards contained in the 2025 CALGreen are changes to model code language that serve as recommendations, examples, and templates for local jurisdictions to use in considering above-code ordinances (also known as "reach codes") and apply to newly constructed buildings and additions or alterations to existing buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

Assembly Bill 341/Assembly Bill 1826 (Mandatory Recycling/Composting)

The California Integrated Waste Management Act of 1989, as modified by AB 341, requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows diversion away from landfills of 75 percent of all solid waste by 2020 and annually thereafter. AB 1826 requires recycling of organic waste (i.e., composting). All businesses and public entities that generate four or more cubic yards of solid waste per week and multi-family residential dwellings that have five or more units are required to recycle and compost.

Senate Bill 1383

In September 2016, Governor Brown signed Senate Bill 1383 into law. SB 1383 establishes methane reduction targets as part of a larger strategy to combat climate change and reduce greenhouse gas emissions. The law establishes a mandated target to achieve a 75 percent reduction in statewide disposal of organic waste by 2025 and requires the state to increase edible food recovery by 20 percent for human consumption by 2025. To achieve these targets, the California Department of Resources, Recycling, and Recovery (CalRecycle) developed a series of rules for all cities and counties throughout California to implement. The regulations were finalized by CalRecycle in November 2020 and take effect on January 1, 2022.

Assembly Bill 1493 (Reduce GHG Emissions from Vehicle Use)

AB 1493 (Chapter 200, Statutes of 2002), known as the first Pavley Bill, amended Health and Safety Code Sections 42823 and added 43018.5 requiring CARB to develop and adopt regulations that achieve maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, light-duty trucks, and other vehicles used for noncommercial personal transportation in California.

Assembly Bill 1007 (State Alternative Fuels Plan)

AB 1007 (Chapter 371, Statutes of 2005) required the CEC to prepare a State plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other federal, State, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative non-

petroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-State production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-State production of biofuels without causing a significant degradation of public health and environmental quality.

CARB In-Use On-Road and Off-Road Diesel Rules

The CARB rule imposes limits on idling, restricts the addition of older vehicles, and requires the retirement or replacement of older engines depending on their fleet size category. This policy indirectly impacts energy consumption. More specifically, CARB is also charged with developing air pollution control regulations based upon the best available control measures and implementing feasible control measures under the State and Federal Clean Air Act. (Health & Saf. Code, §§ 39602.5, 39667, 43013, subds. (a) and (h), 43018, 40600, 40601, 40612(a)(2) and (c)(1)(A).) Pursuant to these statutory authorities, more stringent emission standards were adopted in 2004 for off-road construction equipment (i.e., "Tier 4" standards) (40 Code of Federal Regulations Parts 1039, 1065, and 1068; Cal. Code Regs., tit. 13, § 2025; AR 2854). CARB also adopted emission standards for on-road heavy duty diesel vehicles (i.e. haul trucks). (Cal. Code Regs., tit. 13, § 1956.8.) These haul truck regulations mandate fleet turn-over to ensure that by January 1, 2023 nearly all on-road diesel trucks will have 2010 model year engines or equivalent [i.e. Tier 4]. In addition, interim steps are incorporated into the regulations (e.g., vehicles older than 1999 were replaced with newer engines by 2020).

California Advance Clean Trucks Program

In June 2020, CARB approved the Advanced Clean Trucks regulation, which requires manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. In addition, the regulation requires company and fleet reporting for large employers and fleet owners with 50 or more trucks. By 2045, all new trucks sold in California must be zero-emission. Implementation of this regulation would reduce consumption of nonrenewable transportation fuels as trucks transition to alternative fuel sources.

Executive Order B-48-18 (Zero-Emission Vehicles)

On January 26, 2018, Governor Brown signed Executive Order B-48-18 requiring all State entities to work with the private sector to have at least 5 million zero-emission vehicles (ZEVs) on the road by 2030, as well as install 200 hydrogen fueling stations and 250,000 electric vehicle (EV) charging stations by 2025. It specifies that 10,000 of the EV charging stations should be direct current fast chargers. This order also requires all State entities to continue to partner with local and regional governments to streamline the installation of ZEV infrastructure. The Governor's Office of Business and Economic Development is required to publish a Plug-in Charging Station Design Guidebook and update the 2015 Hydrogen Station Permitting Guidebook to aid in these efforts. All State entities are required to participate in updating the 2016 Zero-Emissions Vehicle Action Plan, along with the 2018 ZEV Action Plan Priorities Update, which includes and extends the 2016 ZEV Action Plan (Governor's Interagency Working Group on Zero-Emission Vehicles 2016, 2018), to help expand private investment in ZEV infrastructure with a focus on serving low-income and disadvantaged communities.

Executive Order N-79-20 (Zero Emissions Vehicles Sales)

Governor Gavin Newsom signed Executive Order N-79-20 in September 2020, which sets a statewide goal that 100 percent of all new passenger car and truck sales in the State will be zero-emissions by 2035. It also sets a goal that 100 percent of statewide new sales of medium- and heavy-duty vehicles will be zero emissions by 2045, where feasible, and for all new sales of trucks to be zero emissions by 2035. Additionally, the Executive Order targets 100 percent of new off-road vehicle sales in the State to be zero emission by 2035. CARB is responsible for implementing the new vehicle sales regulation.

Senate Bill 1020

Senate Bill 1020 (SB 1020), signed into law on September 16, 2022, requires renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035, 95 percent by 2040, and 100 percent by 2045. All State agencies facilities must be served by 100 percent renewable and zero-carbon resources by 2030. SB 1020 also requires the Public Utilities Commission, Energy Commission, and CARB to issue a joint progress report outlining the reliability of the electrical grid with a focus on summer reliability, as well as challenges and gaps. Additionally, SB 1020 requires the Public Utilities Commission to define energy affordability and use energy affordability metrics to develop protections, incentives, discounts, or new programs for residential customers facing hardships due to energy or gas bills.

CARB Gas Appliances Sales Ban

As part of the 2022 State Implementation Plan, CARB adopted a ban on new sales of natural gas heaters, water heaters, and furnaces by 2030 in September of 2022. This new measure is intended to reduce emissions from new residential and commercial space and water heaters sold in the State. An emission standard for space and water heaters will go into effect in 2030. Beginning in 2030, 100 percent of the sales of new natural gas-powered heaters and water heaters would need to comply with the emission standard, such as putting in electric heaters or other zero-emission options.

c. Regional and Local Regulations

Bay Area Air District

In 2013, the Bay Area Air Quality Management District (BAAQMD) adopted resolution no. 2013-11, "Resolution Adopting a Greenhouse Gas Reduction Goal and Commitment to Develop a Regional Climate Protection Strategy" that builds on State and regional climate protection efforts by (BAAQMD 2013):

1. Setting a goal for the Bay Area region to reduce GHG emissions by 2050 to 80 percent below 1990 levels.
2. Developing a Regional Climate Protection Strategy to make progress towards the 2050 goal, using BAAQMD's Clean Air Plan to initiate the process.
3. Developing a 10-point work program to guide the BAAQMD's climate protection activities in the near-term.

BAAQMD is currently developing the Regional Climate Protection Strategy and has outlined the 10-point work program, which includes policy approaches, assistance to local governments, and technical programs that will help the region make progress toward the 2050 GHG emissions goal.

BAAQMD is responsible for enforcing standards and regulating stationary sources in its jurisdiction, including the San Francisco Bay Area Air Basins and the City of Mountain View. BAAQMD regulates GHG emissions through specific rules and regulations, as well as project and plan level emissions thresholds for GHGs to ensure that new land use development in the San Francisco Bay Area Air Basin contributes to its fair share of emissions reductions (BAAQMD 2017).

Plan Bay Area 2050

Plan Bay Area 2050 is a state-mandated, integrated long-range transportation, land-use, and housing plan (sustainable communities strategy or SCS) that would support a growing economy, provide more housing and transportation choices, and reduce transportation-related pollution in the nine-county San Francisco Bay Area (MTC/ABAG 2021). The SCS builds on earlier efforts to develop an efficient transportation network and grow in a financially and environmentally responsible way. Plan Bay Area 2050 focuses on advancing equity and improving resiliency in the Bay Area by creating strategies in the following four elements: Housing, Economy, Transportation, and Environment. The Plan discusses how the future of the region is uncertain due to anticipated employment growth, lack of housing options, and outside forces, such as climate change and economic turbulence. These uncertainties will impact growth in the Bay Area and exacerbate issues for all residents including those who are historically and systemically marginalized, underserved, and excluded. Thus, Plan Bay Area 2050 has created strategies and considered investments that will serve those systemically underserved communities and provide equitable opportunities. The Plan presents a total of 35 strategies to outline how the $1.4 trillion dollar investment would be utilized. The strategies include, but are not limited to, the following: providing affordable housing, allowing higher-density in proximity to transit-corridors, optimizing the existing roadway network, creating complete streets, providing subsides for public transit, reducing climate emissions, and expanding open space area. To bring these strategies to fruition, Plan Bay Area 2050 will require participation by agencies, policymakers, and the public. An implementation plan is also included as part of the Plan to assess the requirements needed to carry out the strategies, identify the roles of pertinent entities, create an appropriate method to implement the strategies, and create a timeline for implementation (ABAG/MTC 2021).

City of Mountain View 2030 General Plan

The Mountain View 2030 General Plan is the guiding document for the City's physical development and preservation. It includes goals, policies and graphics that convey a long-term vision and guide local decision-making to achieve that vision. The Land Use and Design Element and Infrastructure and Conservation Element of the General Plan include the following policies related to climate change (City of Mountain View 2012a).

Goal LUD-3: A diverse, balanced and flexible mix of land uses that supports a strong economy, complete neighborhoods, transit use and community health.

> **LUD 3.1: Land use and transportation.** Focus higher land use intensities and densities within a half-mile of public transit service, and along major commute corridors.
>
> **LUD 3.2: Mix of land uses.** Encourage a mix of land uses, housing types, retail and public amenities and public neighborhood open spaces accessible to the community.

LUD 3.6: Access to healthy food choices. Ensure all neighborhoods have access to healthy food choices at grocery stores within walking or bicycling distance.

Goal INC-5: Effective and comprehensive programs utilizing water use efficiency, water conservation and alternative water supplies to reduce per capita potable water use.

Policy INC-5.2: Citywide water conservation. Reduce water waste and implement water conservation and efficiency measures throughout the city.

Policy INC-5.4: Smart water meters. Encourage water meter technologies that provide water usage feedback to customers.

Policy INC-5.5: Landscape efficiency. Promote water-efficient landscaping including drought-tolerant and native plants, along with efficient irrigation techniques.

Policy INC-5.6: Indoor efficiency. Promote the use of water-efficient fixtures and appliances.

Goal INC-7: A reliable, safe and extensive recycled water infrastructure system.

Policy INC-7.1: Citywide recycled water use. Promote, require or offer incentives for using recycled water as an alternative to potable water.

Policy INC-7.2: Recycled water system. Expand the use and availability of recycled water throughout the city

Goal INC-11: Services and programs that continue to reduce waste and promote environmental responsibility.

Policy INC-11.1: Waste diversion and reduction. Meet or exceed all federal, state and local laws and regulations concerning solid waste diversion and implementation of recycling and source reduction programs.

Policy INC-11.2: Recycling. Maintain and expand recycling programs.

Policy INC-11.3: Composting. Provide productive reuse or composting services or both for all discarded organic materials in the city, including all food and green waste.

Policy INC-11.4: Solid waste. Ensure all municipal solid waste generated within the city is collected, transported and disposed of in a manner that protects public health and safety.

Goal INC-12: Environmental stewardship that recognizes the importance of addressing climate change and community commitment to sustainability.

Policy INC-12.1: Emissions reduction target. Maintain a greenhouse gas emissions reduction target.

Policy INC-12.2: Emissions reduction strategies. Develop cost-effective strategies for reducing greenhouse gas emissions.

Policy INC-12.3: Adaptation strategies. Develop strategies for adapting to climate change in partnership with local and regional agencies.

Goal INC-14: Sufficient renewable sources of energy to meet current and future demand.

Policy INC-14.1: Renewable energy. Promote the deployment of renewable energy technologies throughout the city

Policy INC-14.2: Solar energy. Encourage active and passive solar energy use.

Policy INC-14.3: Regional renewable energy. Participate in regional initiatives to encourage and develop renewable energy sources.

Policy INC-14.4: Renewable energy advocacy. Support legislation to facilitate and increase renewable energy choices for community residents such as green utility power options or distributed generation.

City of Mountain View Greenhouse Gas Reduction Program

In 2012, the City adopted a Greenhouse Gas Reduction Plan (GGRP; City of Mountain View 2012b) to implement the 2030 General Plan policies relating to climate change and mitigate GHG emissions associated with development allowed in the 2030 Mountain View General Plan. At the time, BAAQMD guidelines required qualified GHG reduction plans to contain a target for 2020 and provide substantial evidence that the plan's reduction actions would achieve the selected target. The BAAQMD guidelines allowed cities to use either an absolute or an efficiency-based target. During development of the GGRP, it became evident that it would be difficult to achieve the adopted community-wide 2020 emission reduction target and the City chose to use a BAAQMD-approved emissions efficiency target (i.e., a per-capita target) within the GGRP that would result in a community emissions efficiency of below 6.0 metric tons of carbon dioxide equivalent per service population. While the GGRP defines actions that will improve community GHG efficiency in 2020 and 2030, it does not contain actions strong enough to achieve the City's adopted absolute targets.

Climate Protection Roadmap

To address the inconsistency of the efficiency targets used within the GGRP with its previously adopted absolute targets, the City initiated the Climate Protection Roadmap (CPR; City of Mountain View 2015) project to evaluate the feasibility of achieving the adopted targets.

Community-wide GHG emissions in Mountain View are anticipated to increase to 68 percent above 2005 levels by 2050. The CPR evaluates mechanisms through which the community could achieve the emission reduction target to reduce community emissions 80 percent below 2005 levels by 2050 and identifies various roles the City might play in facilitating such reductions. The CPR evaluates a variety of technological, behavioral, and/or other system transitions that could reduce emissions within the community and identifies the most important transitions and actions (referred to as implementation mechanisms) within the City's authority that could contribute to these transitions. The CPR is not a plan in and of itself, but an analysis that may be used by City officials to evaluate the potential for long-term communitywide emission reduction initiatives moving forward. Due to the high-level nature of the analysis, the CPR does not explicitly direct implementation of any specific city actions. However, it outlines viable options for future city programs, policies, and actions that could be pursued following additional feasibility analysis. Moving toward achieving the community emission reduction targets, the CPR identifies interim community emission reduction targets for every five-year period between 2020 and 2050 to help keep the City on track to achieve its long-term 2050 reduction target.

On December 3, 2019, the City Council approved a proposal to change the existing community emission reduction targets, which declined along a relatively linear path, to decline based on a constant annual percentage. This change was consistent with the recommendations in the Special Report released by the IPCC in late 2018, which emphasized the necessity of significant, near-term

reductions by 2030 to avoid catastrophic climate change impacts. Following are the current community emission reduction targets:

- 33 percent below 2005 baseline levels by 2025
- 47 percent below 2005 baseline levels by 2030
- 59 percent below 2005 baseline levels by 2035
- 68 percent below 2005 baseline levels by 2040
- 75 percent below 2005 baseline levels by 2045

Carbon Neutrality Resolution

In April 2020, the City Council passed a resolution for Mountain View to become a carbon neutral city by 2045. This means that in addition to achieving the adopted 2045 GHG reduction target of 75 percent below 2005 levels, Mountain View has committed to balancing any remaining GHG emissions with carbon sequestration projects (such as planting trees or restoring wetlands) and/or carbon offsets.

City of Mountain View Reach Codes

The Mountain View City Council's Green Building Code amendments include Reach Codes efforts. These included electrification, solar readiness of buildings, provision of EV charging infrastructure, and energy efficiency for all new construction projects. The Reach Codes established higher standards for new construction to provide environmental and health benefits to the community. The Mountain View Reach Codes focused on new residential, commercial, and multifamily buildings seeking building permits after December 9, 2020.

In September 2025, the City of Mountain View passed Ordinance 9.2025, which includes updates to the City's Green Building Code Amendments. In addition to reinforcing the mandatory adherence to the California Green Building Code and local amendments, Table 101.10 of Ordinance 9.2025 requires new multifamily residential construction to install the maximum amount of photovoltaic solar per California Energy Code Section 170.2(f) or 170.2(g), depending on the number of building stories, and install a battery energy storage system per California Energy Code Section 170.2(h) for buildings exceeding three stories.

City of Mountain View Standard Conditions of Approval

As part of discretionary review, the City has standard conditions for different types of approvals (updated as of October 25, 2021). The City has standard conditions relating to GHG emissions, as summarized below.

Green Building – Residential New Construction

The Project is required to meet the mandatory measures of the California Green Building Standards Code and meet the intent of the applicable GreenPoint Rated points. All mandatory prerequisite points and minimum point totals per category to attain GreenPoint Rated status must be achieved, unless specific point substitutions or exceptions are approved by the Community Development Department. Formal project registration and certification through Build It Green is not required for compliance with the Mountain View Green Building Code (MVGBC). The Project is also required to comply with Title 24, Part 6.

4.6.3 Impact Analysis

Methodology and Thresholds of Significance

Methodology

The R3 Zoning District Update would allow for the development of approximately 16,000 housing units that would be proposed and constructed gradually over time through 2050. Given that the Project is programmatic in nature and does not propose any specific development at this time, the timing, intensity, and nature of construction activities are unknown. Therefore, there is not sufficient detail for a project-level analysis of construction-related GHG emissions as such an analysis would be speculative. Furthermore, because construction emissions are temporary and variable, the Air District has not developed a quantitative threshold of significance for construction-related GHG emissions.

Operational GHG emissions for development facilitated by the Project were quantified for informational purposes only using CalEEMod Version 2022.1. The model calculates emissions of the following GHGs: CO_2, N_2O, and CH_4, which are combined using each GHGs' GWP and reported as CO_2e. GHG emissions include mobile sources, area sources, energy sources, solid waste sources, water sources, and refrigerant sources. CalEEMod defaults were used for the inputs. CalEEMod output files are included in Appendix F.

Significance Thresholds

To determine whether a project would result in a significant impact related to GHG emissions, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

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

The construction of individual development projects does not generate enough GHG emissions to create significant project-specific environmental effects. However, the environmental effects of a project's GHG emissions can contribute incrementally to cumulative adverse environmental effects that are significant, contributing to climate change, even if an individual project's environmental effects are limited (*CEQA Guidelines* Section 15064[h][1]). The issue of a project's environmental effects and contribution towards climate change typically involves an analysis of whether a project's contribution towards climate change is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (*CEQA Guidelines* Section 15064[h][1]).

CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions. CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for

their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (see *CEQA Guidelines* Section 15064.7[c]).

According to the *CEQA Guidelines*, projects can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals (AEP) in their white paper, *Beyond Newhall and 2020*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions (AEP 2016). Although the City's CPR identifies pathways to achieve State targets, it is not a plan in and of itself, and does not constitute a CAP. Therefore, the City does not have a qualified CAP from which projects can tier.

BAAQMD recently adopted updated thresholds for evaluating the significance of climate impacts from development projects (BAAQMD 2023). The new project-level thresholds state that development projects must either include the following project design elements, or be consistent with a local GHG reduction strategy that meets the criteria under *CEQA Guidelines* Section 15183.5(b):

1. **Buildings**
    a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
    b. The project will not result in any wasteful, inefficient, or unnecessary energy use as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

2. **Transportation**
    a. The project will achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target that reflects the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory: *Evaluating Transportation Impacts in CEQA*:
        i. Residential projects: 15 percent below the existing VMT per capita
        ii. Office projects: 15 percent below the existing VMT per employee
        iii. Retail projects: no net increase in existing VMT
    b. The project will achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

The analysis below is based on the Project's consistency with BAAQMD's building and transportation design elements thresholds. Project impacts would be less than significant if development facilitated by the Proposed Project includes all of the Project design elements listed above. However, as explained further below, the City cannot guarantee that all of the Project design elements listed above will be implemented for every site-specific project.

Project Impacts and Mitigation

This analysis focuses on impacts associated with implementation of the proposed program which could facilitate the development of up to 16,000 dwelling units on parcels located throughout the city as shown in Figure 2-6 in Chapter 2, *Project Description*.

Threshold 1:	Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact GHG-1 THE PROPOSED PROJECT WOULD NOT BE CONSISTENT WITH BAAQMD'S BUILDING AND TRANSPORTATION THRESHOLDS. MITIGATION MEASURES ARE INFEASIBLE; THEREFORE, THIS IMPACT WOULD REMAIN SIGNIFICANT AND UNAVOIDABLE.

As discussed above under Significance Thresholds, since the City of Mountain View does not have a qualified CAP that meets the criteria under *CEQA Guidelines* Section 15183.5(b), this analysis is based on Project consistency with BAAQMD's building and transportation design elements threshold.

Although the Proposed Project would be required to comply with the most recent iteration of the California Energy Code, future development may include installation of natural gas appliances. Further, the ability to regulate all electric development has been affected by the recent Ninth Circuit decision in *California Restaurant Association v. City of Berkeley*, which found that cities cannot ban natural gas appliances. Although individual projects may incorporate all electric development as a project design feature, the City of Mountain View does not have the regulatory authority to mandate all electric construction as a regulation, condition of approval, or mitigation measure. As a result, the Proposed Project would be inconsistent with threshold 1.a.

As discussed in the energy analysis in Section 4.16, *Effects Found Not to be Significant*, the Proposed Project would be subject to Title 24 and CALGreen energy conservation requirements adopted pursuant to Mountain View City Code Section 8.10.1, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources by the built environment during operation. Therefore, the Proposed Project would be consistent with threshold 1.b. of the project-level BAAQMD thresholds.

Furthermore, as discussed under Section 4.13, *Transportation*, the Project would increase allowable residential densities in areas proximate to existing commercial and office areas. According to the California Air Pollution Control Officers Association 2021 *Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity,* increases in development density reduces VMT generation in the area (Appendix C). Based on the increased allowable densities proposed as part of the Project, it is anticipated the Project could facilitate a citywide VMT reduction of approximately 30 percent (Appendix C). Accordingly, the Project is not anticipated to result in VMT generation that exceeds the City's threshold of 15 percent below the existing VMT rate for Mountain View. Therefore, the Project would not conflict or be inconsistent with threshold 2.a.

Additionally, although the City currently requires new construction to comply with mandatory standards set forth by CALGreen Chapter 4, Division 4.1 pursuant to Section 8.20.9 of the Mountain View City Code, which requires new project sites with three or more multi-family dwelling units to meet mandatory CALGreen requirements for EV charging spaces, these requirements are less stringent than CALGreen Tier 2 voluntary standards. The City also has not established additional EV requirements for multi-family development. As a result, the Proposed Project would be inconsistent with threshold 2.b of the project-level BAAQMD thresholds.

Based on the City's current regulations and the findings of the VMT analysis, the Proposed Project would be consistent with threshold 1.b related to the wasteful, inefficient, or unnecessary consumption of energy, and threshold 2.a related to reductions in per capita VMT. However, the Project would not be consistent with the BAAQMD's building and transportation design elements

thresholds 1.a related to natural gas usage and 2.b related to CALGreen Tier 2 EV parking requirements.

GHG Emissions

Total GHG emissions for the Proposed Project are provided below for informational purposes. Operation of the Proposed Project would generate GHG emissions associated with area sources, energy and water usage, vehicle trips, wastewater and solid waste generation, and refrigerants. Table 4.6-1 shows the estimated operational GHG emissions associated with full buildout of 16,000 units for future development under the Proposed Project. As shown therein, annual emissions from the Proposed Project would be approximately 122,721 MT of CO_2e per year.

Table 4.6-1 Operational GHG Emissions

Emission Source	Annual Emissions (MT of CO_2e)
Operational	
Mobile	86,801
Area	1,018
Energy	31,270
Water	1,141
Waste	2,471
Refrigerants	20
Operational Total	**122,721**

Source: Appendix F

Mitigation Measures

Pursuant to case law, *California Restaurant Association v. City of Berkeley*, the 9th Circuit Appellate Court found that a city cannot ban natural gas because they are preempted from doing so by federal law under the Energy Policy and Conservation Act. Thus, the City of Mountain View cannot mandate that the Proposed Project is modified to adhere to Air District's GHG threshold 1.a of prohibiting natural gas appliances or natural gas plumbing because the City would be preempted from enforcing such mitigation. In addition, due to AB 130's moratorium on state or local building standards affecting residential units, the City of Mountain View cannot require compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2 that would satisfy BAAQMD's GHG threshold 2.b. Therefore, no feasible mitigation exists to reduce the project's potentially significant GHG impacts.

Significance After Mitigation

Because there is no feasible mitigation to reduce potentially significant impacts resulting from GHG emissions of the project, and this impact would be significant and unavoidable.

Threshold 2:	Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-2 THE PROPOSED PROJECT WOULD NOT CONFLICT WITH PLAN BAY AREA 2050 OR THE MOUNTAIN VIEW GENERAL PLAN. HOWEVER, THE PROPOSED PROJECT WOULD POTENTIALLY CONFLICT WITH THE 2022 SCOPING PLAN. MITIGATION MEASURES ARE INFEASIBLE; THEREFORE, THIS IMPACT WOULD REMAIN SIGNIFICANT AND UNAVOIDABLE.

The Proposed Project was evaluated for consistency with applicable State and local plans that were developed with the intent of reducing GHG emissions. Each applicable plan is discussed separately below.

2022 Scoping Plan

The principal State plans and policies for reducing GHG emissions are AB 32, SB 32, SB 375, and AB 1279. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020; the goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030; the goal of SB 375 is to link transportation planning and land use planning; and the goal of AB 1279 is to achieve net zero greenhouse gas emissions no later than 2045, (reduce GHG emissions by 85 percent below 1990 levels no later than 2045). The 2022 Scoping Plan expands upon earlier plans to include the AB 1279 targets. The 2022 Scoping Plan's strategies that are applicable to the proposed R3 Zoning District Update include reducing fossil fuel use and VMT; decarbonizing the electricity sector, maximizing recycling and diversion from landfills; and increasing water conservation. The Proposed Project would be consistent with these goals since future development would be required to comply with the latest Title 24 Green Building Code and Building Efficiency Energy Standards, as well as the AB 341 waste diversion goal of 75 percent and recycle organic wastes pursuant to SB 1383. The proposed zoning changes would enable higher-density housing on sites located near major transit routes, employment centers, and amenities, thereby reducing trip lengths and energy consumption associated with transportation.

Pursuant to City of Mountain View Ordinance 9.2025, multifamily residential development would be required to install the maximum amount of photovoltaic solar per California Energy Code Section 170.2(f) or 170.2(g), depending on the number of building stores, and install a battery energy storage system per California Energy Code Section 170.2(h) for multifamily residences exceeding three stories. Additionally, the Proposed Project would receive electricity from Silicon Valley Clean Energy's (SVCE) GreenStart 50 percent renewable power program, and future customers would also have the option to opt in for up to 100 percent renewable power. Nonetheless, as discussed under Impact GHG-1, future development may include installation of natural gas appliances. The 2022 Scoping Plan identifies building electrification as a strategy to achieve carbon neutrality by 2045, including targets for all-electric appliances in new residential buildings beginning in 2026. Although the 2022 Scoping Plan does not prohibit natural gas appliances or set project-level mandates, BAAQMD considers the phaseout of natural gas to be an essential design element in determining consistency with State targets set forth by SB 32, AB 1279, and the 2022 Scoping Plan. Therefore, the Project would potentially conflict with the 2022 Scoping Plan.

Plan Bay Area 2050

As shown in Table 4.6-2, the Proposed Project would be consistent with the key goals of Plan Bay Area 2050.

Table 4.6-2 Project Consistency with Plan Bay Area 2050

Measure	Project Consistency
T8. Build a Complete Streets network. Enhance streets to promote walking, biking and other micro-mobility through sidewalk improvements, car-free slow streets, and 10,000 miles of bike lanes or multi-use paths.	**Consistent**: The Proposed Project itself does not include bicycle or pedestrian improvements but also would not include Project components that would conflict with bicycle or pedestrian access or facilities. The Proposed Project facilitates housing development on infill sites and on sites in proximity to corridors served by Class II and Class III bicycle lanes and bus stops, such as East Evelyn Avenue, State Route 82, and West Middlefield Road. The Project would not interfere with the implementation of projects outlined in VTA's 2040 Plan, the Countywide Bicycle Plan, or regional bikeway improvements identified in Plan Bay Area 2050. Allowing for increased residential density in areas with existing bicycle infrastructure would provide access to facilitate bicycle travel for an increased amount of residents compared to existing conditions which could increase bicycling throughout the City, consistent with City General Plan Mobility Element policies MOB 4.1 through MOB 4.5.
EN4. Maintain urban growth boundaries. Using urban growth boundaries and other existing environmental protections, focus new development within the existing urban footprint or areas otherwise suitable for growth, as established by local jurisdictions.	**Consistent.** The Proposed Project does not involve changes to the city limits or otherwise change urban growth boundaries. The Project would focus development within the city's existing urban footprint and facilitate infill development on underutilized sites.
EN8. Expand clean vehicle initiatives. Expand investments in clean vehicles, including more fuel-efficient vehicles and electric vehicle subsidies and chargers.	**Consistent.** The Proposed Project would be required to comply with CALGreen Chapter 4, Division 4.1 which requires new multifamily developments with fewer than 20 dwelling units to designate ten percent of the total number of parking spaces as EV capable, and for new project sites with 20 or more multi-family dwelling units to include five percent of the total number of parking spaces as EV charging spaces.

Source: ABAG 2021

City of Mountain View 2030 General Plan

The Infrastructure and Conservation Element of the Mountain View 2030 General Plan contains goals that would have the effect of reducing GHG emissions. As shown in Table 4.6-3, the Proposed Project would be consistent with these principles and policies.

Table 4.6-3 City of Mountain View General Plan Consistency for GHG Emissions

General Plan 2035 Policy or Action	Consistency
Goal LUD-3: A diverse, balanced and flexible mix of land uses that supports a strong economy, complete neighborhoods, transit use and community health.	
Policy LUD 3.1: Land use and transportation. Focus higher land use intensities and densities within a half-mile of public transit service, and along major commute corridors.	**Consistent**: The Project would increase allowable residential densities in areas served by existing VTA bus, light-rail routes, and Caltrain commuter rail. The allowance of increased residential densities near transit infrastructure and along transit corridors would increase accessibility to transit and transit ridership. Additionally, the Project would increase residential densities in areas with existing bicycle and pedestrian infrastructure, which would facilitate bicycle and pedestrian travel for an increased amount of residents compared to existing conditions.

General Plan 2035 Policy or Action	Consistency
Goal INC-5: Effective and comprehensive programs utilizing water use efficiency, water conservation and alternative water supplies to reduce per capita potable water use.	
Policy INC-5.2: Citywide water conservation. Reduce water waste and implement water conservation and efficiency measures throughout the city. **Policy INC-5.5: Landscape efficiency.** Promote water-efficient landscaping including drought-tolerant and native plants, along with efficient irrigation techniques.	**Consistent.** Development facilitated by the Proposed Project would comply with the latest Title 24 CALGreen and Building Efficiency Energy Standards, which mandate the use of water-efficient fixtures and water-efficient irrigation systems. As mentioned above under the 2022 Scoping Plan, the Project would be consistent with the State's climate goals by incorporating sustainable practices, which include promotion of water-efficient landscaping and efficient irrigation techniques.
Goal INC-11: Services and programs that continue to reduce waste and promote environmental responsibility.	
Policy INC-11.1: Waste diversion and reduction. Meet or exceed all federal, state and local laws and regulations concerning solid waste diversion and implementation of recycling and source reduction programs.	**Consistent.** Development facilitated by the Proposed Project would comply with the AB 341 waste diversion goal of 75 percent in addition to waste diversion measures set forth in the latest Title 24 CALGreen and Building Efficiency Energy Standards and the Mountain View City Code.
Goal INC-12: Environmental stewardship that recognizes the importance of addressing climate change and community commitment to sustainability.	
Policy INC-12.2: Emissions reduction strategies. Develop cost-effective strategies for reducing greenhouse gas emissions.	**Consistent.** Future development facilitated by the Proposed Project would implement strategies outlined within CARB's 2022 Scoping Plan as discussed above under Impact GHG-2 and ABAG's Plan Bay Area 2040 as shown in Table 4.6-2. Therefore, the Project would be consistent with applicable emissions reduction strategies and associated GHG-reducing strategies.
Goal INC-14: Sufficient renewable sources of energy to meet current and future demand.	
Policy INC-14.1: Renewable energy. Promote the deployment of renewable energy technologies throughout the city	**Consistent.** Future development facilitated by the Proposed Project would not be 100 percent electric; however, multifamily residential development would be required to install the maximum amount of rooftop photovoltaic solar described by California Energy Code Section 170.2(f) or 170.2(g), depending on building stories, pursuant to Mountain View Ordinance 9.2025. Therefore, the Project would promote the deployment of renewable energy technologies throughout the city.

Source: City of Mountain View 2012

Summary

As described above, the Project would potentially conflict with the 2022 Scoping Plan because the project would not implement a ban on natural gas appliances. Although the 2022 Scoping Plan does not prohibit natural gas appliances or set project-level mandates, BAAQMD considers the phaseout of natural gas to be an essential design element in determining consistency with State targets set forth by SB 32, AB 1279, and the 2022 Scoping Plan. The Project would be consistent with Plan Bay Area 2050, and the Mountain View General Plan. Nonetheless, this impact would be potentially significant.

Mitigation Measures

Pursuant to case law *California Restaurant Association v. City of Berkeley*, the 9th Circuit Appellate Court found that a city cannot ban natural gas because they are preempted from doing so by federal law under the Energy Policy and Conservation Act. Thus, the City of Mountain View cannot mandate that the Proposed Project adhere to BAAQMD's GHG threshold 1.a of prohibiting natural gas

appliances or natural gas plumbing because the City would be preempted from enforcing such mitigation. In addition, due to AB 130's moratorium on state or local building standards affecting residential units, the City of Mountain View cannot require compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2 that would satisfy BAAQMD's GHG threshold 2.b. Therefore, no feasible mitigation exists to reduce the project's potentially significant GHG impacts.

Significance After Mitigation

Because there is no feasible mitigation to reduce potentially significant impacts resulting from GHG emissions of the project, the Proposed Project would remain inconsistent with the 2022 Scoping Plan, and this impact would be significant and unavoidable.

4.6.4 Cumulative Impacts

IMPACT GHG-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD RESULT IN A CUMULATIVELY SIGNIFICANT CONTRIBUTION TO GLOBAL GREENHOUSE GAS EMISSIONS DUE TO INCONSISTENCY WITH STATE CLIMATE GOALS AND APPLICABLE PROJECT-LEVEL EMISSION THRESHOLDS. CUMULATIVE GREENHOUSE GAS IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE, AND THE CONTRIBUTION OF THE PROJECT WOULD BE CUMULATIVELY CONSIDERABLE.

The impact of GHG emissions generated by the Proposed Project is inherently cumulative. GHG emissions from one project cannot, on their own, result in changes in climatic conditions; therefore, the emissions from any project must be considered in the context of their contribution to cumulative global emissions, which is the basis for determining a significant cumulative impact. This is determined through the Project's consistency with applicable GHG emission thresholds and applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. The Proposed Project would be generally consistent with Plan Bay Area 2050 and the Mountain View General Plan. However, the project would be unable to implement mitigation to prohibit natural gas appliances due to case law and CALGreen Tier 2 EV chargers due to AB 130. Therefore, the Proposed Project would still be inconsistent with the State's 2022 Scoping Plan and BAAQMD's project-level thresholds, specifically building threshold 1.a., as the City's ability to regulate all electric development has been affected by recent caselaw; and transportation threshold 2.b., as the City's EV requirements are less stringent than CALGreen Tier 2. Therefore, the Proposed Project would result in a significant and unavoidable cumulative impact on GHG emissions.

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4.7 Hazards and Hazardous Materials

This section evaluates the potential impacts related to hazards and hazardous materials associated with implementation of the Proposed Project.

4.7.1 Setting

Hazardous Materials

The term "hazardous material" has different definitions for different regulatory programs. For the purpose of this EIR, the term "hazardous materials" refers to both hazardous materials and hazardous waste. The California Health and Safety Code (HSC) Section 25501(n)(1) defines a hazardous material as any material that "because of its quantity, concentrations, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment." Hazardous materials include but are not limited to hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment.

A material is hazardous if it exhibits one or more of the following characteristics: toxicity, ignitability, corrosivity, and reactivity. These types of hazardous materials are defined below:

- **Toxic Substances.** Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability, or even death. For example, such substances can cause disorientation, acute allergic reactions, asphyxiation, skin irritation, or other adverse health effects if human exposure exceeds certain levels (the level depends on the substances involved and is chemical-specific). Carcinogens, substances that can cause cancer, are a special class of toxic substances. Examples of toxic substances include asbestos, lead, arsenic, benzene (a component of gasoline and suspected carcinogen) and methylene chloride (a common laboratory solvent and a suspected carcinogen).
- **Ignitable Substances.** Ignitable substances are hazardous because of their ability to burn. Gasoline, hexane, and natural gas are examples of ignitable substances.
- **Corrosive Materials.** Corrosive materials can cause severe burns. Corrosives include strong acids and bases such as sodium hydroxide (lye) or sulfuric acid (battery acid).
- **Reactive Materials.** Reactive materials may cause explosions or generate toxic gases. Explosives, pure sodium or potassium metals (which react violently with water), and cyanides are examples of reactive materials.

Soil and groundwater can become contaminated by hazardous material releases in a variety of ways, including permitted or illicit use and accidental or intentional disposal or spillage. Before the 1980s, most land disposal of chemicals was unregulated, resulting in numerous industrial properties and public landfills becoming dumping grounds for unwanted chemicals. The largest and most contaminated of these sites became Superfund sites, so named for their eligibility to receive cleanup money from a federal fund established under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The National Priorities List (NPL) is the list of national priorities among the known releases or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and its territories. The NPL is intended primarily to

guide the United States Environmental Protection Agency (U.S. EPA) in determining which sites warrant further investigation. Sites are added to the NPL following a hazard ranking system.

Numerous smaller properties have been designated as contaminated sites. Often these are gas station sites where leaking underground storage tanks (USTs) were upgraded under a federal requirement in the late 1980s. Another category of sites that may have some overlap with the types already mentioned is "brownfields" – previously used, often abandoned, sites that due to actual or suspected contamination are undeveloped or underused. Both the U.S. EPA and California Department of Toxic Substances Control (DTSC) maintain lists of known brownfields sites. These sites are often difficult to inventory due to their owners' reluctance to publicly label their property as potentially contaminated.

Asbestos-Containing Materials

Asbestos is a naturally occurring fibrous material that was widely used in structures built between 1945 and 1978 for its fireproofing and insulating properties. Asbestos-containing materials (ACM) were banned by U.S. EPA between the early 1970s and 1991 under the authority of the CAA and the Toxic Substances Control Act (TSCA) due to their harmful health effects. Exposure to asbestos increases risk of developing lung disease, such as lung cancer, mesothelioma, or asbestosis (USEPA 2024a). Common ACMs include vinyl flooring and associated mastic, wallboard and associate joint compound, plaster, stucco, acoustic ceiling spray, ceiling tiles, heating system components, and roofing materials. Pre-1973 structures are affected by asbestos regulations and can cause potential exposure if damage occurs, or if remodeling, renovation, or demolition activities disturb ACMs.

Lead and Lead-Based Paint

Lead is a naturally occurring metallic element. Because of its toxic properties, lead is regulated as a hazardous material. Excessive exposure to lead can result in the accumulation of lead in the blood, soft tissues, and bones. Children are particularly susceptible to potential lead-related health problems because it is easily absorbed into developing systems and organs. Lead can affect almost every organ and system in the body. In children, lead can cause behavior and learning problems, lower IQ, hyperactivity, hearing problems, and anemia. In adults, lead can cause cardiovascular effects, decreased kidney function, and reproductive problems. In addition, lead can result in serious effects to the developing fetus and infant for pregnant women. Among its numerous uses and sources, lead can be found in paint, water pipes, solder in plumbing systems, and in soils surrounding buildings and structures that are painted with lead-based paint (LBP). LBP was primarily used during the same time period as ACMs. Pre-1978 structures are affected by LBP regulations and can cause potential exposure if the paint is in a deteriorated condition or if remodeling, renovation, or demolition activities disturb LBP surfaces.

Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs) belong to a broad family of man-made organic chemicals known as chlorinated hydrocarbons. PCBs were domestically manufactured from 1929 until manufacturing was banned in 1979. They have a range of toxicity and vary in consistency from thin, light-colored liquids to yellow or black waxy solids. Due to their non-flammability, chemical stability, high boiling point and electrical insulating properties, PCBs were used in hundreds of industrial and commercial applications.

Existing Hazardous Materials Conditions

Hazardous Materials Sites

The locations where hazardous materials are or were used, stored, treated and/or disposed of come to the attention of regulatory agencies through various means, including licensing and permitting, enforcement actions, and anonymous tips. To the extent possible, the locations of these businesses and operations are recorded in database lists maintained by various State, federal, and local regulatory agencies. In addition, federal, State, and local agencies enforce regulations applicable to hazardous waste generators and users and the Santa Clara County Department of Environmental Health tracks and inspects hazardous materials handlers in Santa Clara County to ensure appropriate reporting and compliance.

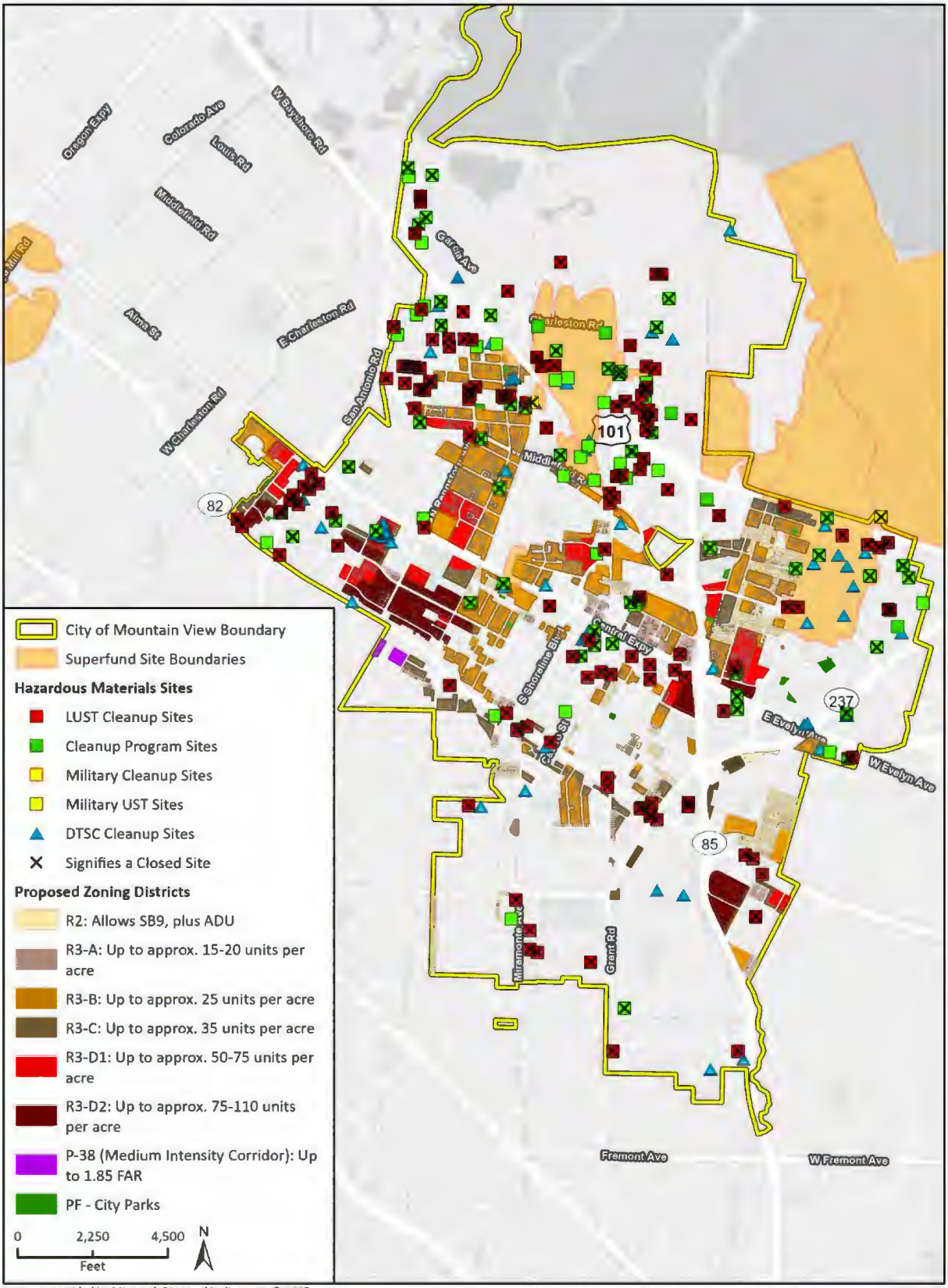
Permitted uses of hazardous materials include those facilities that use hazardous materials or handle hazardous wastes in accordance with current hazardous materials and hazardous waste regulations. The use and handling of hazardous materials from these sites is considered low risk, although there can be instances of unintentional chemical releases. In such cases, the site and the response to the release would be tracked in the environmental databases as an environmental case. Permitted sites without documented releases are, nevertheless, potential sources of hazardous materials in the soil and/or groundwater due to accidental spills, incidental leakage, or spillage that may have gone undetected. Some facilities are permitted for more than one hazardous material use and, therefore, could appear in more than one database.

The potential to encounter hazardous materials in soil and groundwater in Mountain View is generally based on a search of federal, State, and local regulatory databases that identify permitted hazardous materials uses, environmental cases, and spill sites. The DTSC EnviroStor database contains information on properties in California where hazardous substances have been released or where the potential for a future release exists. The California State Water Resources Control Board (SWRCB) GeoTracker database contains information on properties in California for sites that require cleanup, such as leaking underground storage tank (LUST) sites, which may impact, or have potential impacts, to water quality, with emphasis on groundwater.

As discussed in the City of Mountain View 2023 Housing Element Environmental Impact Report, Mountain View contains Superfund sites listed in the U.S. EPA's NPL. The historic industrial production of semiconductors, electronics, and other manufacturing in the Mountain View and Moffett Field Areas resulted in the contamination of soil and groundwater with volatile organic compounds (VOCs), primarily trichloroethane (TCE). The Middlefield-Ellis-Whisman (MEW) Superfund Study Area was named for the streets that bound the source areas of contamination: Middlefield Road, Ellis Street, and Whisman Road. The MEW Superfund Study Area contains three separate Superfund Sites, including the Fairchild Semiconductor Corporation, Raytheon Company, Intel Corporation, and portions of the former Naval Air Station Moffett Field Superfund Property.

According to databases of hazardous material sites maintained by the DTSC (EnviroStor) and the SWRCB (GeoTracker), there are a total of 282 hazardous material sites within the City of Mountain view, 243 of which are "Completed-Case Closed," or sites that have completed remedial or cleanup actions and a formal closure decision document has been issued for the site (DTSC 2025, SWRCB 2025). All hazardous materials sites and Superfund Site boundaries are shown in Figure 4.7-1, below. Within the project area, there are 25 identified open or active hazardous materials sites within 0.25 mile of an R3 Zoning District Update site, as shown in Table 4.7-1.

Figure 4.7-1 Hazardous Materials Sites in Mountain View



Imagery provided by Microsoft Bing and its licensors © 2025.
Additional data provided by Geotracker; accessed July 2025, US EPA, 2025.

Table 4.7-1 Active and Open Hazardous Materials Sites within 0.25 mile of a R3 Zoning District Update Site

Hazardous Materials Site	Hazardous Materials Site Address	Hazardous Site Type	Hazardous Site Status
Mora Drive	2221-2229 Mora Drive	Voluntary Agreement	Active
Proposed San Antonio Elementary School	435 San Antonio Road, 2535 California Street, 350, 506, 510-520 Showers Drive	School	Active
Sunbeam Cleaners	128 N. Rengstorff Avenue	Cleanup Program Site	Open – Assessment & Interim Remedial Action
Montecito Multifamily	1265 Montecito Avenue	Cleanup Program Site	Open – Site Assessment
World Plaza	660 San Antonio Road	Cleanup Program Site	Open – Verification Monitoring
Reliance Construction	1080 Wentworth Street	Inspection	Significant Non-Complier
@Home LLC	1313-1347 West El Camino Real	Cleanup Program Site	Open – Site Assessment
954 Villa Street	954 Villa Street	Voluntary Agreement	Active
Fluff Dry Cleaning	801-819 West El Camino Real	Voluntary Agreement	Active
2019 Leghorn Development	2019 Leghorn Street	Cleanup Program Site	Open – Verification Monitoring
525-569 East Evelyn Avenue	525-569 East Evelyn Avenue	Cleanup Program Site	Open – Remediation
Former Blossom Valley Dry Cleaning	1782 Miramonte Avenue	Cleanup Program Site	Open – Site Assessment
Former Telewave Property	1155 Terra Bella Avenue	Cleanup Program Site	Open – Site Assessment
LH Shoreline LP Development	1001 North Shoreline Boulevard	Cleanup Program Site	Open – Verification Monitoring
LMTNV Mountain View	1950 Leghorn Street	Cleanup Program Site	Open – Inactive
MCZ-Central Development	730 Central Avenue	Cleanup Program Site	Open – Inactive
Moffett Gateway	750 Moffett Boulevard	Cleanup Program Site	Open – Site Assessment
Montwood – GW	1625 Plymouth Street	Cleanup Program Site	Open – Remediation – Land Use Restrictions
Montwood – VI	1625 & 1615 Plymouth Street	Cleanup Program Site	Open – Long Term Management
Peery/Arrilliaga	1098 Alta Avenue	Cleanup Program Site	Open – Remediation
Rucker & Kolls Facility	1305 Terra Bella Avenue	Cleanup Program Site	Open – Inactive
Sobrato – 590 Castro Street	590 Castro Street	Cleanup Program Site	Open – Site Assessment
Spectra – Physics Lasers	1250 West Middlefield Road	Cleanup Program Site	Open – Inactive
Teledyne Semiconductor	1300 Terra Bella Avenue	Cleanup Program Site	Open – Remediation – Land Use Restrictions
West Middlefield Summerhill Development	1555 West Middlefield Road	Cleanup Program Site	Open – Site Assessment -Land Use Restrictions

Source: Department of Toxic Substances Control 2025, State Water Resources Control Board 2025

Use, Transport, and Abatement of Hazardous Materials

The use of hazardous materials is typically associated with industrial land uses. Activities such as manufacturing, plating, cleaning, refining, and finishing frequently involve chemicals that are considered hazardous when accidentally released into the environment.

To a lesser extent, hazardous materials may also be used by various commercial enterprises, as well as residential uses. In particular, dry cleaners historically have used cleaning agents that are hazardous materials. Hardware stores typically stock paints and solvents, as well as fertilizers, herbicides, and pesticides. Swimming pool supply stores stock acids, algaecides, and caustic agents. Most commercial businesses occasionally use commonly available cleaning supplies that, when used in accordance with manufacturers' recommendations, are considered safe by the State of California, but when not handled properly can be considered hazardous. Private residences and building contractors also use and store commonly available cleaning materials, paints, solvents, swimming pool and spa chemicals, as well as fertilizers, herbicides, and pesticides. The project area includes both commercial and residential land uses.

If improperly handled, hazardous materials can result in public health hazards through human contact with contaminated soils or groundwater, or through airborne releases in vapors, fumes, or dust. There is also the potential for accidental or unauthorized releases of hazardous materials that would pose a public health concern. The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, State, and local regulations. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous waste transporters are required to complete and carry a hazardous waste manifest, which includes forms, reports, and procedures designed to seamlessly track hazardous waste.

Schools

School locations require consideration because children are particularly sensitive to hazardous materials exposure. Additional protective regulations apply to projects that could use or disturb potentially hazardous products near or at schools. The California Public Resources Code requires projects that would be located within 0.25 mile of a school and might reasonably be expected to emit or handle hazardous materials to consult with the school district regarding potential hazards. As discussed in Section 4.12, *Public Services and Recreation*, three different public school districts, Mountain View Whisman School District, Los Altos School District, and Mountain View Los Altos Unified School District, operate several schools that serve the project area. Public schools, private schools, and other childcare centers and preschools may be located within 0.25 miles of the R3 Zoning District Update sites.

Schools near change areas include the following:

- Monta Loma Elementary at 460 Thompson Avenue, near Change Area 3
- Stevenson Elementary at 750 San Pierre Way, near Change Area 8
- Theuerkauf Elementary at 1624 San Luis Avenue, near Change Area 8
- Gabriela Mistral Elementary at 505 Escuela Avenue, near Change Area 6
- Mariano Castro Elementary at 500 Toft Street, near Change Area 6
- Landels Elementary School at 115 W Dana Street, near Change Area 11
- Jose Antonio Vargas Elementary at 220 North Whisman Road, near Change Area 12.

Airports

The Moffett Federal Airfield is located between the cities of Mountain View and Sunnyvale, with portions of the city being located within the airport influence area, as shown in Figure 4.7-2 (Santa Clara County Airport Land Use Commission 2012).

4.7.2 Regulatory Setting

a. Federal Regulations

Primary federal agencies with responsibility for hazardous materials management include the U.S. EPA, U.S. Department of Labor's Occupational Safety and Health Administration (OSHA), and the U.S. Department of Transportation (USDOT). The major laws enforced by these agencies are described below.

United States Environmental Protection Agency

U.S. EPA is the agency primarily responsible for enforcement and implementation of federal laws and regulations pertaining to hazardous materials. Applicable federal regulations pertaining to hazardous materials are contained in the Code of Federal Regulations (CFR) Titles 29, 40, and 49. Hazardous materials, as defined in the CFR, are listed in 49 CFR 172.101. The management of hazardous materials is governed by the following laws, which include specific requirements for facilities that generate, use, store, treat, and/or dispose of hazardous materials. U.S. EPA provides oversight and supervision for federal Superfund investigation/remediation projects, evaluates remediation technologies, and develops hazardous materials disposal restrictions and treatment standards.

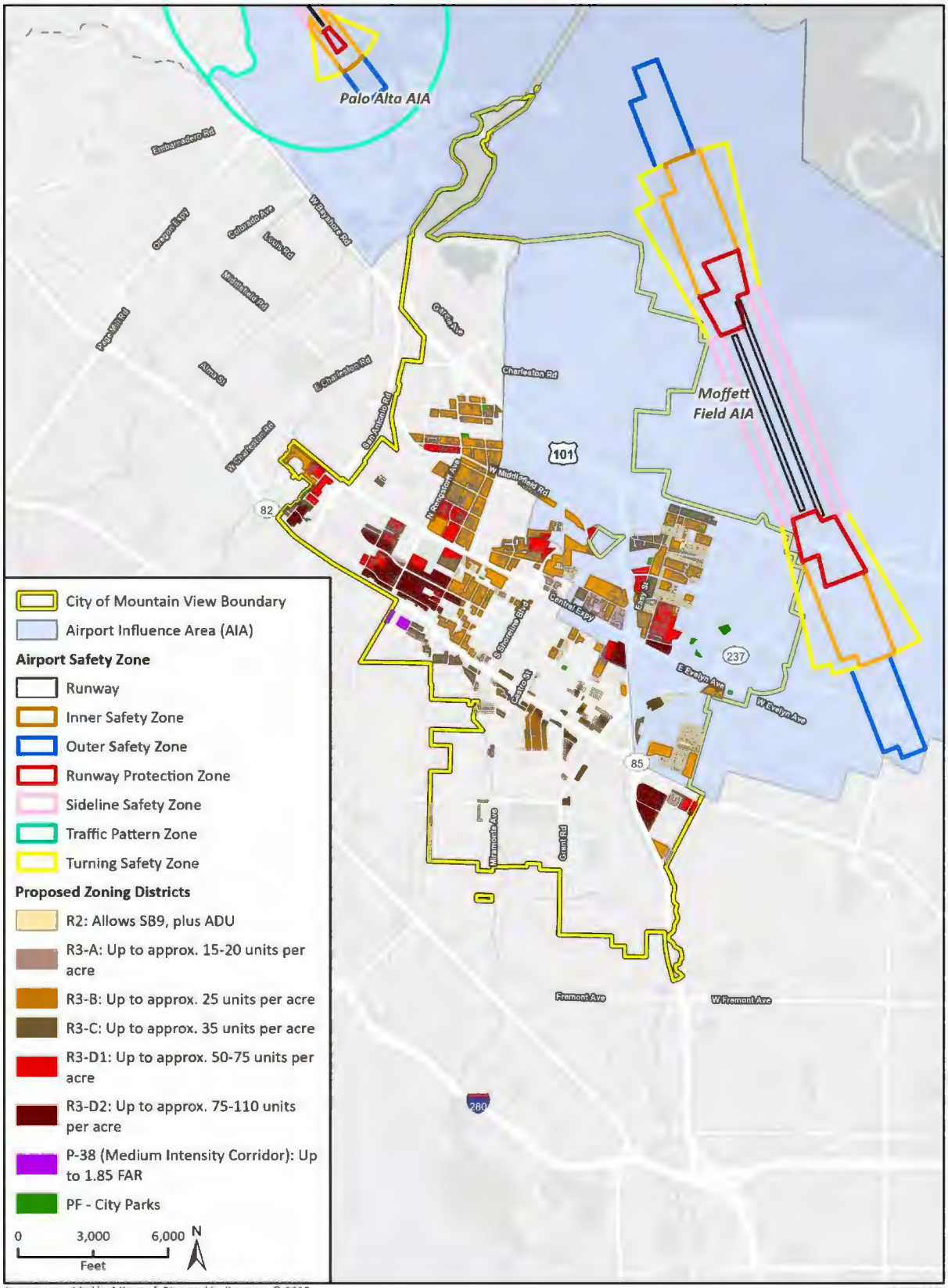
Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act (1976)

These acts established a program administered by U.S. EPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. The Resource Conservation and Recovery Act was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

Comprehensive Environmental Response, Compensation and Liability Act (1980), amended by the Superfund Amendments and Reauthorization Act (1986; Public Law 99-499)

CERCLA was enacted in 1980 and provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Among other things, CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled revision of the National Contingency Plan, which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List.

Figure 4.7-2 Moffett Federal Airfield Airport Influence Area



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Additional data provided by Santa Clara County, 2025.

The Superfund Amendments and Reauthorization Act amended CERCLA to reflect lessons learned by U.S. EPA during the first six years administering the Superfund program. The Superfund Amendments and Reauthorization Act provided new enforcement authorities and settlement tools, increased the focus on human health problems posed by hazardous waste sites, and encouraged greater citizen participation in making decisions on how sites should be cleaned up. The law also increased state involvement in every phase of the Superfund program and required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations.

Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations

Governed by the U.S. Department of Housing and Urban Development (HUD), regulations for LBP are contained in the Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations (CFR) 33, which requires sellers and lessors to disclose known LBP and LBP hazards to perspective purchasers and lessees. Additionally, all LBP abatement activities must follow California and federal occupational safety and health administrations (California Occupational Safety and Health Administration [Cal/OSHA] and federal Occupational Safety and Health Administration [OSHA], respectively, and with the State of California Department of Health Services requirements. Only LBP trained and certified abatement personnel can perform abatement activities. All lead and LBP removed from structures must be hauled and disposed of by a transportation company licensed to transport this type of material at a landfill or receiving facility licensed to accept the waste.

U.S. Department of Transportation Regulations

USDOT prescribes strict regulations for the safe transportation of hazardous materials, including requirements for hazardous waste containers and licensed haulers that transport hazardous waste on public roads. The Secretary of the USDOT receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in in 49 U.S. Code (U.S.C.) Section 5101 et seq. The Secretary is authorized to issue regulations to implement the requirements of 49 U.S.C. The Pipeline and Hazardous Materials Safety Administration (PHMSA), formerly the Research and Special Provisions Administration, was delegated the responsibility to write the hazardous materials regulations, which are contained in Title 49 of the CFR Parts 100-180. Title 49 of the CFR, which contains the regulations set forth by the HMTA, specifies requirements and regulations with respect to the transport of hazardous materials. It requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Under the HMTA, the Secretary "may authorize any officer, employee, or agent to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to: (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any 'person' in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any 'person' of hazardous materials in commerce.

Occupational Safety and Health Act of 1970

The U.S. Department of Labor’s Occupational Safety and Health Administration (OSHA) was created to assure safe and healthful working conditions by setting and enforcing standards and by providing training, outreach, education, and assistance. OSHA provides standards for general industry and construction industry on hazardous waste operations and emergency response. The Occupational

Safety and Health Act, which is implemented by OSHA, contains provisions with respect to hazardous materials handling. Federal Occupational Safety and Health Act requirements, as set forth in Title 29 of the CFR Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right-to-know. OSHA has delegated the authority to administer OSHA regulations to the State of California.

Title 49 of the CFR, which contains the regulations set forth by the Hazardous Materials Transportation Act of 1975, specifies additional requirements and regulations with respect to the transport of hazardous materials. Title 49 of the CFR requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity specific requirements.

b. State Regulations

Department of Toxic Substances Control

As a department of the California Environmental Protection Agency, the DTSC is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. The DTSC regulates hazardous waste in California primarily under the authority of the Resource Conservation and Recovery Act (RCRA) and the California HSC.

The DTSC also administers the California Hazardous Waste Control Law (HWCL) to regulate hazardous wastes. While the HWCL is generally more stringent than the RCRA, both State and federal laws apply in California. The HWCL lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Government Code Section 65962.5 requires the DTSC, the State Department of Health Services, the State Water Resources Control Board, and the California Department of Resources Recycling and Recovery (CalRecycle) to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the State. The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included.

If any soil is excavated from a site containing hazardous materials, it would be considered a hazardous waste if it exceeded specific criteria in Title 22 of the California Code of Regulations (CCR). Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

California Health and Safety Code Chapter 6.7, Underground Storage of Hazardous Substances

Chapter 6.7 of the California HSC regulates the underground storage of hazardous substances to protect public health and the environment. It mandates that owners and operators of USTs comply with strict requirements for the design, construction, installation, and maintenance of these tanks to prevent leaks and spills. The chapter includes provisions for obtaining permits, conducting regular inspections, and implementing spill containment measures. It also requires financial responsibility for cleanup costs in case of leaks and outlines penalties for non-compliance.

California Code of Regulations Title 8, Hazardous Waste Operations and Emergency Response and Hazard Communication Standard

Title 8, Section 5192 of the CCR governs hazardous waste operations and emergency response to ensure worker safety and environmental protection. It mandates comprehensive safety and health programs for hazardous waste site clean-ups, including training, protective equipment, and emergency procedures. Title 8, Section 5194, known as the Hazard Communication Standard, requires employers to inform and train employees about hazardous chemicals in the workplace through labels, safety data sheets, and a written hazard communication program. Both sections aim to mitigate risks associated with hazardous substances and ensure compliance with safety standards.

California Occupational Safety and Health Act – California Labor Code, Section 6300 et seq.

The California Occupational Safety and Health Act of 1973 addresses California employee working conditions, enables the enforcement of workplace standards, and provides for advancements in the field of occupational health and safety. The Act also created CalOSHA, the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. CalOSHA's standards are generally more stringent than federal regulations. Under the former, the employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure. The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings. At sites known or suspected to be contaminated by hazardous materials, workers must have training in hazardous materials operations and a Site Health and Safety Plan must be prepared, which establishes policies and procedures to protect workers and the public from exposure to potential hazards at the contaminated site.

California Code of Regulations, Title 22, Hazardous Waste Management

At the State level, under Title 22, Division 4.5 of the CCR, DTSC regulates hazardous waste in California primarily under the authority of the Federal RCRA and the California HSC. The HWCL, under CCR 22, Chapter 30, establishes regulations that are similar to RCRA but more stringent in their application and empowers the DTSC to administer the State's hazardous waste program and implement the federal program in California. The DTSC is responsible for permitting, inspecting, ensuring compliance, and imposing corrective action programs to ensure that entities that generate, store, transport, treat, or dispose of potentially hazardous materials and waste comply with federal and State laws. The DTSC defines hazardous waste as waste with a chemical composition or other properties that make it capable of causing illness, death, or some other harm to humans and other life forms when mismanaged or released into the environment. The DTSC shares responsibility for

enforcement and implementation of hazardous waste control laws with the SWRCB and, at the local level, the San Francisco Bay RWQCB, and city and county governments.

California Code of Regulations Title 23, Chapter 15 Discharges of Hazardous Waste to Land Section 2511 (b)

CCR 23, Chapter 15 Discharges of Hazardous Waste to Land Section 2511(b) pertains to water quality aspects of waste discharge to land. The regulation establishes waste and site classifications as well as waste management requirements for waste treatment, storage, or disposal in landfills, surface impoundments, waste piles, and land treatment facilities. Requirements are minimum standards for proper management of each waste category, which allows regional water boards to impose more stringent requirements to accommodate regional and site-specific conditions. In addition, the requirements of CCR 23, Chapter 15 applies to cleanup and abatement actions for unregulated hazardous waste discharges to land (e.g., spills).

California Fire and Building Code

The Fire and Building Code establishes the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare for the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of this code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout the State of California.

Proposition 65

Proposition 65, officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986, was enacted as a ballot initiative in November 1986. The proposition protects the State's drinking water sources from being contaminated with chemicals known to cause cancer, birth defects or other reproductive harm, and requires businesses to inform Californians (“Proposition 65 Warning”) about exposures to such chemicals. Proposition 65 requires the State to maintain and update a list of chemicals known to the State to cause cancer or reproductive toxicity.

c. Local Regulations

Santa Clara County Multi-Jurisdiction Hazard Mitigation Plan (MJHMP)

The Santa Clara County Multi-Jurisdiction Hazard Mitigation Plan (MJHMP) establishes a framework for local jurisdictions to mitigate long-term risks from natural and human-induced hazards. The MJHMP was developed in compliance with federal regulations under the Disaster Mitigation Act and FEMA’s Local Mitigation Planning Policy Guide and was adopted in 2023. The MJHMP establishes eligibility for federal hazard mitigation funding and supports integration with local general plans and their safety elements and provides a framework for coordination mitigation efforts across the County’s operational area and participating jurisdictions.

Santa Clara County Hazardous Materials Compliance Division (HMCD)

The State Secretary for Environmental Protection has designated the Santa Clara County Hazardous Materials Compliance Division (HMCD) as the local Certified Unified Program Agency (CUPA). The CUPA is responsible for inspecting facilities in the county that handle hazardous materials, generate or treat hazardous waste, or operate USTs. Through education and enforcement, the CUPA works to reduce risks to public health and the environment. It also shares key facility information with local fire agencies to support emergency response. Facilities storing hazardous materials above certain thresholds must obtain permits and comply with applicable regulations. Disclosure is required if materials exceed 55 gallons, 500 pounds, or 200 cubic feet for 30 days or more in a year, or if any amount of hazardous waste, Category I or II pesticides, explosives, or extremely hazardous substances above threshold planning quantities are present. The HMCD also has a Local Oversight Program and a Site Cleanup Program to oversee assessment and mitigation of properties contaminated by hazardous materials in the County.

Bay Area Air Quality Management District Regulation 11 Rule 2

The Bay Area Air Quality Management District (BAAQMD) is a regional agency established in 1955 that regulates air quality and pollution across the nine San Francisco Bay Area counties, including Santa Clara County. BAAQMD Regulation 11 Rule 2, Asbestos Demolition, Renovation, and Manufacturing establishes a framework to control asbestos emissions during activities that disturb ACM. Regulation 11 Rule 2 was adopted in 1976 and amended through 1998 to regulate demolition, renovation, milling, manufacturing, and waste disposal involving ACM with the aim to protect public health through the prevention of airborne asbestos emissions.

City of Mountain View Emergency Operations Center

The City of Mountain View's Emergency Operations Center (EOC) manages emergency preparedness and response at a strategic level. During disasters, the EOC oversees overall coordination and decision-making. Its primary functions include collecting and analyzing information, making decisions to protect lie and property, ensuring continuity of city operations, and communicating those decisions to relevant departments, agencies, and residents.

Moffett Federal Airfield Comprehensive Land Use Compatibility Plan

The Moffett Federal Airfield Comprehensive Land Use Plan (CLUP) was adopted by the Santa Clara County Airport Land Use Commission to establish a framework for ensuring land use compatibility around the federally operated airport. The Plan aims to safeguard public welfare by minimizing the risks associated with aircraft operations, including noise exposure, accident potential, and airspace obstructions. It designates an Airport Influence Area within all proposed land use changes must be evaluated for consistency with the CLUP policies. The CLUP designates zones based on noise contours, height restrictions, and safety criteria. Noise compatibility is addressed using the Community Noise Equivalent Level (CNEL), which requires residential development within the 65 dB CNEL contour to implement noise mitigation. Height restrictions are based on Federal Aviation Regulations Part 77, and safety zones are established to limit population density and restrict high0riksk land uses such as schools and fuel storage near runway ends and flight paths. The ALUC oversees plan adoption and consistency reviews, while local agencies and cities are responsible for integrating CLUP policies into plans.

Mountain View 2030 General Plan

The Mountain View 2030 General Plan Public Safety, Infrastructure and Conservation, and Land Use and Design Elements include the following goals and policies related to hazardous materials (City of Mountain View 2012).

Goal PSA-1: A high level of community safety with police, fire and emergency response services that meet or exceed industry-accepted service standards.

Policy PSA 1.2 Design for Safety. Support and promote crime prevention and fire safety strategies in the design of new developments.

Goal PSA-3: A community protected from fire, hazardous materials and environmental contamination.

Policy PSA 3.1 Minimized losses. Minimize property damage, injuries and loss of life from fire.

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.

Goal PSA-4. A well-prepared community that has developed plans to minimize risks from environmental and human-induced disasters.

Policy PSA 4.2 Natural disasters. Minimize impacts of natural disasters.

Goal PSA-5: The protection of life and property from seismic hazards.

Policy PSA 5.1 New development. Ensure new development addresses seismically induced geologic hazards.

Goal INC-18: Prevention and remediation of contamination in groundwater, surface water, soil and from soil vapor and vapor intrusion.

Policy INC 18.1. Contamination prevention. Protect human and environmental health from environmental contamination.

Policy INC 18.2: Contamination clean-up. Cooperate with local, state and federal agencies that oversee environmental contamination and clean-up.

Goal LUD-2: Effective coordination with regional agencies and other local governments on planning issues.

Policy LUD 2.5. Moffett Federal Airfield. Encourage compatible land uses within the Airport Influence Area for Moffett Federal Airfield as part of Santa Clara County's Comprehensive Land Use Plan.

Mountain View City Code

Chapter 24 of the Mountain View City Code regulates the storage, handling, and disposal of hazardous materials and other regulated materials consistent with local, federal, and state regulations and provides standards for the storage, handling, and dispensing of hazardous materials.

For construction activities that may affect public streets, the City will require applicants to obtain either an Encroachment Permit pursuant to Section 27.17 or an Excavation Permit pursuant to Section 27.31, depending on the scope of work. These permits include the requirement to develop and implement a traffic Control Plan. If utility work would cross a signalized intersection, Mountain View City Code requires this to be done in phases. Traffic Control Plans must illustrate existing lane striping, traffic patterns, directional arrows, medians, cones, signage, and any other safety devices for each phase of construction.

Mountain View Fire Department

The Mountain View Fire Department (MVFD) acts as a Participating Agency within the Unified Program, and as such implements several hazardous materials programs for the City of Mountain View. This involves enforcement of compliance with requirements for the safe storage, handling, and dispensing of hazardous materials pursuant to the Hazardous Materials Permit Code Ordinance.

Mountain View Standard Conditions of Approval

The City has standard conditions relating to hazards and hazardous materials for construction activities, as discussed below.

Toxic Assessment

The applicant must submit a toxic assessment report with the building permit application. They must show that no hazardous materials are present on the site or that construction and the site are approved by the City's Fire Department, the State Department of Health Services, the Regional Water Quality Control Board, and any relevant federal agency. Building permits will not be issued until all agencies with jurisdiction confirm the site is clean or approve a toxics mitigation plan.

Hazardous Materials Contamination

The following measures are to be included in the Project to reduce the potential for construction workers and adjacent uses to encounter contamination from ACM and LBP.

a. In conformance with local, State, and Federal laws, an asbestos building material survey and a lead-based paint survey shall be completed by a qualified professional to determine the presence of ACMs and/or LBP on the structures proposed for demolition. The surveys shall be completed prior to demolition work beginning on the structures.
b. A registered asbestos abatement contractor shall be retained to remove and dispose of all potentially friable ACMs, in accordance with the National Emissions Standards for Hazardous Air Pollutants (NESHAP) guidelines, prior to building demolition that may disturb the materials. All construction activities shall be undertaken in accordance with Cal/OSHA standards, contained in Title 8 of the CCR, Section 1529, to protect workers from exposure to asbestos. Materials containing more than 1 percent asbestos are also subject to Bay Area Air Quality Management District (BAAQMD) regulations.

c. During demolition activities, all building materials containing LBP shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR 1532.1, including employee training, employee air monitoring, and dust control. Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the waste being disposed.

Discovery of Contaminated Soils

If contaminated soils are discovered, the applicant will ensure the contractor employs engineering controls and Best Management Practices (BMPs) to minimize human exposure to potential contaminants. Engineering controls and construction BMPs will include, but not be limited to, the following: (a) contractor employees working on-site will be certified in OSHA's 40 hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training; (b) the contractor will stockpile soil during redevelopment activities to allow for proper characterization and evaluation of disposal options; (c) the contractor will monitor area around construction site for fugitive vapor emissions with appropriate field screening instrumentation; (d) the contractor will water/mist soil as it is being excavated and loaded onto transportation trucks; (e) the contractor will place any stockpiled soil in areas shielded from prevailing winds; and (f) the contractor will cover the bottom of excavated areas with sheeting when work is not being performed.

Building Demolition PCB Control

Non-wood frame buildings constructed before 1981 that will be completely demolished are required to conduct representative sampling of priority building materials that may contain polychlorinated biphenyls (PCBs). If sample results of one or more priority building materials show PCBs concentrations ≥50 ppm, the applicant is required to follow applicable Federal and State notification and abatement requirements prior to demolition of the building. Submit a completed "Polychlorinated Biphenyls (PCBs) Screening Assessment Applicant Package" with the building demolition plans for the Project. A demolition permit will not be issued until the completed "PCBs Screening Assessment Applicant Package" is submitted and approved by the City Fire and Environmental Protection Division (FEPD). Applicants are required to comply with applicable Federal and State regulations regarding notification and abatement of PCBs-containing materials. Contact the City's FEPD at 650-903-6378 to obtain a copy of the "PCBs Screening Assessment Applicant Package" and related guidance and information.

Hazardous Materials

If hazardous materials will be stored or used on-site (including paints, thinners, compressed gases, propane, diesel, gasoline, etc.), complete an Environmental Compliance Plan (ECP) application. Attach a copy of the completed ECP to your building plan submittal.

Construction Management Plan

Upon submittal of the initial building permit and all subsequent building permit submittals, the applicant shall provide a construction traffic and parking management plan with the building plans. The plan must be approved prior to the issuance of a building permit, including demolition. The plan must show the following:

1. **Truck Route:** Truck route (to and from Project site) for construction and delivery trucks pursuant to City Code Sections 19.58 and 19.59 and which does not include neighborhood residential streets;

2. **Construction Phasing, Equipment, Storage, and Parking:** Show and identify construction vehicle and equipment parking area, material storage and lay-down area, sanitation facilities, and construction trailer location for each phase of construction. All construction vehicles, equipment, and trailer shall be located on-site or at a site nearby (not on a public street or public parking) arranged by the permittee/contractor. Construction equipment, materials, or vehicles shall not be stored or parked on public streets or public parking lots, unless approved by the Public Works Director due to special conditions. Construction contractors/workers are required to park on-site or at a private property arranged by the permittee/contractor and shall not be allowed to use neighboring streets for parking/storage; and
3. **Sidewalks:** Sidewalk closure or narrowing is not allowed during any on-site construction activities.
4. **Traffic Control and Detour Plans:** Traffic control plans, including detour plans, shall be submitted to the Public Works Department for review and approval and included with building permit plans to the Building Inspection Division for any on-site improvements and/or work related to any phase of the construction management plan that requires temporary roadway closure, lane closure, shoulder closure, and/or bike lane closure. Pedestrian detour plans shall be provided when necessary. Traffic control plans shall be prepared in accordance with the latest edition of the California Manual of Uniform Traffic Control Devices (CA MUTCD). A completed Traffic Control Checklist shall be included with each traffic control plan submittal. A separate Excavation Permit from the Public Works Department may be required prior to issuance of the building permit.

4.7.3 Impact Analysis

Methodology and Thresholds of Significance

Methodology

The Project's impacts related to hazards and hazardous materials are evaluated based on the Project's adherence to local, state, and federal requirements; the nature of proposed soil disturbance, construction activities, and its potential to release hazardous materials; the change in land use and proposed operational activities; proximity to schools and airports; the nature of proposed development and its potential to impair emergency access; and the risk of wildland fires.

Significance Thresholds

To determine whether a project would result in a significant impact to Hazards and Hazardous Materials, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school;

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

Project Impacts and Mitigation Measures

Threshold 1:	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
Threshold 2:	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?

Impact HAZ-1 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD FACILITATE NEW RESIDENTIAL DEVELOPMENT ON THE PROPOSED REZONING PARCELS. PROPOSED RESIDENTIAL DEVELOPMENT WOULD NOT INVOLVE ROUTINE TRANSPORTATION, USE, OR DISPOSAL OF HAZARDOUS MATERIALS. HOWEVER, CONSTRUCTION OF NEW RESIDENCES COULD RESULT IN AN INCREASE IN THE OVERALL ROUTINE, TRANSPORT, USE, AND DISPOSAL OF HAZARDOUS MATERIALS NEAR RESIDENTIAL LAND USES. NONETHELESS, REQUIRED COMPLIANCE WITH APPLICABLE REGULATIONS RELATED TO HAZARDOUS MATERIALS WOULD MINIMIZE THE RISK OF RELEASES AND EXPOSURE TO THESE MATERIALS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction and Demolition

As described in Section 4.7.1, *Setting*, within the project area, there are 25 identified open or active hazardous materials sites within 0.25 mile of an R3 Zoning District Update site. These active hazardous materials sites are related to historical land uses for dry cleaner businesses, chemical manufacturing or storage, and nearby Superfund site plumes, which have resulted in contamination of structures, soil, soil vapor, and/or groundwater (DTSC 2025, SWRCB 2025). Additionally, development facilitated by the Project on parcels that are within or adjacent to closed hazardous materials sites could disturb hazardous materials, even if the cases are closed. Furthermore, development facilitated by the Project would consist of residential development, mostly in areas of Mountain View that are already developed with existing structures. Demolition of existing structures could result in the release of lead, asbestos, and/or PCBs, if existing buildings contain these substances.

Construction associated with future development under the Proposed Project may also include the temporary transport, storage, and use of potentially hazardous materials including fuels, lubricating fluids, cleaners, or solvents. If spilled, these substances could pose a risk to the environment and to human health. However, the transport, storage, use, or disposal of hazardous materials is subject to various federal, State, and local regulations designed to reduce risks associated with hazardous materials, including potential risks associated with upset or accident conditions. Hazardous materials would be required to be transported under U.S. Department of Transportation (DOT)

regulations (U.S. DOT Hazardous Materials Transport Act, 49 Code of Federal Regulations), which stipulate the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. In addition, the use, storage, and disposal of hazardous materials are regulated through the Resources Conservation and Recovery Act (RCRA). The California Department of Toxic Substances Control (DTSC) is responsible for implementing the RCRA program, as well as California's own hazardous waste laws. DTSC regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California. It does this primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (Title 22, California Code of Regulations, Divisions 4 and 4.5). DTSC also oversees permitting, inspection, compliance, and corrective action programs to ensure that hazardous waste managers follow federal and State requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Compliance with existing regulations would reduce the risk of potential release of hazardous materials during construction.

In addition, grading or excavation on sites with existing contamination may result in the transport and disposal of hazardous materials if they are unearthed and removed from the site. However, the removal, transport, storage, use, or disposal of hazardous materials would be subject to federal, state, and local regulations pertaining to the transport, use, storage, and disposal of hazardous materials.

Fluorescent lighting ballasts manufactured prior to 1978 and electrical transformers, capacitors, and generators manufactured prior to 1977 may contain PCBs. In accordance with the Toxic Substances Control Act and other federal and state regulations, individual projects would be required to properly handle and dispose of electrical equipment and lighting ballasts that contain PCBs during demolition of older buildings. The Santa Clara County Department of Environmental Health regulates proper disposal of PCBs.

The proposed R3 Zoning District Update sites include residential buildings that, due to their age, may contain asbestos and/or lead-based paint. Structures built before the 1970s typically contained asbestos-containing materials. Demolition or redevelopment of these structures could result in health hazard impacts to workers if not remediated prior to construction activities. Future development would be required to adhere to Bay Area Air Quality Management District (BAAQMD) Regulation 11, Rule 2, which governs the proper handling and disposal of asbestos containing materials for demolition, renovation, and manufacturing activities in the Bay Area, and California Occupational Safety and Health Administration (CalOSHA) regulations regarding lead-based materials. In addition, the management and disposal of asbestos containing materials and lead based paint would be subject to BAAQMD oversight and approval. Furthermore, the California Code of Regulations, Section 1532.1, requires testing, monitoring, containment, and disposal of lead-based materials, such that exposure levels do not exceed CalOSHA standards. Therefore, with adherence to State and local regulations, risk of public exposure to hazardous materials and impacts related to hazards and hazardous materials during construction would be less than significant.

Operation

The Proposed Project is intended to expand residential development and would not facilitate the establishment of uses that would sell, use, store, transport, or release substantial quantities of hazardous materials such as industrial, warehouse, automotive service, or manufacturing uses. Residential uses do not typically use hazardous materials other than small amounts for cleaning and

landscaping. These materials would not be different from household chemicals and solvents already in wide use throughout Mountain View. Residents are anticipated to use limited quantities of products routinely for periodic cleaning, repair, and maintenance or for landscape maintenance/pest control that could contain hazardous materials. Those using such products would be required to comply with all applicable regulations regarding the disposal of household waste. Therefore, operation of new residential uses poses little risk of exposing the public to hazardous materials, and impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation measures are required.

Threshold 3:	Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Impact HAZ-2 DEVELOPMENT FACILITATED BY THE PROJECT MAY RESULT IN THE RELEASE OF HAZARDOUS MATERIALS WITHIN 0.25 MILE OF A SCHOOL. HOWEVER, COMPLIANCE WITH REGIONAL AND FEDERAL REGULATIONS RELATED TO HAZARDOUS MATERIALS WOULD MINIMIZE THE RISK OF RELEASES AND EXPOSURE TO THESE MATERIALS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

There are several schools located within 0.25 miles of the R3 Zoning District Update sites, such as Monta Loma Elementary near Change Area 3, Stevenson Elementary and Theuerkauf Elementary near Change Area 8, Gabriela Mistral Elementary and Mariano Castro Elementary near Change Area 6, Landels Elementary School near Change Area 11, and Jose Antonio Vargas Elementary near Change Area 12. The Proposed Project would facilitate residential development in the vicinity of these schools.

However, the Proposed Project would not involve new industrial or manufacturing uses, or involve the use, storage, disposal, or transportation of significant quantities of hazardous materials. Future development on the R3 Zoning District Update sites may involve use and storage of some materials considered hazardous, though primarily these would be limited to solvents, paints, chemicals used for cleaning and building maintenance, and landscaping supplies. These materials would not be different from household chemicals and solvents already in general and wide use throughout the city. Development accommodated under the Project therefore would not pose as a health risk to nearby schools or childcare facilities.

Additionally, as mentioned above under Impact HAZ-1, construction activities associated with future development may include the temporary transport, storage, and use of potentially hazardous materials including fuels, lubricating fluids, cleaners, or solvents. Specifically, demolition of existing buildings and grading and excavation activities associated with new construction may result in emissions and transport of hazardous materials within 0.25 mile of existing schools. Compliance with existing applicable regulations and policies would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials. Oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these substances. Overall, impacts related to release of hazardous materials within 0.25 mile of an existing or proposed school would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation measures are required.

Threshold 4:	Would the project be located on a site that is included on a list of hazardous material 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?

Impact HAZ-3 DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN DEVELOPMENT ON SITES LISTED PURSUANT TO GOVERNMENT CODE SECTION 65962.5. HOWEVER, COMPLIANCE WITH APPLICABLE REGULATIONS RELATING TO SITE ASSESSMENT AND REMEDIATION, AND IMPLEMENTATION OF MITIGATION MEASURE HAZ-1, WOULD MINIMIZE IMPACTS FROM DEVELOPMENT, RESULTING IN A LESS THAN SIGNIFICANT IMPACT WITH MITIGATION.

As described in Section 4.7.1, *Existing Hazardous Materials Sites*, there are five active hazardous materials sites, three open sites in the assessment and interim remediation stage, one open site eligible for closure, seven open inactive sites, two open sites under long-term management, five open sites under remediation, 10 open sites under assessment, five open sites in the verification monitoring stage, and one significant non-complier within the project area, in addition to 243 closed sites within the City of Mountain View. The closed status of the 243 sites indicates that each site has completed remedial or cleanup actions and a formal closure decision document has been issued for the site. These sites have undergone investigation, remediation, and cleanup under the supervision of the San Francisco Bay RWQCB, the Santa Clara County Hazardous Materials Compliance Division, and/or DTSC, as appropriate. However, development facilitated by the Project on parcels that are within or adjacent to closed hazardous materials sites could disturb hazardous materials, even if the cases are closed. Three of the active sites are voluntary agreement sites while two are school sites, the 33 open sites are cleanup program sites, and the significant non-complier is under inspection. Two of the R3 Zoning District Update sites are directly on one of the hazardous materials sites, although there are 25 open sites within 0.25 mile of a R3 Zoning District Update as shown in Table 4.7-1.

Additionally, there are R3 Zoning District Update sites that fall within the boundaries of Superfund sites. However, these areas already have existing residential development, and an increase in allowed residential density would not exacerbate Superfund site contamination. Development in these areas would also require the establishment of institutional controls to verify maintenance of vapor intrusion systems. Compliance with existing regulations for development within these Superfund sites and implementation of Mitigation Measure HAZ-1 would be required to reduce impacts.

The Project would not change whether development is allowed to occur on hazardous materials sites compiled pursuant to Government Code Section 65962.5. Instead, the Project would increase the allowed density and intensity of development on specific parcels. Furthermore, as clarified in CEQA Guidelines Section 15162.2(a) and affirmed by the California Supreme Court in California Building Industry Association v. Bay Area Air Quality Management District (2015), agencies are not required to analyze how existing environmental conditions might affect future users or residents of a project unless the project has the potential exacerbate those existing conditions. As discussed under Impact HAZ-1, construction associated with future development under the Proposed Project may also include the temporary transport, storage, and use of potentially hazardous materials including fuels, lubricating fluids, cleaners, or solvents. If spilled, these substances could pose a risk to the environment and to human health. However, the transport, storage, use, or disposal of

hazardous materials is subject to various federal, State, and local regulations designed to reduce risks associated with hazardous materials, including potential risks associated with upset or accident conditions. The Proposed Project is intended to expand residential development and would not facilitate the establishment of uses that would sell, use, store, transport, or release substantial quantities of hazardous materials such as industrial, warehouse, automotive service, or manufacturing uses. Residential uses do not typically use hazardous materials other than small amounts for cleaning and landscaping. These materials would not be different from household chemicals and solvents already in wide use throughout Mountain View. Therefore, through regulatory compliance, neither construction nor operation of the Project would exacerbate the existing conditions related to hazardous materials, and the development of R3 Zoning District Update sites would not result in a significant hazard to the public or the environment.

If additional parcels within the Project area become listed as hazardous materials sites prior to development, construction would be preceded by investigation, remediation, and cleanup under the supervision of the San Francisco Bay RWQCB, the Santa Clara County Hazardous Materials Compliance Division, and/or DTSC, before any development activities could begin as currently required by federal, State, and local regulations. The agency responsible for oversight would determine the types of remediation and cleanup required and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells on site with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants.

Although some development under the Proposed Project would occur on sites listed pursuant to Government Code Section 65962.5, it would be required to implement Mitigation Measure HAZ-1 described below. With implementation of this measure, such development would not pose a significant hazard to the public or the environment. Additionally, if a parcel becomes listed prior to an application for development, appropriate remediation would be conducted in accordance with applicable regulations. Therefore, impacts would be less than significant with mitigation.

Mitigation Measures

The Proposed Project would be subject to Mitigation Measure HAZ-1 described below. This measure ensures that potential impacts related to hazardous materials would be addressed and reduced to a less than significant level through compliance with applicable remediation and safety protocols.

Mitigation Measure HAZ-1: Phase I Environmental Site Assessment

Prior to the start of construction (demolition or grading), the project applicant shall retain a qualified environmental professional (EP), as defined American Society for Testing and Materials Standard (ASTM) E1527 to prepare a project-specific Phase I Environmental Site Assessment (ESA) in accordance with standard ASTM methodologies, to assess the land use history of the Project site. The Phase I assessment shall include a records review of appropriate federal, State, and local databases within ASTM-listed search distances regarding hazardous materials use, storage, or disposal at the given site, a review of historical topographic maps and aerial photographs, a site reconnaissance, interviews with persons knowledgeable about the sites historical uses, and review of other relevant existing information that could identify the potential existence of Recognized Environmental Conditions, including hazardous materials, or contaminated soil or groundwater. If no Recognized Environmental Conditions are identified, then no further action would be required.

If Recognized Environmental Conditions are identified and the Phase I assessment recommends further action, the Project applicant shall conduct the appropriate follow-up actions, which may include preparation of a Phase II ESA, further records review, sampling of potentially hazardous materials, and possibly site cleanup. In the event that site cleanup is required, the Project shall not proceed until the site has been cleaned up to the satisfaction of the appropriate regulatory agency (e.g., DTSC, RWQCB, or SCCEHD) such that the regulatory agency issues a No Further Action letter or equivalent.

As part of the Phase II ESA, the qualified environmental consultant (PG or PE) shall screen the analytical results against the San Francisco Bay Regional Water Quality Control Board environmental screening levels (ESL). These ESLs are risk-based screening levels under various depth and land use scenarios. The lead agency shall review, approve, and implement recommendations of the Phase II ESA prior to demolition and grading (construction).

Significance After Mitigation

Impacts would be less than significant with implementation of Mitigation Measure HAZ-1.

Threshold 5:	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Impact HAZ-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD BE LOCATED WITHIN AN AIRPORT LAND USE PLAN. HOWEVER, PEOPLE RESIDING OR WORKING IN THE PROJECT AREA WOULD NOT BE EXPOSED TO AIRPORT SAFETY HAZARDS OR EXCESSIVE NOISE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Moffett Federal Airfield Airport Influence Area covers portions of the northern and eastern parts of the city of Mountain View, as shown in Figure 4.7-2. However, all R3 Zoning District Update sites are located outside of the 60, 65, 70, and 75 dB CNEL contours and safety contours generated by the Moffett Federal Airfield (Santa Clara County ALUC 2012). Furthermore, because the Project area is outside the noise contours and the traffic overflight zone designated in the Moffett Federal Airfield LUCP, future residents would not be substantially affected by aircraft noise and overflight hazards. In addition, development facilitated by the Project would be required to comply with the Moffett Federal Airfield LUCP, and applicable regional and local regulations, which establish maximum development heights in various overflight zones and compatible land uses in the Airport Influence Area. Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area related to airport operation and impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation is required.

Threshold 6:	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact HAZ-5 FUTURE DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD NOT IMPAIR IMPLEMENTATION OF AN ADOPTED EMERGENCY RESPONSE OR EVACUATION PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

There are no proposed physical changes under the Project, such as reconstruction or alteration of existing roadways, that would interfere or impair emergency response or evacuation. The Project would not result in changes to emergency evacuation routes. The R3 Zoning District Update sites are infill development sites and it is anticipated that future development would be limited to the sites and would not involve activities that would block access or permanently constrain evacuation routes adopted in an emergency response plan or emergency evaluation plan. As discussed in Section 4.13, *Transportation,* the City maintains the roadway network which would provide access to new development sites in accordance with industry design standards, which ensures that the physical network would be free of obstructions to emergency responders. Development facilitated by the Project would accommodate future population growth in Mountain View and would increase vehicle trips in the Project area. This could lead to increased congestion during emergency evacuations. However, future development facilitated by the Proposed Project would be subject to review by the City of Mountain View Police Department, MVFD, and EOC for compliance with adopted emergency response plans. With the required review by the relevant agencies, impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation is required.

Threshold 7:	Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Impact HAZ-6 THE R3 ZONING DISTRICT UPDATE SITES ARE NOT LOCATED ON OR NEAR WILDLANDS AND WOULD NOT EXPOSE PEOPLE OR STRUCTURES TO WILDLAND FIRES. NO IMPACT WOULD OCCUR.

The R3 Zoning District Update sites consist of primarily infill sites located in urbanized areas of Mountain View which are surrounded by existing development, infrastructure, paved surfaces, and structures. According to maps prepared by the California Department of Forestry and Fire Protection (CAL FIRE), Mountain View is not located in a state responsibility area (SRA) for moderate, high, or very high fire hazard severity zone (FHSZ). Mountain View is located within a local responsibility area (LRA) however, it is not located within a moderate, high, or very high FHSZ. The R3 Zoning District Update sites are not located within or near (within 1 mile of) a Very High Fire Hazard Severity Zone or SRA (California Department of Forestry and Fire Protection 2025). The nearest Very High Fire Hazard Severity Zone is located in Cupertino near Rancho San Antonio Park approximately 3.5 miles southwest of Change Area 13, located at Continental/Dale. Future development under the Proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. No impact would occur.

Mitigation Measures

No impact would occur and no mitigation measures are required.

4.7.4 Cumulative Impacts

IMPACT HAZ-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD NOT RESULT IN A CUMULATIVELY SIGNIFICANT INCREASE IN HAZARDS ASSOCIATED WITH THE USE, TRANSPORT, STORAGE, OR DISPOSAL OF HAZARDOUS MATERIALS, WOULD NOT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT RELATED TO LISTED HAZARDOUS MATERIALS SITES, WOULD NOT EXPOSE SENSITIVE RECEPTORS SUCH AS SCHOOLS TO SUBSTANTIAL HAZARDOUS EMISSIONS, WOULD NOT RESULT IN SIGNIFICANT AIRPORT-RELATED SAFETY HAZARDS, AND WOULD NOT IMPAIR IMPLEMENTATION OF EMERGENCY RESPONSE OR EVACUATION PLANS. CUMULATIVE HAZARDS AND HAZARDOUS MATERIALS IMPACTS WOULD BE LESS THAN SIGNIFICANT, AND THE CONTRIBUTION OF THE PROJECT WOULD NOT BE CUMULATIVELY CONSIDERABLE.

Cumulative projects in proximity to the R3 Zoning District Update sites are listed in Chapter 3, *Environmental Setting.* The geographic scope for cumulative hazardous materials impacts is limited to projects within 0.25 mile of the R3 Zoning District Update sites. This geographic scope is appropriate for hazardous materials because risks associated with hazards and hazardous materials occur largely in a site-specific and localized context as adverse impacts from a hazardous materials release or spill diminish in magnitude with distance.

Cumulative development in the vicinity of any identified hazardous materials sites would gradually increase the population exposed to the use and transport of hazardous materials; the routine use, storage, and disposal of hazardous materials; and listed hazardous materials sites. In addition, cumulative development could contribute to an increase in hazards related to the use of, and exposure to, hazardous materials. The magnitude of hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. As discussed in the impact analysis, development carried out under the Proposed Project may increase the potential for community risk from hazards and hazardous materials. However, future development on the R3 Zoning District Update sites would be subject to General Plan policies and existing laws and regulations. Compliance with applicable policies would reduce cumulative impacts related to the use of and exposure to hazardous materials (Threshold 1 and Threshold 2) to a less than significant level.

Cumulative development in the vicinity of schools would gradually increase the handling of hazardous materials within the vicinities of existing schools, including Monta Loma Elementary School, Stevenson Elementary School, Theuerkauf Elementary School, Gabriela Mistral Elementary School, Mariano Castro Elementary School, Landels Elementary School, and Jose Antonio Vargas Elementary School. However, as discussed above under Impact HAZ-2, hazardous materials involved in the construction of residential development would be limited to materials similar to household chemicals used widely throughout the city. Oversight from applicable agencies and compliance with existing regulations would minimize cumulative impacts related to hazardous emissions and handling of hazardous materials near schools (Threshold 3) to a less than significant level.

The City of Mountain View contains 39 open or active hazardous materials sites and 243 closed or inactive sites. Because these sites are dispersed throughout the city, cumulative development would have the potential to be on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 that may result in a significant hazard to the public or the environment. However, as stated by CEQA Guidelines Section 15162.2(a) and confirmed by the California Supreme Court in California Building Industry Association v. Bay Area Air Quality Management District (2015), agencies are not required to analyze how existing environmental conditions might affect future users of a project unless the project may exacerbate those existing conditions. Cumulative development would be subject to its own environmental review process,

including oversight by the San Francisco Bay RWQCB, Santa Clara County Hazardous Materials Compliance Division, and/or DTSC, in which these potential impacts may be identified and mitigated if necessary. As such, compliance with regulatory oversight, regulations discussed under Impact HAZ-1, and implementation of Mitigation Measure HAZ-1 would minimize cumulative impacts related to hazards to the public and environment due to development on a known hazardous materials site (Threshold 4) to a less than significant level.

Because parts of Mountain View are within the Airport Influence Area of the Moffett Airfield, cumulative development would have the potential to result in a safety hazard or excessive noise for people residing or working in the Project area. However, development within the Airport Influence Area would be required to comply with the Moffett Federal Airfield Comprehensive LUCP, and applicable regional and local regulations related to safety hazards and noise exposure. Compliance with the Moffett Federal Airfield Comprehensive LUCP would minimize cumulative impacts related to safety hazards and excessive noise from airports (Threshold 5) to a less than significant level.

Cumulative development could result in physical changes that could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. However, impacts to emergency response and evacuation of cumulative development would be evaluated on a case-by-case basis, and the jurisdiction in which cumulative development is located in (Mountain View or County of Santa Clara) would review and approve individual cumulative development projects to ensure that emergency access meets applicable local standards. This review would reduce cumulative impacts to emergency response or evacuation (Threshold 6) to a less than significant level.

Overall, hazards and hazardous materials impacts associated with individual developments are site specific in nature and must be addressed on a case-by-case basis. Since hazards and hazardous materials are required to be examined as part of the existing permit application and review process, potential impacts associated with individual projects would be adequately addressed prior to permit approval. With adherence to existing regulatory standards and General Plan policies, no significant cumulative human health impacts would occur, and the Project would not have a cumulatively considerable contribution to a significant cumulative impact related to hazards and hazardous materials.

4.8 Hydrology and Water Quality

This section evaluates the potential environmental effects of the Proposed Project related to water quality, drainage, groundwater, and flooding. The analysis includes a review of surface water, groundwater, inundation zones, and water quality. Water supply is discussed in Section 4.15, *Utilities and Service Systems*. Impacts regarding wetlands and waters of the United States are discussed in Section 4.3, *Biological Resources*.

4.8.1 Setting

The Project area is located on Lower Peninsula Watershed in Santa Clara County, California. Weather in the Project area is characterized by a typical mediterranean coastal climate, which is generally dry in the summer with mild, wet winters. Rainfall is concentrated in the winter months with the wettest months being December, January, and February, which have average monthly rainfall totals of 2.60, 2.74, and 3.10 inches, respectively (United States Climate Data 2025).

Surface Water

Drainage

The California Department of Water Resources (DWR) divides surface watersheds in California into 10 hydrologic regions. The Project area lies within the San Franciso Hydrologic Region, a large coastal region in northern California that consists of approximately 11,300 square miles. The San Franciso Hydrologic Region includes all or major portions of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma counties (San Franciso Bay Regional Water Quality Control Board [RWQCB] 2021)

The DWR subdivides hydrologic regions into hydrologic units which are further subdivided into hydrologic areas. Within the San Franciso Hydrologic Region, the Project area is located entirely in the Santa Clara Basin Hydrologic Unit. The San Francisco Bay RWQCB governs basin planning and water quality within the Santa Clara Hydrologic Area (San Francisco Bay RWQCB 2021).

Surface water resources in Mountain View are within the Santa Clara Basin and transects four watersheds: Adobe Creek, Permanente Creek, Stevens Creek, and Calabazas Creek (City of Mountain View 2012). Adobe Creek is a 14-mile perennial stream originating in the Santa Cruz Mountains, draining a 10-square-mile watershed including mountainous terrain and valley floor communities like Mountain View. Adobe Creek briefly borders Mountain View, contributing surface water drainage by channeling runoff into the Palo Alto Flood Basin through tributaries and urban drains. Stevens Creek Watershed spans 29 square miles and flows through Mountain View into the Lower South Fransico Bay near Long Point; it receives diverted peak flows from Permanente Creek (City of Mountain View 2012). Permanente Creek Watershed covers approximately 17 square miles, flowing downstream through high-density residential neighborhoods in Mountain View with commercial development clustered along major surface streets such as El Camino Real, and discharging into South Bay via Mountain View Slough. Calabazas Creek Watershed drains 20 square miles from the Santa Cruz Mountains and discharges into Guadalupe Slough, contributing to regional drainage near Mountain View's eastern boundary.

Runoff in the city is influenced by sloping topography, soils, storm drain infrastructure, and urban development. The city's stormwater system consists of underground pipes, cross culverts, and pump stations.

Surface Water Quality

Water quality in the region is governed by the San Francisco Bay RWQCB, which sets water quality standards in the *Water Quality Control Plan for the San Franciso Bay Basin* (Basin Plan; San Franciso Bay RWQCB 2021). The Basin Plan identifies beneficial uses for surface water and groundwater and establishes water quality objectives to attain those beneficial uses. The identified beneficial uses and water quality objectives to maintain or achieve those uses are together known as water quality standards. The San Fransico RWQCB designates beneficial uses for some individual water bodies in the Santa Clara Basin. All other water bodies not designated individually are assigned the designated uses of municipal and domestic water supply and protection of recreation and aquatic life. Surface water bodies in the Mountain View include marine habitats along the edge of the Lower South San Fransico Bay, two freshwater ponds, one freshwater emergent wetland, and two riverine habitats (United States Fish and Wildlife Service 2025). Table 4.8-1 presents the designated beneficial uses listed in the Basin Plan for coastal waters which receive runoff from the Project area.

Table 4.8-1 Beneficial Uses for Coastal Waters

Water Body	Water Body Type and Beneficial Uses
Adobe Creek	Perennial Stream, in upper reaches, discharges to the Palo Alto Flood Basin. Cold Freshwater Habitat. Water Contact Recreation. Noncontact Water Recreation. Warm Freshwater Habitat. Wildlife Habitat
Mountain View Slough	Tidal Slough at mouth of Permanente Creek. Estuarine Habitat. Preservation of Rare and Endangered Species. Water Contact Recreation. Noncontact Water Recreation. Wildlife Habitat
Permanente Creek	Perennial Stream, in upper reaches, discharges to San Francisco Estuary via Mountain View Slough. Groundwater Recharge. Cold Freshwater Habitat. Preservation of Rare and Endangered Species. Spawning. Warm Freshwater Habitat. Water Contact Recreation. Noncontact Water Recreation. Wildlife Habitat
Hale Creek	Perennial Stream with typically low summer flows, tributary to Permanente Creek. Cold Freshwater Habitat. Water Contact Recreation. Noncontact Water Recreation. Warm Freshwater Habitat. Wildlife Habitat
Stevens Creek	Perennial Stream, discharges to the San Francisco Estuary north of Moffett Field Naval Air Station. Freshwater Replenishment. Coldwater Freshwater Habitat. Preservation of Rare and Endangered Species. Fish Spawning. Water Contact Recreation. Noncontact Water Recreation. Warm Freshwater Habitat. Wildlife Habitat

Source: San Fransico Bay RWQCB 2021

In the city, stormwater runoff transports pollutants from urban development, streets, parking lots, and other sources to the Lower South San Francisco Bay and two riverine habitats. Activities such as land clearing, excavation and filling, illegal dumping, municipal operations, mining activities, improper disposal of animal waste, and use of fertilizers, pesticides, and herbicides can generate stormwater pollution. Water quality concerns resulting from stormwater pollution include cadmium, lead, zinc, copper, and mercury (San Francisco Bay RWQCB 2021).

Groundwater

The DWR defines state groundwater basins based on geologic and hydrogeologic conditions. The Project area overlies the Santa Clara Valley groundwater basin. The Santa Clara Subbasin lies within a structural depression aligned with the northwest-trending Coast Ranges and is bordered by the Diablo Range to the west and the Santa Cruz Mountains to the east. The subbasin stretches from the northern edge of Santa Clara County down to the groundwater divide near Morgan Hill (DWR 2004). The broader Santa Clara Basin is comprised of two subbasins: the Santa Clara and Llagas subbasins, together encompassing an area of roughly 385 square miles. Due to variations in land use and resource management, the Santa Clara Subbasin is further segmented into two management zones: the Santa Clara Plain and the Coyote Valley. The principal geohydrologic feature is the Santa Clara Valley, which drains northward into the San Francisco Bay via tributaries such as Coyote Creek, the Guadalupe River, and Los Gatos Creek. The DWR considers the Santa Clara Subbasin (DWR Groundwater Basin No. 2-009.02) an important and beneficial groundwater basin underlying the Santa Clara Valley. There are two key waterways within the City of Mountain View, Stevens Creek and Permanente Creek, which flow from the Santa Cruz Mountains toward the Bay (City of Mountain View 2021).

Water Supply

Potable water supply for the City of Mountain View is provided from three sources: the San Francisco Public Utilities Commission (SFPUC), Santa Clara Valley Water District (SCVWD), and local groundwater wells. Approximately 89 percent of the city's drinking water is sourced from the SFPUC Regional Water System. SFPUC water supply portfolio includes multiple supply sources, including the Hetch Hetchy Reservoir (Tuolumne River), local surface reservoirs of the Alameda Peninsula Watersheds, and Los Vaqueros Reservoir (City of Mountain View 2025a).

Roughly nine percent of the City's drinking water is sourced from Valley Water which manages a diverse water supply portfolio, including groundwater, local surface water, imported water, and recycled water. Surface water is imported mainly from the South Bay Aqueduct, Dyer Reservoir, Lake Del Valle, and San Luis Reservoir, which all draw water from the Sacramento-San Joaquin Delta watershed. Calero Reservoir is Valley Water's local water source. Imported water includes Valley Water's State Water Project and Central Valley Project contract supplies, and supplies delivered by the SFPUC to cities in northern Santa Clara County. Valley Water supplies are distributed to recharge facilities in the Santa Clara and Llagas subbasins, drinking water treatment plants, local creeks for environmental needs, or directly to water users. Valley Water's three water treatment plants provide multiple barriers for physical removal of contaminants and disinfection of pathogens. Mountain View receives water from the Rinconada Water Treatment Plant in Los Gatos (City of Mountain View 2025a).

The City of Mountain View owns and operates groundwater wells that contribute approximately two percent of its potable water supply. However, the City maintains groundwater well capacity exceeding typical annual use. Historically, groundwater supplied up to 25 percent of the City's potable water demand, and the City's existing well capacity is now more than twenty times greater than its normal annual groundwater use (City of Mountain View 2020). Local groundwater is found in two aquifers within the Santa Clara Subbasin, separated by natural clay layers. City wells produce water from the lower, confined aquifer. This groundwater is blended with water from SFPUC before being distributed to City water customers. Additionally, the wells serve as an emergency backup water source (City of Mountain View 2025a).

In addition, the City of Mountain View has a Water Shortage Contingency Plan which provides a flexible structure of response actions to address potential water supply shortages. The plan was developed based on key principles: shared responsibility, ensuring basic health and safety needs, prioritizing reductions in nonessential water use, minimizing economic impacts to businesses, and maintaining clear communication throughout. The current plan outlines four stages of response (Stages 1 through 4) to address varying levels of water shortage (City of Mountain View 2021).

Flooding and Inundation

Flooding during storm events occurs when the amount of rainfall exceeds the infiltration capacity of the surrounding landscape or the conveyance capacity of the stormwater drainage system. The Federal Emergency Management Agency (FEMA) delineates regional flooding hazards on Flood Insurance Rate Maps as part of the National Flood Insurance Program. Zones with higher flood risk are called Special Flood Hazard Areas; these areas have a 1 percent chance or greater of flooding in a given year (also called the 100-year floodplain). Areas that have a 0.2 percent chance of flooding in a given year are called the 500-year floodplain. According to FEMA flood zone mapping, the majority of the Project area is designated as Zone X, which indicates an area of minimal flood hazard, with areas adjacent to the San Francisco Bay at the outermost edges of Mountain View and the creeks that transect the city are designated Zone VE, a special flood hazard area with a 1 percent annual chance of fooding. Areas in the eastern and western portions of the city are designated as Zone X, an area with reduced flood risk due to levee, which indicates an area where the risk of flooding is lower than the risk inside a special flood hazard area (FEMA 2025a; FEMA 2025b; Flood Insurance Rate Map Nos. 06085C0036H, 06085C0037H, 06085C0038H, 06085C0039, 06085C0202H, and 06085C0045H). Levees such as those located within the Charleston Slough, ponds within the city, and along Stevens Creek protect the city from 100-year flood events (City of Mountain View 2021). Accordingly, the identified Change Areas have a very low risk of flooding as shown in Figure 4.8-1.

Tsunamis and seiches are two types of water waves that are generated by earthquake events. Tsunamis are broad-wavelength ocean waves, and seiches are standing waves within confined bodies of water, typically reservoirs. According to the California Tsunami Maps published by the California Department of Conservation and as shown on Figure 4.8-2, there are portions of the perimeter of Mountain View in the Coastal Zone that are within a Tsunami Hazard Area; however, inland Mountain View is not within a Tsunami Hazard Area (California Department of Conservation 2024). Mountain View is served by the U.S. Tsunami Warning System, which includes the National Tsunami Warning Center in Alaska and the Pacific Tsunami Warning Center in Hawaii. These centers monitor seismic activity and issue tsunami alerts to the National Weather Service, which then disseminates warnings to local emergency management agencies, including Santa Clara County Office of Emergency Services

Due to the absence of large inland bodies of water within or upslope of the Project area, the Project area is not subject to inundation from seiche.

The closest dam to the Project area is Stevens Creek Dam, located approximately 3 miles southwest of the Mountain View city limits. According to the DWR Dam Breach Inundation Map Web Publisher, the Project area is not subject to inundation in the event of a dam failure (DWR 2024b).

Figure 4.8-1 FEMA Flood Zone Areas in Mountain View

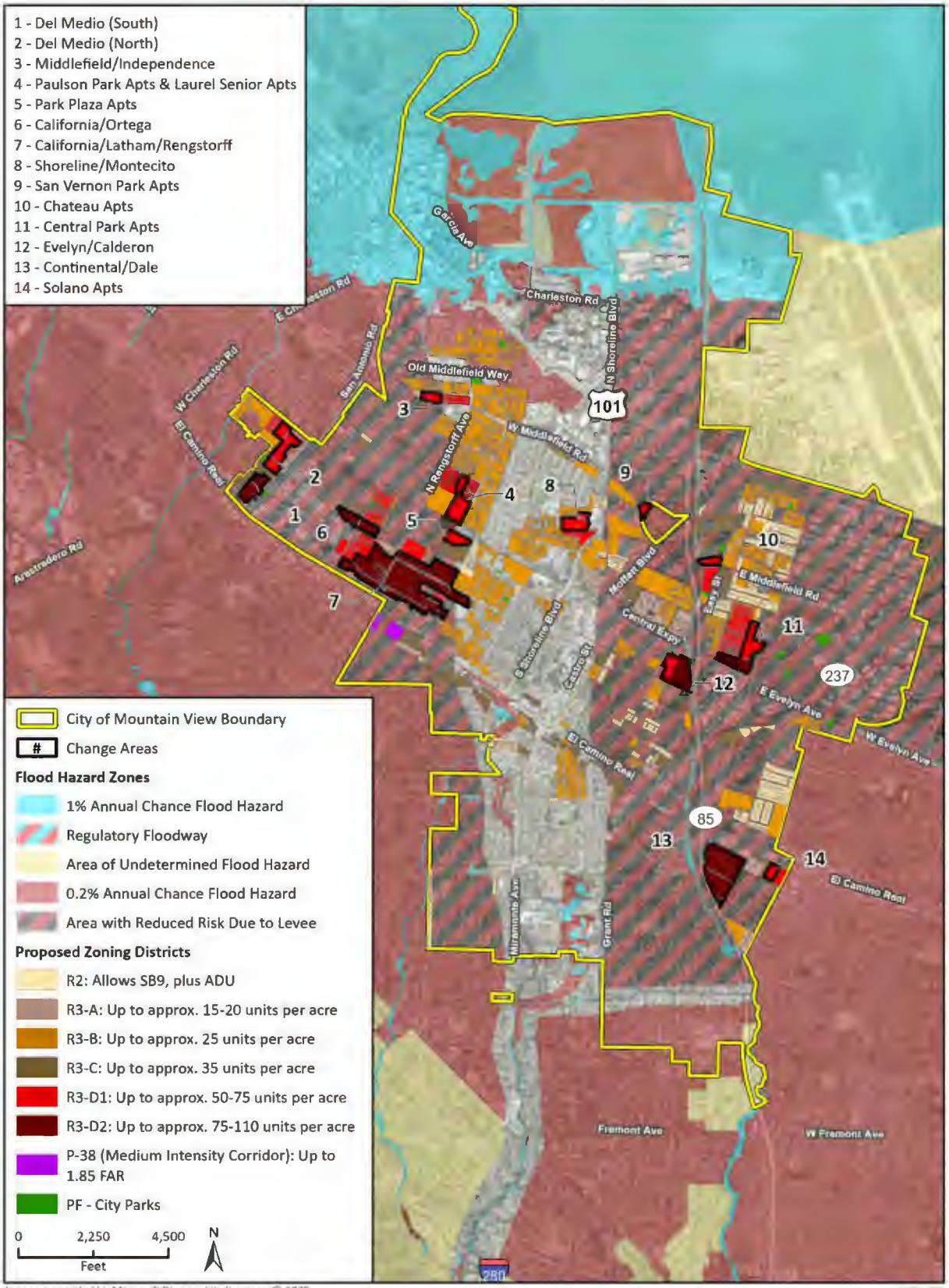
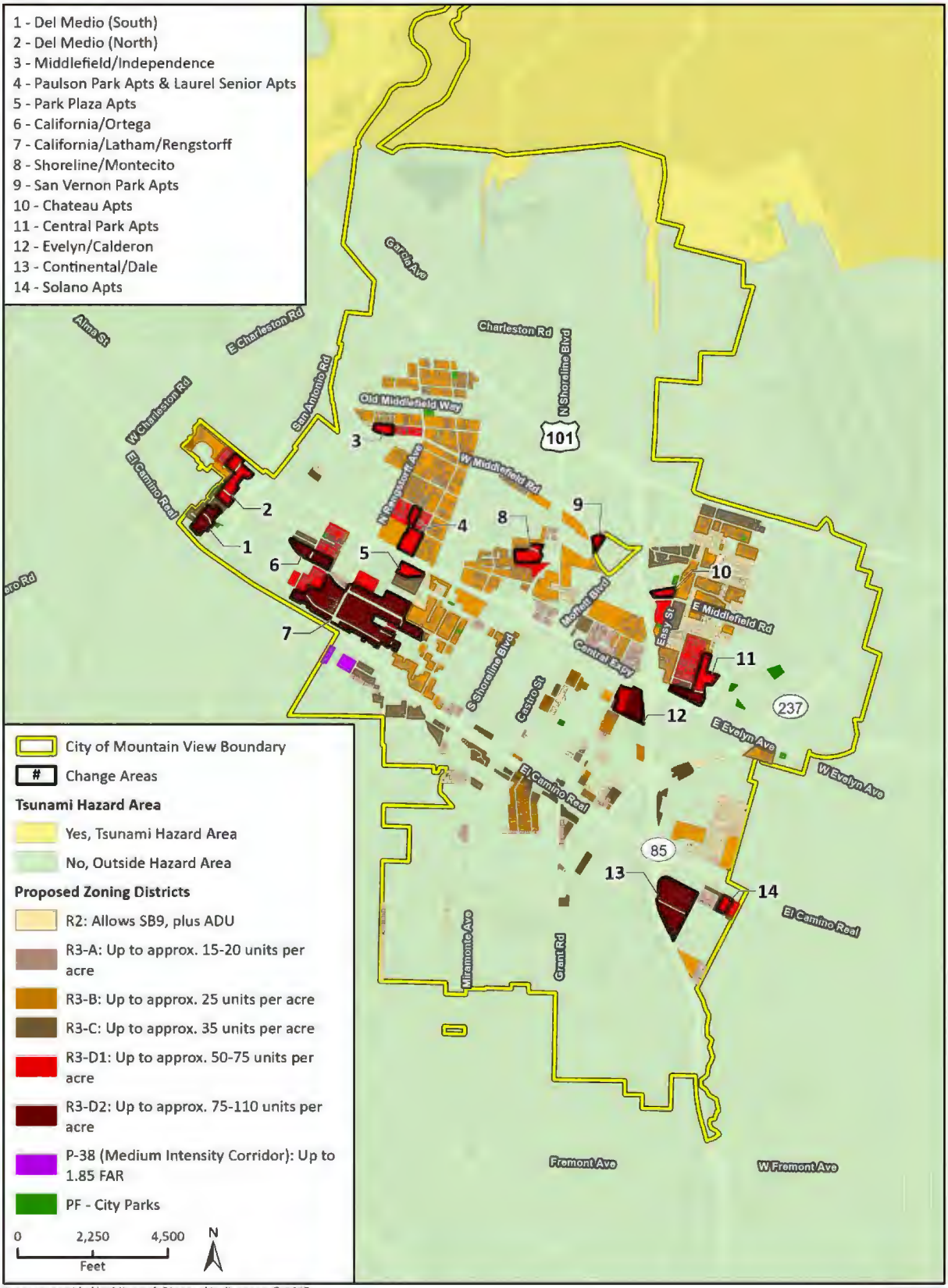


Figure 4.8-2 Tsunami Hazard Areas in Mountain View



Sea Level Rise

As a result of the Supreme Court decision regarding the assessment of the environment's impacts on projects (*California Building Industry Association [CBIA]* v. *Bay Area Air Quality Management District [BAAQMD],* 62 Cal. 4th 369 [No. S 213478] issued December 17, 2015), evaluation of impacts related to existing environmental conditions on a proposed project is generally not considered to be within the purview of the CEQA process. Accordingly, this discussion of sea level rise is provided solely for informational purposes.

Flood potential could increase in Mountain View due to sea level rise. Although sea levels have generally not risen enough to pose a substantial risk of flooding to Mountain View, future sea level rise may be great enough to exacerbate existing flooding and erosion. The *Shoreline Sea Level Rise Study Update* prepared by the City of Mountain View in June 2022, is intended to inform Mountain View's Shoreline Community of shoreline management strategies for future sea level rise. The Bay could rise between 23 and 42 inches by 2070, flooding a portion of northern Mountain View (City of Mountain View 2022).

Based on the *Shoreline Sea Level Rise Study Update,* the *Climate Change Vulnerability Assessment*, and the National Oceanic and Atmospheric Administration's Sea Level Rise Viewer, identified Change Areas are not subject to inundation due to sea level rise (National Oceanic and Atmospheric Administration 2024).

4.8.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The Federal Water Pollution Control Act of 1948 was the first major law to address water pollution in the United States. In 1972, the Federal Water Pollution Control Act was amended and became known as the Clean Water Act (CWA). The CWA established the basic structure for regulating discharges of pollutants into the waters of the United States. The CWA gave the United States Environmental Protection Agency (USEPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the CWA is administered by USEPA and United States Army Corps of Engineers (USACE).

The federal CWA places the primary responsibility for the control of water pollution and for the planning of development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs. At the state and regional levels in California, the CWA is enforced by the SWRCB and the nine RWQCBs.

Section 401: Water Quality Certification

Under Section 401 of the CWA, the RWQCBs have regulatory authority over actions in waters of the United States and/or the State of California through the issuance of water quality certifications, which are issued in conjunction with a federal permit (e.g., permits issued by the USACE under Section 404 of the CWA, described below). Section 401 of the CWA provides the SWRCB and the RWQCBs with the regulatory authority to waive, certify, or deny a proposed activity that could result

in a discharge to surface waters of the state. To waive or certify an activity, these agencies must find that the proposed discharge would comply with state water quality standards, including those protecting beneficial uses and water quality. If these agencies deny the proposed activity, the federal permit cannot be issued. This water quality certification is generally required for projects involving the discharge of dredge or fill material to wetlands or other bodies.

Section 402: National Pollutant Elimination System

Section 402 of the CWA establishes the National Pollutant Elimination System (NPDES) regulations for stormwater and other pollutant discharges. Section 402 prohibits discharge of pollutants to waters of the United States unless they are regulated by an NPDES permit. Stormwater discharges are regulated under a variety of NPDES permits, including municipal, agricultural, industrial, construction, and low-threat discharge permits.

In 1987, Congress amended the CWA to require the implementation of a two-phased program to address stormwater discharges. Phase I of the NPDES program, promulgated by USEPA in November 1990, requires NPDES permits for stormwater discharges from municipal separate storm sewer systems (MS4s)[1] serving populations of 100,000 or greater, construction sites disturbing greater than five acres of land, and 10 categories of industrial activities.

In California, the NPDES program is administered by SWRCB through the nine RWQCBs. Further discussion of the NPDES program and permits in California relevant to the Project are provided in discussion of state and local regulations, below.

Section 404: Discharge of Dredge or Fill

Section 404 of the CWA requires a permit be issued by USACE before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulations (e.g. farming activities, maintenance activities, construction of temporary sedimentation basins, construction and maintenance of forest roads or temporary mining roads). Waters of the United States generally include tidal waters, lakes, ponds, rivers, streams (including intermittent streams), and wetlands (with the exception of isolated wetlands).

Section 303(d)

Section 303(d) of the CWA requires states to identify water bodies that do not meet water quality objectives and are not supporting their beneficial uses. Each state must submit an updated biennial list, called the 303(d) list, to USEPA. In addition to identifying the water bodies that are not supporting beneficial uses, the list also identifies the pollutant or stressor causing impairment and establishes a priority for developing a control plan to address the impairment. If a water body is designated as "impaired," then a total maximum daily load is developed and identified for the affected water body. A total maximum daily load establishes the maximum daily amount of a pollutant allowed in an identified water body and is used as a planning tool in addressing water quality impairments and improving water quality.

[1] An MS4 is a conveyance or system of conveyances designed or used to collect or convey stormwater (e.g., storm drains, pipes, ditches) that are owned by a state, city, town, or other public entity.

b. State Regulations

Porter-Cologne Water Quality Control Act of 1970

California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the SWRCB and the nine RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of the CWA in California. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, regulate discharges to surface water and groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of a hazardous substance, sewage, oil, or petroleum product. Each RWQCB must adopt and implement a Water Quality Control Plan for its region in conformance with the policies set forth in the Porter-Cologne Act.

California Toxics Rule

In May 2000, USEPA promulgated the California Toxics Rule, which established numeric water quality criteria for toxic pollutants for waters in California. The California Toxics Rule provides water quality criteria for certain potentially toxic compounds for inland surface waters, enclosed bays, estuaries, and waters designated for human health or aquatic life uses. The California Toxics Rule is often used by the RWQCBs when establishing water quality objectives and total maximum daily loads of pollutants. Although the California Toxics Rule criteria do not apply directly to discharges of stormwater runoff, they are utilized as benchmarks for toxics in urban runoff and to evaluate the potential ecological impacts of stormwater runoff to receiving waters.

Antidegradation Policy

The State Antidegradation Policy (Resolution No. 68-16) was adopted by SWRCB in 1968 to protect surface water and groundwater from degradation. The Antidegradation Policy applies to the disposal of waste to high-quality surface water and groundwater. The Antidegradation Policy requires the water quality of these water bodies be maintained unless SWRCB finds the change will be consistent with maximum benefit to the people of the state, will not unreasonably affect present and anticipated beneficial uses of the waters, and will not result in water quality less than that prescribed in policies regulating water quality. The Antidegradation Policy also requires the best practicable treatment or control of discharges to high-quality waters to assure pollution or nuisance will not occur and the highest possible water quality will be maintained.

Phase I Municipal Stormwater Permit

The federal Clean Water Act (CWA) was amended in 1987 to address urban stormwater runoff pollution of the nation's waters. In 1990, US EPA promulgated rules establishing Phase 1 of the National Pollutant Discharge Elimination System (NPDES) stormwater program. The Phase 1 program for Municipal Separate Storm Sewer System (MS4s) requires operators that serve populations of 100,000 or greater to implement a stormwater management program to control polluted discharges from these MS4s. The Water Board issued county-wide municipal stormwater permits in the early 1990s to operators of MS4s serving populations over 100,000 (Phase 1). On October 14, 2009, the Water Board re-issued these county-wide municipal stormwater permits as one Municipal Regional Stormwater NPDES Permit to regulate stormwater discharges from municipalities and local agencies in Alameda, Contra Costa, San Mateo, and Santa Clara counties,

and the cities of Fairfield, Suisun City, and Vallejo. The Phase I MS4 Permit requires permittees to develop a stormwater management program and individual dischargers to develop and implement Stormwater Management Plans.

Construction Stormwater General Permit

The *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction Stormwater General Permit), adopted by SWRCB, regulates construction activities that include clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area. The Construction Stormwater General Permit authorizes the discharge of stormwater to surface waters from construction activities and requires all developers of land where construction activities will occur over more than one acre to do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the Construction Stormwater General Permit;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States;
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies construction Best Management Practices (BMPs) that will reduce pollution in stormwater discharges to the Best Available Technology/Economically Achievable/Best Conventional Pollutant Control Technology standards;
- Perform inspections and maintenance of all BMPs; and
- Conduct stormwater sampling, if required based on risk level.

To obtain coverage under the Construction Stormwater General Permit, a project applicant must electronically file all permit registration documents with SWRCB prior to the start of construction. Permit registration documents must include a Notice of Intent, Risk Assessment, site map, SWPPP, annual fee, and signed certification statement.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, control discharges from groundwater dewatering, and control pollutants from construction materials. The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

The Construction Stormwater General Permit also includes groundwater dewatering requirements for projects not covered under a De Minimis or Low Threat Discharge Permit. The dewatering requirements mandate dischargers to implement BMPs to control the volume and velocity of dewatering discharges. The Construction Stormwater General Permit also requires testing and treatment, if necessary, of groundwater discharge to verify the discharge meets or exceeds the effluent limitations specified in the permit.

Urban Water Management Planning Act

In 1983 the California Legislature enacted the Urban Water Management Planning Act (Water Code Section 10610–10656). The Act states that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 acre-feet annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The Act requires that urban water suppliers adopt an urban water management plan (UWMP) at least once every five

years and submit them to the DWR. Noncompliant urban water suppliers are ineligible to receive funding pursuant to Division 24, commencing with Section 78500, or Division 26, commencing with Section 79000, or receive drought assistance from the state until the UWMP is submitted and deemed complete pursuant to the Urban Water Management Planning Act. The City of Mountain View UWMP would apply to the Project area.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) of 2014 is a comprehensive three-bill package signed into California state law in September 2014. SGMA provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for state intervention if necessary to protect the resource. SGMA requires that medium- and high-priority groundwater basins, as defined by DWR, are managed by local Groundwater Sustainability Agencies (GSAs) through implementation of Groundwater Sustainability Plans (GSPs) designed to achieve and maintain sustainable conditions. DWR has identified the Santa Clara and Llagas subbasins as high-priority basins and are not critically overdrafted basins. SGMA lists Valley Water as one of 18 exclusive agencies with powers to comply with SGMA within its statutory boundary. In May 2016, following a public hearing, the District Board of Directors adopted a resolution to become the GSA for the Santa Clara and Llagas subbasins. Prior to the statutory deadline of January 1, 2017, Valley Water submitted the 2016 GWMP for both the Santa Clara and Llagas subbasins to DWR as an Alternative Plan. The 2016 GWMP updated technical information from Valley Water's 2012 GWMP with information functionally equivalent to elements required by Articles 5 and 7 of the GSP Emergency Regulations. The 2016 GWMP met the requirements of California Water Code (Water Code) Section 10733.6, which allows for an Alternative Plan to be submitted to DWR. The 2016 GWMP, prepared pursuant to the District Act, qualified as an Alternative Plan per Water Code Section 10733.6(b)(1), which states that an Alternative Plan can be a plan developed pursuant to other law authorizing groundwater management. This 2021 GWMP is also prepared pursuant to the District Act.

c. Local Regulations

San Francisco Bay Water Quality Control Plan (Basin Plan)

The San Francisco Bay RWQCB has adopted a Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan; San Francisco RWQCB 2021) that governs water quality planning and regulation throughout the region, including the City of Mountain View. The Basin Plan delineates water resource area boundaries based on hydrological features and serves as the master policy document for protecting and enhancing water quality in the region. For the purposes of achieving and maintaining water quality protection, the Basin Plan identifies beneficial uses for each surface water body and groundwater basin. These beneficial uses include, but are not limited to, municipal and domestic supply, water contact recreation, non-contact recreation, warm freshwater habitat, cold freshwater habitat, wildlife habitat, and fish migration and spawning. Once beneficial uses are designated, the Basin Plan establishes water quality objectives to protect those uses and implements programs to maintain or enhance water quality.

The Basin Plan establishes implementation programs to achieve water quality objectives and requires monitoring and assessment to evaluate the effectiveness of these programs. These objectives and programs must comply with the State Antidegradation Policy (SWRCB Resolution No.

68-16), which is designed to maintain high-quality waters while allowing flexibility for development, provided that beneficial uses are not unreasonably affected.

Santa Clara Valley Urban Runoff Pollution Prevention Program

The City of Mountain View, along with the County of Santa Clara and 14 other cities, is a participating member of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP). Participating members collaborate on regional projects and permit-related activities to fulfill the requirements of the Municipal Regional Stormwater NPDES Permit (Order No. R2-2022-0018, NPDES No. CAS612008). The SCVURPPP and member agencies implement pollution prevention, source control, monitoring and outreach programs aimed at reducing pollution in stormwater runoff, protecting water quality and beneficial uses of San Francisco Bay and Santa Clara Valley creeks and rivers.

City of Mountain View Stormwater Requirements

The City of Mountain View enforces the following requirements for new and redevelopment projects within its jurisdiction, as required by the NPDES Permit No. R2-2022-0018 issued by the SWRCB. These requirements are implemented through the SCVURPPP and the City's Fire Department:

- Small projects and detached single-family projects creating or replacing 2,500 to 5,000 square feet of impervious surface must incorporate site design measures, source control measures, and stormwater treatment measures
- Redevelopment projects that replace or alter less than 50 percent of the existing impervious surface must treat stormwater runoff only from the portion of the site that is redeveloped.
- Redevelopment projects that replace or alter 50 percent or more of the existing impervious surface are required to treat runoff from the entire site

Projects that would install 2,500 square feet or more impervious surface must implement site design measures, such as minimizing impervious areas, preserving natural drainage features, and using permeable surfaces. Projects that would install 5,000 net square feet of impervious surface (or 10,000 net square feet for detached single-family homes) must treat runoff from the 85th percentile, 24-hour storm event. Projects that would install 10,000 square feet or more of impervious surface must retain stormwater from the 85th or 95th percentile, 24-hour storm event, depending on site conditions and to prevent hydromodification impacts.

City of Mountain View City Code

Chapter 35 of the Mountain View City Code establishes standards for stormwater management and discharge control. Section 35.33 and 35.34 requires the implementation of Best Management Practices (BMPs) for construction and development activities to control the volume, rate, and pollutant load of stormwater runoff from new development and redevelopment projects. These BMPs are designed to minimize the generation, transport, and discharge of pollutants into the storm drain system and local creeks that ultimately flow into the San Francisco Bay. The City of Mountain View incorporates BMP requirements into land use entitlements, construction permits, and building permits. Developers and property owners are required to comply with all terms and conditions of these permits, including both structural and nonstructural BMPs. Long-term operation and maintenance of these BMPs is enforced through inspections and right-of-entry provisions granted to City staff.

Section 35.33 of the City Code authorizes the Fire Chief of the Fire Department to mandate remediation when a discharge of pollutants has occurred that may result in pollution of stormwater, the storm drain system, or waters of the United States. If a violation is suspected, the City may issue a stop work order until the pollution is remediated to the satisfaction of the City. These local protections align with the San Francisco Bay RWCB Municipal Regional Stormwater NPDES Permit Order No. R2-2022-0018, NPDES No. CAS612008 (refer to *Phase I Municipal Stormwater Permit*, above). Chapter 36 of the Mountain View City Code includes the City's Zoning Code. Therein, Chapter 36 Article XI, Landscaping, provides for the conservation of water resources through water efficient landscaping and irrigation requirements. Chapter 36 is supplemented by the City's Water Conservation in Landscaping Regulations as adopted in 2010 and amended in 2016, which applies to any development where 500 square feet or more of new or modified landscaping is proposed. The Water Conservation in Landscaping Regulations require applicants of such projects to demonstrate water efficiency in landscaping by either omitting high-water-use plants and ensuring that at least 80 percent of the total landscape area includes native or low-water-use plants, or by preparing a Water Budget Calculation pursuant to Chapter 10 of the Water Conservation in Landscaping Regulations (

In addition, Mountain View has adopted the 2025 California Green Building Code standards with local amendments, including CALGreen (Title 24, Part 11). Under the City's local amendments to CALGreen, projects that disturb one acre or more must obtain coverage under the State Construction General Permit and must submit a Notice of Intent and a Stormwater Pollution Prevention Plan (SWPPP) to the State, with proof of coverage provided to the City, before project applicants are eligible to receive demolition or grading permits from the City. For projects that disturb less than one acre, applicants must implement a stormwater sediment and erosion control plan with BMPs. Additionally, certain projects must implement postconstruction stormwater controls as required by Provision C.3 of the Municipal Regional Stormwater NPDES Permit and Mountain View City Code Section 35.32.3.

Mountain View 2030 General Plan

The Mountain View 2030 General Plan is the guiding document for the City's physical development and preservation. The Infrastructure and Conservation and Parks, Open Space, and Community Facilities Elements of the General Plan include the following policies related to hydrology and water quality:

Goal INC-3: Functional, safe and well-maintained public rights-of-way that promote environmental sustainability.

> **Policy INC-3.3: Street Design for Stormwater.** Encourage street designs that reduce stormwater flows and accomplish other City stormwater goals.
>
> **Policy INC-3.7: Recycled Water Separation.** Ensure that expansion of recycled water infrastructure in the public right-of-way with other utilities adheres to separation criteria provided by the California Department of Public Health.

Goal INC-4: A sustainable water supply with sufficient supply and appropriate demand management.

> **Policy INC-4.1: Water Supply.** Maintain a reliable water supply.

Policy INC-4.2: Participating in Regional Organizations. Participate in regional water supply organizations, support their efforts to maintain and improve the water supply and monitor statewide and regional water supplies.

Policy INC-4.4: Expanding Water Service Area. Provide water service to areas outside the City service area if it is mutually beneficial for the City and prospective new users.

Goal INC-5: Effective and comprehensive programs utilizing water use efficiency, water conservation and alternative water supplies to reduce per capita potable water use.

Policy INC-5.1: Community Awareness. Raise community awareness about water use efficiency and water conservation.

Policy INC-5.2: Citywide Water Conservation. Reduce water waste and implement water conservation and efficiency measures throughout the city.

Policy INC-5.3: Water Reuse. Remove barriers and provide guidance for the use of rainwater and graywater as alternative water supplies.

Policy INC-5.4: Smart Water Meters. Encourage water meter technologies that provide water usage feedback to customers.

Policy INC-5.5: Landscape Efficiency. Promote water-efficient landscaping including drought-tolerant and native plants, along with efficient irrigation techniques.

Policy INC-5.6: Indoor Efficiency. Promote the use of water-efficient fixtures and appliances.

Policy INC-5.7: Leadership in City Facilities. Provide leadership by promoting water use efficiency, water conservation and the use of recycled water at City-owned facilities.

Goal INC-6: A coordinated wastewater collection system that protects the community's health and safety.

Policy INC-6.1: Citywide Wastewater. Ensure high-quality wastewater collection services and a well-maintained wastewater system.

Policy INC-6.2: Pollution Source Control. Implement an effective and comprehensive industrial pretreatment program and industrial, commercial and residential pollution source control programs.

Policy INC-6.3: Wastewater Treatment Partnership. Partner with the Palo Alto Regional Water Quality Control Plant to ensure high-quality water treatment.

Policy INC-6.4: Discharge Regulations. Coordinate with partners and other local agencies to monitor changing rules and regulations regarding wastewater discharge from the Palo Alto Regional Water Quality Control Plant

Goal INC-7: A reliable, safe and extensive recycled water infrastructure system.

Policy INC-7.1: Citywide Recycled Water Use. Promote, require or offer incentives for using recycled water as an alternative to potable water

Policy INC-7.2: Recycled Water System. Expand the use and availability of recycled water throughout the city.

Policy INC-7.3: Recycled Water in Parks. Promote the use of recycled water at City parks and open spaces or where available.

Policy INC-7.4: Recycled Water and Trees. Promote appropriate tree and landscape species irrigated by recycled water.

Policy INC-7.5: Rights-of-way and Infrastructure. Design public right-of-way to accommodate recycled water infrastructure.

Goal INC-8: An effective and innovative stormwater drainage system that protects properties from flooding and minimizes adverse environmental impacts from stormwater runoff.

Policy INC-8.1: Citywide Stormwater System. Maintain the stormwater system in good condition.

Policy INC-8.2: National Pollutant Discharge Elimination System Permit. Comply with requirements in the Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit (MRP).

Policy INC-8.3: Cost-effective Strategies. Encourage stormwater strategies that minimize additional City administrative and maintenance costs.

Policy INC-8.4: Runoff Pollution Prevention. Reduce the amount of stormwater runoff and stormwater pollution entering creeks, water channels and the San Francisco Bay through participation in the Santa Clara Valley Urban Runoff Pollution Prevention Program.

Policy INC-8.5: Site-specific Stormwater Treatment. Require post-construction stormwater treatment controls consistent with MRP requirements for both new development and redevelopment projects.

Policy INC-8.6 Green Streets. Seek opportunities to develop green streets and sustainable streetscapes that minimize stormwater runoff, using techniques such as on street bio-swales, bio-retention, permeable pavement or other innovative approaches.

Policy INC-8.7: Stormwater Quality. Improve the water quality of stormwater and reduce flow quantities.

Policy INC-8.8: Stormwater Infrastructure Funding. Develop permanent and ad hoc sources of funding to implement stormwater best practices in the city.

Goal INC-16: Rich and biologically diverse ecological resources which are protected and enhanced.

Policy INC-16.5: Wetland Habitat. Collaborate with and support regional efforts to restore and protect wetlands, creeks, tidal marshes and open-water habitats adjacent to San Francisco Bay.

Goal INC-17: A healthy and well-managed watershed that contributes to improved water quality and natural resource protection.

Policy INC-17.1: Flood Prevention. Provide and maintain City infrastructure to reduce localized flooding and protect community health and safety.

Policy INC-17.2: Natural Hydrology in Watersheds. Promote an ecologically sensitive approach to flood protection, encouraging natural hydrology and preserving habitat and ecology within watercourses.

Policy INC-17.3: Floodway Preservation. Preserve floodways as a natural flood control mechanism.

Policy INC-17.4: National Flood Insurance Program. Participate in the National Flood Insurance Program administered by the Federal Emergency Management Administration.

Goal INC-18: Prevention and remediation of contamination in groundwater, surface water, soil and from soil vapor and vapor intrusion.

Policy INC-18.1: Contamination Prevention. Protect human and environmental health from environmental contamination.

Policy INC-18.2: Contamination Clean-Up. Cooperate with local, state and federal agencies that oversee environmental contamination and clean-up.

Goal POS-12: A healthy urban forest and sustainable landscaping throughout the city.

Policy POS-12.4: Drought-tolerant Landscaping. Increase water-efficient, drought tolerant and native landscaping where appropriate on public and private property.

Policy POS-12.5: Salt-tolerant Vegetation. Promote the use of salt-tolerant vegetation that can use recycled water.

Mountain View Standard Conditions of Approval

As part of discretionary review, the City has standard conditions for different types of approvals. The standard conditions of approval related to hydrology and water quality include the following:

State Of California Construction General Stormwater Permit

A "Notice of Intent" (NOI) and "Stormwater Pollution Prevention Plan" (SWPPP) shall be prepared for construction projects disturbing one (1) acre or more of land. Proof of coverage under the State General Construction Activity Stormwater Permit shall be attached to the building plans.

Construction Best Management Practices

All construction projects shall be conducted in a manner which prevents the release of hazardous materials, hazardous waste, polluted water, and sediments to the storm drain system.

Construction Sediment and Erosion Control Plan

The applicant shall submit a written plan acceptable to the City which shows controls that will be used at the site to minimize sediment runoff and erosion during storm events. The plan should include installation of the following items where appropriate: (a) silt fences around the site perimeter; (b) gravel bags surrounding catch basins; (c) filter fabric over catch basins; (d) covering of exposed stockpiles; (e) concrete washout areas; (f) stabilized rock/gravel driveways at points of egress from the site; and (g) vegetation, hydroseeding, or other soil stabilization methods for high-erosion.

Landscape Design

Landscape design shall minimize runoff and promote surface filtration. Examples include: (a) no steep slopes exceeding 10%; (b) using mulches in planter areas without ground cover to avoid sedimentation runoff; (c) installing plants with low water requirements; and (d) installing

appropriate plants for the location in accordance with appropriate climate zones. Identify which practices will be used in the building plan submittal.

Efficient Irrigation

Common areas shall employ efficient irrigation to avoid excess irrigation runoff. Examples include: (a) setting irrigation timers to avoid runoff by splitting irrigations into several short cycles; (b) employing multi-programmable irrigation controllers; (c) employing rain shutoff devices to prevent irrigation after significant precipitation; (d) use of drip irrigation for all planter areas which have a shrub density that will cause excessive spray interference of an overhead system; and (e) use of flow reducers to mitigate broken heads next to sidewalks.

Parking Garages

For multiple-level parking garages, interior levels shall be connected to an approved wastewater treatment system discharging to the sanitary sewer.

Outdoor Storage Areas (Including Garbage Enclosures)

Outdoor storage areas (for storage of equipment or materials which could decompose, disintegrate, leak, or otherwise contaminate stormwater runoff), including garbage enclosures, shall be designed to prevent the run-on of stormwater and runoff of spills by all of the following: (a) paving the area with concrete or other nonpermeable surface; (b) covering the area; and (c) sloping the area inward (negative slope) or installing a berm or curb around its perimeter. There shall be no storm drains in the outdoor storage area.

Stormwater Treatment (C.3)

This project will create or replace more than ten thousand (10,000) square feet of impervious surface; therefore, stormwater runoff shall be directed to approved permanent treatment controls as described in the City's guidance document entitled, "Stormwater Quality Guidelines for Development Projects." The City's guidelines also describe the requirement to select Low-Impact Development (LID) types of stormwater treatment controls; the types of projects that are exempt from this requirement; and the Infeasibility and Special Projects exemptions from the LID requirement.

The "Stormwater Quality Guidelines for Development Projects" document requires applicants to submit a Stormwater Management Plan, including information such as the type, location, and sizing calculations of the treatment controls that will be installed. Include three stamped and signed copies of the Final Stormwater Management Plan with the building plan submittal. The Stormwater Management Plan must include a stamped and signed certification by a qualified Engineer, stating that the Stormwater Management Plan complies with the City's guidelines and the State NPDES Permit. Stormwater treatment controls required under this condition may be required to enter into a formal recorded Maintenance Agreement with the City.

Hydromodification Management

Postconstruction stormwater runoff shall drain to approved permanent Hydromodification Management (HM) controls to mitigate increases in peak runoff flow and increased runoff volume. Projects that will decrease impervious surface area in comparison to the preproject condition are not subject to the HM requirement. Information related to this requirement, including the exemption criteria, is included in the City's document entitled, "Hydromodification Management

Plan Guidelines for Development Projects," and the Santa Clara Valley Urban Runoff Pollution Prevention Program's manual entitled, "C.3 Stormwater Handbook: Guidance for Implementing Stormwater Requirements for New and Redevelopment Projects."

The City's "Hydromodification Management Plan Guidelines for Development Projects" manual requires applicants to submit a Stormwater Management Plan, including information such as the type, location, and sizing requirements of the controls that will be installed. Include the Stormwater Management Plan with the building plan submittal. Property owners of projects that include stormwater controls constructed in accordance with this condition are required to enter into a formal recorded self-inspection and maintenance agreement with the City.

Stormwater Management Plan—Third-Party Engineer's Certification

The Final Stormwater Management Plan must be certified by a qualified third-party engineer that the proposed stormwater treatment controls comply with the City's Guidelines and Provision C.3 of the Municipal Regional Stormwater NPDES Permit (MRP). A list of qualified engineers is available at the following link: http://www.scvurppp-w2k.com/consultants_list.shtml.

Full Trash Capture

Projects located in "moderate," "high," or "very high" trash generating areas as outlined in the City's Long-Term Trash Load Reduction Plan that are undergoing site improvements shall install full trash capture protection within the existing storm drain system. Examples of full trash capture systems include large trash capture devices, such as hydrodynamic separators or media filtration systems, or small trash capture devices, such as storm drain catch basin connector pipe screens. Once installed, the property owner or property manager shall be responsible for maintaining the trash capture device. Maintenance shall be completed in accordance with the manufacturer's recommended frequency, but at a minimum of one time per year. Indicate the type of full trash capture device that will be installed to remove trash from runoff for the entire project site, and include details for the installation of the trash capture system(s) in the building plans for the project.

Full Trash Capture (Off-Site Improvement)

Projects located in "moderate," "high," or "very high" trash generating areas as outlined in the City's Long-Term Trash Load Reduction Plan that will construct off-site improvements to the public storm drain system shall install full trash capture protection within the newly constructed public storm drain system. Examples of full trash capture systems include large trash capture devices, such as hydrodynamic separators or media filtration systems, or small trash capture devices, such as storm drain catch basin connector pipe screens. Once installed, the property owner or property manager shall be responsible for maintaining the trash capture device. Maintenance shall be completed in accordance with the manufacturer's recommended frequency, but at a minimum of one time per year. Indicate the type of full trash capture device that will be installed to remove trash from runoff for the entire project site, and include details for the installation of the trash capture system(s) in the building plans for the project.

Grading Requirements

For sites located within a special flood hazard zone, the grading or site plan must show the elevation of the finished pad, lowest floor, highest adjacent grade for Flood Zone AO, and base flood elevation for Flood Zone AE. All elevations must be referenced to a City elevation benchmark. The benchmark number, description, elevation, and datum year shall be noted on the grading plan.

Geotechnical Report

The applicant shall have a design-level geotechnical investigation prepared which includes recommendations to address and mitigate geologic hazards in accordance with the specifications of California Geological Survey (CGS) Special Publication 117, *Guidelines for Evaluating and Mitigating Seismic Hazards*, and the requirements of the Seismic Hazards Mapping Act. The report will be submitted to the City during building plan check, and the recommendations made in the geotechnical report will be implemented as part of the project and included in building permit drawings and civil drawings as needed. Recommendations may include considerations for design of permanent below-grade walls to resist static lateral earth pressures, lateral pressures causes by seismic activity, and traffic loads; method for backdraining walls to prevent the build-up of hydrostatic pressure; considerations for design of excavation shoring system; excavation monitoring; and seismic design.

4.8.3 Impact Analysis

Methodology and Significance Thresholds

Methodology

The Project's impacts related to hydrology and water quality are evaluated based on the Project's adherence to local, state, and federal standards; the nature of proposed soil disturbance, construction activities, and groundwater dewatering during construction; changes in land use and proposed operational activities; changes in pre- and post-stormwater flows; and proposed operational BMPs for control of surface runoff and reduction of pollutants in stormwater runoff.

Significance Thresholds

To determine whether a project would result in a significant impact to Hydrology and Water Quality, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

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

5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Project Impacts

Threshold 1:	Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact HYD-1 THE PROJECT WOULD NOT VIOLATE WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS OR OTHERWISE SUBSTANTIALLY DEGRADE SURFACE OR GROUND WATER QUALITY. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

Development facilitated by the Project would require ground-disturbing activities during construction, which would disturb on-site soils. Soil disturbance would increase the potential for erosion and sedimentation. If construction activities occur during the rainy season, or in the event of heavy storms, soils could be eroded and transported off-site or to downstream receiving waters. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, fuels), and concrete-related waste may be spilled or leaked and have the potential to be transported off-site via stormwater runoff to off-site areas. This could result in potential impacts to water quality in local surface waters, including Stevens Creek, Permanente Creek, and the Bay, into which both creeks ultimately discharge. If development facilitated by the Project requires demolition of existing structures, such activities have the potential to release pollutants to on-site soils, particularly if on-site structures contain asbestos, lead, or polychlorinated biphenyls. Demolition activities have the potential to release these pollutants to on-site soils, where they could then be transported off site in stormwater runoff during storm events.

As described in Section 4.8.3, *Regulatory Setting*, construction projects that disturb one or more acres of ground disturbance, or less than one acre but would be part of a larger plan of development or sale, would be required to obtain coverage under the NPDES Construction General Permit. In compliance with these requirements, the SWPPP would specify BMPs to control the discharge of pollutants associated with demolition, including polychlorinated biphenyls, asbestos, and lead. In addition, the Construction Stormwater General Permit requires dischargers to prevent exposing demolition debris to precipitation, and mandates demolition materials to be covered with an impermeable barrier prior to precipitation to prevent known contaminants from being mobilized. Compliance with the Construction Stormwater General Permit, including implementation of the required SWPPP and construction BMPs, would minimize pollutant discharge to local waterways, including Stevens Creek and Permanente Creek, during construction activities on sites greater than one acre in size. Additionally, as described in Section 4.7, *Hazards and Hazardous Materials*, under Impact HAZ-1, regulatory requirements for demolition of structures that may contain asbestos, lead, and/or polychlorinated biphenyls would minimize the potential for hazardous materials releases from construction activities. Therefore, demolition activities would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Furthermore, Chapter 35 of the Mountain View City Code would apply to these projects, as it would with all development facilitated by the Project, regardless of acreage. Section 35.34 requires developers to implement BMPs for construction activities to control the volume, rate, and potential

pollutant load of stormwater runoff from new development and redevelopment projects to minimize the generation, transport, and discharge of pollutants. Under the City's local amendments to the 2025 CALGreen Code (Title 24, Part 11), projects disturbing one acre or more must obtain coverage under the State Construction General Permit, including submission of a Notice of Intent and a Stormwater Pollution Prevention Plan to the State, and proof of coverage must be provided to the City before demolition or grading permits are issued, while projects disturbing less than one acre must implement a stormwater sediment and erosion control plan with BMPs. In addition, postconstruction stormwater controls are required for certain projects as defined and described in Provision C.3 of the Municipal Regional Stormwater NPDES Permit, and Section 35.32.3 of the Mountain View City Code. These existing City requirements would ensure construction that disturbs less than one acre would minimize the pollution of stormwater.

While the Project overlays the Santa Clara groundwater basin, local areas of shallow or perched groundwater may be present and could be encountered during excavation activities. If groundwater is encountered during construction of development facilitated by the Project, dewatering of the work area would be required. Water removed from the work area may be discharged into the City's stormwater system as part of the dewatering process, and coverage under the Phase I MS4 Permit would be required. This would involve groundwater testing and treatment, as necessary, prior to its release into surface waters to prevent exceedances of effluent limitations. As a result, groundwater dewatering during excavation activities would not introduce pollutants to receiving waters or violate water quality standards or waste discharge requirements.

Compliance with the Construction Stormwater General Permit requirements and Mountain View Municipal Code requirements, as well as implementation of required construction BMPs pursuant to a SWPPP and/or the City, would minimize pollutant discharge in stormwater runoff. Therefore, construction of development facilitated by the Project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and impacts would be less than significant.

Operation

The Project would facilitate the development of higher density residential land uses across Mountain View. Pollutants associated with residential and commercial development include household garbage, household products, fertilizers, cleaning products, electronic waste, and food waste. Pollutants carried off site during storm events would be conveyed by the existing drainage infrastructure in the city, including gutters and storm drain infrastructure, which eventually drains to the South San Francisco Bay and could degrade the water quality.

Development facilitated by the Project would be required to comply with the Phase I MS4 Permit and City of Mountain View stormwater requirements. Development facilitated by the Project would be required to implement low impact development (LID) site design measures related to the creation or replacement of impervious surfaces, pursuant to City of Mountain View stormwater requirements that ensure compliance with NPDES Permit No. CAS612008, Order No. R2-2022-0018. These site design measures may include, but are not limited to, use of porous pavement, vegetated swales, green roofs, rain barrels and cisterns, tree planting, source control, runoff reduction, stormwater treatment, and hydromodification management (SFBRQCWB 2021). This includes the implementation of Source Control and LID BMPs. Source Control BMPs are preventative measures that are implemented to prevent the introduction of pollutants into stormwater. LID BMPs are implemented to mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, and detain runoff rather than allowing runoff to flow directly to piped or

impervious storm drains. LID BMPs must retain 85th percentile 24-hours storm event flows. BMPs target and reduce pollutants of concern from stormwater runoff from a site in compliance with the Phase I MS4 Permit and SCVURPPP stormwater requirements. Compliance with permit requirements, including incorporation of operational BMPs into Project design to target pollutants of concern, would minimize pollutant discharge during operation, thus reducing the potential for increased conveyance of pollutants into receiving water bodies, including Permanente Creek, Stevens Creek, and San Fransico Bay

Therefore, operation of future development facilitated by the Project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and the impact would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation measures are required.

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

Impact HYD-2 THE PROJECT WOULD NOT SUBSTANTIALLY DECREASE GROUNDWATER SUPPLIES OR INTERFERE SUBSTANTIALLY WITH GROUNDWATER RECHARGE SUCH THAT THE PROJECT MAY IMPEDE SUSTAINABLE GROUNDWATER MANAGEMENT OF THE BASIN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

Construction of future development facilitated by the Project would not include direct groundwater extraction. Water required for construction activities, such as dust control and concrete mixing, would be provided by the municipal water system, which relies on surface water and managed supplies rather than local aquifers. Construction water demand is temporary and relatively minor, and the Project would comply with applicable water conservation requirements and best management practices to minimize use. Groundwater may be encountered during geotechnical investigations and during construction that requires subsurface activities, which may result in the need for dewatering. Though dewatering may occur during construction of future development facilitated by the Project, project applicants would be required to coordinate with Valley Water regarding depths of excavation, as required by Valley Water (Valley Water 2021). Further, compliance with the Standard City Condition of Approval requiring preparation of a design-level geotechnical investigation would reduce impacts related to dewatering as project applicants would be required to implement design and engineering controls to minimize the volume and duration of dewatering activities, should they be necessary. Further, the City of Mountain View, including the Project area, lies entirely within the confined zone of the Santa Clara Groundwater Basin and is not located within a designated groundwater recharge area (Valley Water 2021). For these reasons, construction of the Proposed Project would not decrease groundwater supplies nor would it interfere with groundwater recharge and impacts would be less than significant.

Operation

As discussed in Section 4.8.1b, the Project area overlies the Santa Clara groundwater basin and is not located within a designated groundwater recharge area. The City receives water supplies from multiple sources including the SFPUC Regional Water System, Valley Water, City wells, and recycled

water. The main water source for Mountain View is the SFPUC which supplies 89 percent of the City's water supply. Water supply for future development facilitated by the Project would be primarily provided by SFPUC in accordance with regulatory permits and entitlements. Although the City of Mountain View receives water supply from Valley Water, this portion of the City's supply is used south of Cuesta Drive, an area where growth would not be facilitated by the R3 Zoning District Update. Water supply is further discussed in Section 4.15, *Utilities and Service Systems.* Based on the Utility Impact Study prepared by Schaaf & Wheeler (Appendix G), with the implementation of already planned water conservation measures, the gradual nature of development to be facilitated by the Project, the sufficient water supply from SFPUC and Valley Water, and strategies for conservation outlined by the City's Water Shortage Contingency Plan, the Proposed Project would not result in increased demand for groundwater supplies.

Development facilitated by the R3 Zoning District Update would be located within the defined boundaries of the Santa Clara Valley Groundwater Basin. However, since the City relies minimally on groundwater, roughly two percent of its total water supply, these changes would not significantly impact the sustainable management of groundwater resources. Development facilitated by the Project would not require additional reliance on existing groundwater supplies during normal years, as evaluated in Section 4.15, *Utilities and Service Systems*. Furthermore, the City's overall groundwater production capacity is substantially greater than its reliance on groundwater. Accordingly, any potential impact to groundwater supply would be marginal in nature, as the City maintains the capacity to produce more than twenty times the amount of groundwater that is used in a normal year. Nevertheless, groundwater serves as a supplemental source during dry years and compliance with the existing regulatory conditions governing groundwater use in the Project area ensures that the Proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Valley Water's GWMP for the Santa Clara and Llagas subbasins includes proactive measures such as recharge facilities, recycled water infrastructure, and conservation programs to ensure responsible groundwater stewardship. As such, continued compliance with these requirements supports sustainable groundwater conditions in the future and groundwater resources would be protected from overuse regardless of the water shortage conditions present in the Project area. Therefore, development facilitated by the Project would not decrease groundwater supplies or interfere with sustainable groundwater management. This impact would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation measures are required.

Threshold 3i:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

Impact HYD-3 THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON OR OFF SITE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

Development facilitated by the Project would require ground-disturbing activities during construction, which could contribute to erosion through the exposure of bare soils. The Project area is largely urbanized but does contain local waterways, including Stevens Creek and Permanente Creek, which construction could alter. However, the Project would be required to comply with existing regulations regarding water quality and erosion prevention. As discussed in Impact HYD-1, construction activities for development facilitated by the Project would disturb sites ranging from less than one acre to greater than five acres in size. Construction activities for developments greater than one acre would be required to comply with the Construction Stormwater General Permit. The Construction Stormwater General Permit requires preparation and implementation of a SWPPP and implementation of erosion control BMPs and sediment control BMPs designed to minimize erosion and retain sediment on site and good housekeeping BMPs to prevent spills, leaks, and off-site discharge of construction debris and waste. Regardless of individual site size, construction activities for development facilitated by the Project would be required to comply with the stormwater control requirements of Chapter 35 of the Mountain View Municipal Code, which requires developers to implement BMPs for construction activities to control the volume, rate, and potential pollutant load of stormwater runoff from new development and redevelopment projects to minimize the generation, transport, and discharge of pollutants. These regulations would ensure construction of development facilitated by the Project would not substantially alter the existing drainage pattern of the Change Areas in a manner that would result in substantial erosion or siltation on- or off-site. This impact would be less than significant.

Operation

Development facilitated by the Proposed Project could increase impervious surfaces, which may alter the existing drainage patterns of parcels associated with the R3 Zoning District Update. Many of the identified parcels have already been developed and contain some amount of existing impervious surfaces. An increase of impervious surfaces could result in an increased volume of stormwater runoff that can lead to downstream erosion in receiving waters, including creeks.

As described under Impact HYD-1, development facilitated by the Project would be required to comply with the requirements of the Phase I MS4 Permit, City of Mountain View stormwater requirements, and the Santa Clara Valley Urban Runoff Pollution Prevention Program. Development facilitated by the Project would be required to implement site design measures related to the creation or replacement of impervious surfaces. These site design measures may include, but are not limited to, use of porous pavement, vegetated swales, green roofs, rain barrels and cisterns, tree planting, source control, runoff reduction, stormwater treatment, and hydromodification management (SFBRWCB 2022). This includes the implementation of Source Control and low impact

development BMPs. Compliance with the requirements of the Phase I MS4 Permit would minimize the potential for stormwater runoff from individual sites to increase downstream erosion or siltation. Therefore, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site. This impact would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation measures are required.

Threshold 3.ii: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Impact HYD-4 THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD RESULT IN FLOODING ON OR OFF SITE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

Development facilitated by the Project would require ground-disturbing activities during construction; however, the Project area is largely urbanized but does contain local waterways, including Stevens Creek and Permanente Creek, which construction could alter and lead to flooding on or off site. As discussed under Impact HYD-1, construction of development facilitated by the Project would comply with the requirements of the Construction Stormwater General Permit and/or Mountain View Municipal Code requirements, including construction BMPs to control and direct on-site surface runoff to ensure substantial flooding would not occur. As described in Section 4.8.10, the Project area is located within Zone X and AE, which indicates an area of minimal flood hazard, and high-risk floodplains with a 1 percent annual chance of flooding, respectively (FEMA 2025). Therefore, the Project area may be subject to flood flows in the event of a 100-year or 500-year flood event. With implementation of BMPs, development facilitated by the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in flooding on or off site. This impact would be less than significant.

Operation

Development facilitated by the Proposed Project could increase impervious surfaces, which may alter the existing drainage patterns of identified R3 Zoning District Update sites. However, as indicated in Section 4.8.1c, *Flooding and Inundation*, the Project area is designated as Zone X and AE, which has a very low risk of flooding and 1% annual chance of flooding, respectively. As discussed under Impact HYD-1, development facilitated by the Project would be required to comply with the requirements of the Phase I MS4 Permit, and the SCVURPPP and City of Mountain View stormwater requirements, including implementation of LID BMPs. As required by the Phase I MS4 Permit, development would be required to implement BMPs to collect, store, and convey stormwater runoff on the Project site so that substantially increased flooding would not occur

during storm events. LID BMPs are implemented to mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, and detain runoff rather than allowing runoff to flow directly to piped or impervious storm drains. In addition, consistent with Mountain View Municipal Code Section 8.163.1, a flood development permit would be required before the start of construction activities begins within any area of special flood hazard established in Section 8.162.2.Adherence to permit conditions would ensure that flood flows are not redirected.

Therefore, compliance with the Phase I MS4 Permit and existing City regulations would ensure the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in flooding on or off site. This impact would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation measures are required.

Threshold 3.iii: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Impact HYD-5 THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

The Project area is largely urbanized but does contain local waterways, including Stevens Creek and Permanente Creek, which construction could alter. However, the Project would be required to comply with existing regulations regarding runoff water prevention and control. As discussed under Impact HYD-1, construction of development facilitated by the Project would comply with the requirements of the Construction Stormwater General Permit and/or Mountain View Municipal Code requirements, including construction BMPs to control the volume, rate, and potential pollutant load of stormwater runoff. With implementation of BMPs, development facilitated by the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result incapacity exceedance of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. This impact would be less than significant.

Operation

Pollutants associated with residential and commercial development include household garbage, household products, fertilizers, cleaning products, electronic waste, and food waste. Pollutants carried off site during storm events could degrade the water quality. As discussed in Impact HYD-1, development facilitated by the Project would be required to comply with the requirements of the

Phase I MS4 Permit, City of Mountain View stormwater requirements. Development facilitated by the Project would also be required to implement site design measures related to the creation or replacement of impervious surfaces. These site design measures may include, but are not limited to, use of porous pavement, vegetated swales, green roofs, rain barrels and cisterns, tree planting, source control, runoff reduction, stormwater treatment, and hydromodification management (San Francisco Bay RWQCB 2021). Compliance with NPDES requirements, including incorporation of operational BMPs into project design to target pollutants of concern, would minimize pollutant discharge during operation. Implementation of requirements and BMPs would ensure the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces. In particular, implementation of requirements and BMPs would ensure that drainage patterns are not altered in a manner which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. This impact would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation measures are required.

Threshold 3.iv :	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?
Threshold 4:	In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Impact HYD-6 THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS AND WOULD NOT RELEASE OF POLLUTANTS DUE TO PROJECT INUNDATION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As described in Section 4.8-1, Mountain View is located within Zone X and AE , which indicates an area of minimal flood hazard and high-risk floodplains with a 1 percent or 0.2 percent annual chance of flooding, respectively (FEMA 2024). The proposed Change Areas and associated R3 Zoning District Update sites are not located within a flood zone hazard. However, consistent with Mountain View Municipal Code Section 8.163.1, a flood development permit would be required before the start of construction activities begins within any area of special flood hazard established in Section 8.162.2 of the Mountain View Municipal Code. Adherence to permit conditions would ensure that flood flows are not redirected. Compliance with permit conditions and FEMA regulations would reduce impacts related to the release of pollutants from flooding. Impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation measures are required.

Threshold 5:	Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HYD-7 THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Water Quality Control Plans

The Basin Plan is the applicable water quality control plan for the Project area. The Basin Plan defines beneficial uses, sets forth water quality objectives, and establishes programs to manage the quality of surface water and groundwater and achieve those water quality objectives for protection of beneficial uses.

As described in in Impact HYD-1, development facilitated by the Project would comply with regulations such as the Phase I MS4 Permit, Construction Stormwater General Permit, SCVURPPP, and/or Mountain View Municipal Code, each of which require the implementation of BMPs in order to minimize potential water quality impairments associated with the construction and operation of new development. These BMPs would minimize water quality impacts, maintain beneficial uses described in the Basin Plan, and maintain the water quality. Therefore, the Project would not conflict with or obstruct implementation of the Basin Plan or SCVURPPP. This impact would be less than significant.

Sustainable Groundwater Management Plan

Mountain View's water supply and groundwater management are overseen by the local agencies of City of Mountain View, SFPUC, and Valley Water. These agencies do not rely on adjudicated basins or historic appropriative rights but instead operate under SGMA-compliant frameworks that emphasize recharge programs, conservation, and sustainable pumping practices. The Project area is located within the Santa Clara Basin, which is actively managed by Valley Water. Valley Water serves as the GSA and has submitted an approved GSP to the DWR. Groundwater use in the Mountain View area is conducted in compliance with applicable regulatory requirements, including SGMA mandates and local ordinances. As discussed under Impact HYD-2, the City of Mountain View does not rely primarily on groundwater for its water supply. Groundwater sources supply approximately 3 percent of the city's drinking water and Project implementation would not result in substantial increased demand of groundwater supply sources as determined in Section 4.15, *Utilities and Service Systems*. Therefore, the R3 Zoning District Update would not conflict with Valley Water's GSP and impacts would be less than significant.

The Proposed Project would not conflict with or obstruct the implementation of any sustainable groundwater management plan, therefore, impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation measures are required.

4.8.4 Cumulative Impacts

IMPACT HYD-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD NOT SUBSTANTIALLY DEGRADE SURFACE OR GROUNDWATER QUALITY, WOULD NOT RESULT IN A SIGNIFICANT INCREASE IN EROSION, SILTATION, OR POLLUTED RUNOFF, WOULD NOT SUBSTANTIALLY ALTER DRAINAGE PATTERNS OR INCREASE FLOOD HAZARDS, AND WOULD NOT RESULT IN A CUMULATIVELY SIGNIFICANT IMPACT ON GROUNDWATER RESOURCES OR WATER SUPPLY. CUMULATIVE HYDROLOGY AND WATER QUALITY IMPACTS WOULD BE LESS THAN SIGNIFICANT, AND THE CONTRIBUTION OF THE PROJECT WOULD NOT BE CUMULATIVELY CONSIDERABLE.

The geographic scope for cumulative hydrology and water quality impacts is the San Francisco Bay Hydrologic Region (for surface water-related impacts), and the area which is provided groundwater from the Santa Clara Groundwater Basin (for groundwater-related impacts). The San Francisco Bay Hydrologic Region is an appropriate geographic scope for surface water-related cumulative impacts because surface water quality impacts are localized in the watershed where the impact occurs and may influence the city of Mountain View. The area which is provided groundwater from the Santa Clara Groundwater Basin is an appropriate geographic scope for groundwater-related cumulative impacts because groundwater impacts related to sustainable management are influenced by cumulative development which relies on the Santa Clara Groundwater Basin for water supply. Regional cumulative impacts consider impacts that would occur from the buildout of cumulative planning documents and reasonably anticipated projects identified in Chapter 3, *Environmental Setting*. The general approach to cumulative impact analysis used in this EIR is discussed in Chapter 4, *Environmental Impact Analysis.*

Cumulative development would generally increase impervious surfaces, which could increase peak flood flows, alter drainage patterns, and increase pollutants in regional stormwater. However, cumulative development would be required to adhere to applicable regulations designed to control erosion, stormwater flows, and protect water quality, including, but not limited to, coverage under the Construction Stormwater General Permit, adherence to Phase I MS4 Permit requirements, and compliance with applicable Municipal Code requirements. Compliance with these applicable regulations would require each individual project to incorporate BMPs and other drainage facilities designed to address drainage and surface water quality protection. As a result, cumulative impacts to surface and ground water quality, erosion or siltation, flooding, and polluted runoff (Thresholds 1, 3.i, 3.ii, 3.iii, and 5) would be less than significant.

As described in Impact HYD-6, several portions of the Project area are within either a 100-year or 500-year flood zone and could be at risk of inundation due to flood hazards. Compliance with the City's Flood Hazard Ordinance as described in Chapter 8 of the City Code, FEMA regulations, and City standard conditions of approval would reduce potential effects from flooding. As such, cumulative impacts to flood flows and inundation in flood hazard zones would be less than significant (Thresholds 3.iv and 4).

Water demand would occur with population growth associated with cumulative development; however, implementation of the Proposed Project would not significantly increase use of groundwater from the Santa Clara Valley Groundwater Basin. Cumulative development would increase the number of residential units and square footage of non-residential uses in the Project area and would introduce associated water demands. Cumulative development would be required to be consistent with existing General Plan and Zoning Code requirements. The UWMP includes demand reduction measures to reduce water demand in times of drought or water shortages. Implementation of these measures, if necessary, would reduce impacts to water supply associated with cumulative development. Although cumulative development would increase water demands

and there are projected supply shortage conditions detailed in the City and individual water purveyor UWMPs, increased demand of groundwater resources would be very limited and within the recharge capacity of the basin. Therefore, cumulative impacts related to groundwater resources would be less than significant (Thresholds 2 and 5).

4.9 Land Use and Planning

This section analyzes the consistency of the Proposed Project with applicable land use plans, policies, and regulations, and identifies environmental effects that could arise from such inconsistencies.

4.9.1 Setting

Established Land Uses

Mountain View is almost fully built out with a total population of 81,875 persons as of May 2025 (California Department of Finance 2025), within an area of about 12 square miles. The primary land uses in the city are open spaces and residential uses. Industrial, commercial, civic, and institutional uses are also present throughout the Project area (City of Mountain View 2012). Table 4.9-1 provides the estimated total acreages of each General Plan land use designation within the city of Mountain View as of 2012.

Table 4.9-1 Existing General Plan Land Uses Within Mountain View

	Project Area Total	
Land Use	**Acres**	**Percent of Total**
Residential	2,910	45.5
Commercial	122	2.0
Office/Industrial	896	14.0
Mixed-Use	761	11.9
Public Institutional	1,703	26.6
Total	**6,392**	**100.0**

Source: City of Mountain View, 2012

Figure 2-3 through Figure 2-6 in Chapter 2, *Project Description*, provide the existing zoning and land use designations of identified R3 Zoning District Update sites, and areas proposed for zoning and land use designation changes.

Residential

Residential land use designations are the most prevalent land use in Mountain View, occupying approximately 45.5 percent of Mountain View. Most areas designated for residential land use are occupied by detached, single-family homes with low-density residential land use designation. Higher density residential land use designations occupy approximately one percent (22 acres) of the city, generally consisting of multi-family housing concentrated adjacent to transit, shopping, and public facilities. This multi-family housing primarily consists of apartments and condominiums up to five stories high and 36 to 80 dwelling units per acre. Medium-high residential land use designations occupy approximately 11 percent (345 acres) of land use and generally consist of apartments and condominiums, with shared open space and 26 to 35 dwelling units per acre (City of Mountain View 2012).

Commercial

Commercial land use designations occupy approximately two percent of Mountain View. Commercial designations include areas for retail and offices consisting of shopping and services for pedestrians, bicyclists and motorists. Retail recently developed includes amenities such as benches, shade trees, safe access from streets, street engaged building designs, and open space located to provide gathering opportunities (City of Mountain View 2012).

Office/Industrial

Office/Industrial land use designations cover approximately 14 percent of Mountain View and include office, research and development, light industrial and manufacturing uses serving regional, national and international uses (City of Mountain View 2012).

Mixed-Use

Mixed-use land use designations occupy approximately 11.9 percent of Mountain View and generally consists of buildings and spaces with complementary uses such as retail, offices, residential, or other (City of Mountain View 2012).

Public/Institutional

Public/Institutional land use designations cover approximately 26.6 percent of Mountain View and generally includes government-owned facilities, public and private school facilities and public utilities. Approximately 1,347 acres of this land is occupied City-owned parks, gardens, public schools, facilities owned and operated by the City of Mountain View, and larger open spaces (e.g., Shoreline at Mountain View Regional Park and Stevens Creek Trail open space) (City of Mountain View 2012)

4.9.2 Regulatory Setting

a. State Regulations

Planning and Zoning Law

State law requires each city and county in California to adopt a general plan for the physical development of the land within its planning area (Government Code Sections 65300-65404). The general plan must contain land use, housing, circulation, open space, conservation, noise, safety, and environmental justice elements, as well as any other elements that the city or county may wish to adopt. The circulation element of a local general plan must be correlated with the land use element.

Zoning authority originates from city and county police power and from the state's Planning and Zoning Law, which sets minimum requirements for local zoning ordinances. The city or county zoning code is the set of detailed requirements that implement the general plan policies at the level of the individual parcel. The zoning code presents standards for different uses and identifies which uses are allowed in the various zoning districts of the jurisdiction. Since 1971, state law has required the city or county zoning code to be consistent with the jurisdiction's general plan.

Housing Accountability Act

The Housing Accountability Act was passed in 1982 in recognition that "the lack of housing, including emergency shelters, is a critical problem," and "among the consequences of those actions are discrimination against low-income and minority households, lack of housing to support employment growth, imbalance in jobs and housing, reduced mobility, urban sprawl, excessive commuting, and air quality deterioration." The Housing Accountability Act removes barriers to infill housing development projects by expediting housing approvals, and prevents local agencies from disapproving housing development projects for very low-, low-, or moderate-income households except in limited circumstances. On September 29, 2017, Governor Brown signed Senate Bill (SB) 167, Assembly Bill (AB) 1515, and AB 678 to amend the Housing Accountability Act to further limit a local agency's ability to disapprove or reduce the density of residential projects. In 2023, Governor Newsom signed AB 1633, which *inter alia* gives project developers the ability to challenge a local government's decision to deny the use of a CEQA exemption for eligible infill development projects. In 2024, Governor Newson signed AB 1893 to amend the Housing Accountability Act to apply site restrictions density limits, and other requirements to new projects after January 1, 2025, and signed AB 1886 to foreclose several legal arguments used in opposition of "Builder's Remedy" projects.

Senate Bill 330, Housing Crisis Act

SB 330 took effect in 2019 and declared a statewide housing emergency to be in effect until January 1, 2025. SB 8 was signed in 2021 to extend the provisions of SB 330 until January 1, 2030. SB 330 prohibits cities and counties from the following actions:

- Establishing rules that would change the land use designation or zoning of parcels to a less intensive use or reducing the intensity of the land that was allowed under the specific or general plan as is in effect on January 1, 2018;
- Imposing or enforcing a moratorium on housing development within all or a selection of the local agency's jurisdictions;
- Imposing or enforcing new design standards established on or after January 1, 2020, that are not objective design standards;
- Establishing or implementing limits on permit numbers issued by the local agency unless the limit was approved before January 1, 2005, in a "predominantly agricultural county."

Sustainable Communities and Climate Protection Act (SB 375)

The Sustainable Communities and Climate Protection Act (SB 375) supports the state's climate goals by helping reduce greenhouse gas emissions through coordinated transportation, housing, and land use planning. Under the Act, the California Air Resources Board set targets for 2020 and 2035 for each of the 18 metropolitan planning organization regions in 2010 and updated them in 2018. Each of the regions must prepare a Sustainable Communities Strategy (SCS), as an integral part of its regional transportation plan, that contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet the California Air Resources Board's targets. The Act establishes some incentives to encourage implementation of the development patterns and strategies included in an SCS. Developers can get relief from certain environmental review requirements under the California Environmental Quality Act (CEQA) if their new residential and mixed-use projects are consistent with a region's SCS that meets the targets (see Public Resources Code Sections 21155, 21155.1, 21155.2, 21159.28).

b. Regional and Local Regulations

Metropolitan Transportation Commission/Association of Bay Area Governments Plan Bay Area 2050

The Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) includes the counties of Alameda, Contra Costa, Marin, Napa, San Franciso, San Mateo, Santa Clara, Solano, Sonoma and all incorporated cities therein. MTC and ABAG are responsible for implementing the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is called Plan Bay Area 2050 (ABAG 2021).

The Plan Bay Area 2050 was approved by the MTC Commission and the ABAG Executive Board in October 2021 and is a comprehensive planning effort that coordinates land use patterns, transportation and economic investments with the objective of developing a more equitable and resilient future for Bay Area residents. Plan Bay Area 2050 is built on a set of integrated policies, strategies, and investments to maintain and to meet the diverse needs of the region through 2050. Plan Bay Area 2050 describes where and how the region can accommodate the projected population of 10 million residents and approximately 1 million new households and jobs between 2015 and 2050.

- Between 2015 and 2050, Plan Bay Area 2050 estimates the Bay Area will add 1.4 million new jobs, for a total of 5.4 million bay area workers (ABAG 2021). Household growth is anticipated to follow pace, adding slightly fewer than 1.4 million new households for a total of 4 million households by 2050. This growth would bring the Bay Area's population to an estimated 10.3 million residents by 2050, up from around 7.8 million in 2021. Plan Bay Area 2050 estimates the region would need to build another 1.4 million new homes by 2050 to meet forecasted future demand (ABAG 2021).

City of Mountain View 2030 General Plan

The City of Mountain View adopted the current General Plan in 2012. The General Plan serves as the principal policy document guiding future conservation and development of the city, as guided by development policies included within the General Plan. The General Plan's policies address land use, housing, transportation, parks and recreation, natural resources, historic and archaeological resources, urban structure and design, public facilities, and health and safety. Applicable policies from the Land Use Element are included below.

Goal LUD-1: Open and inclusive planning processes.

Policy LUD 1.1: **Efficient and effective processes.** Regulate development through efficient, effective and transparent review processes

Policy LUD 1.5: **Development review process**. Use the City's development review process to ensure well-designed projects.

Goal LUD-3: A diverse, balanced and flexible mix of land uses that supports a strong economy, complete neighborhoods, transit use and community health.

Policy LUD 3.1: **Land use and transportation**. Focus higher land use intensities and densities within a half-mile of public transit service, and along major commute corridors.

Policy LUD 3.2: **Mix of land uses**. Encourage a mix of land uses, housing types, retail and public amenities and public neighborhood open spaces accessible to the community.

Policy LUD 3.3: Health. Promote community health through land use and design.

Policy LUD 3.4: **Land use conflicts**. Minimize conflicts between different land uses.

Policy LUD 3.5: **Diversity**. Encourage residential developments serving a range of diverse households and incomes.

Policy LUD 3.9: Parcel assembly. Support the assembly of smaller parcels to encourage infill development that meets City standards and spurs neighborhood reinvestment

Goal LUD-5: Pedestrian-accessible village centers that serve surrounding neighborhoods.

Policy LUD 5.1: **Land use and village centers**. Encourage and promote centers that people can reach by bicycling or walking with a focus on areas identified in the Village Center Strategy Diagram.

Policy LUD 5.2: **Village center uses and character.** Encourage a mix of residential, commercial or other neighborhood-serving uses in village centers, with active ground-floor uses and public space to create an inviting pedestrian environment and a center of activity.

Policy LUD 5.3: Community gathering. Encourage community-gathering destinations such as plazas, open space or community facilities within village centers.

Policy LUD 5.4: **Connections**. Encourage pedestrian, bicycling and public transit connections and amenities between village centers and surrounding neighborhoods.

Goal LUD-6: Distinctive neighborhoods that preserve and enhance the quality of life for residents.

LUD 6.1: Neighborhood character. Ensure that new development in or near residential neighborhoods is compatible with neighborhood character.

Goal LUD-9: Buildings that enhance the public realm and integrate with the surrounding neighborhood.

Policy LUD 9.1: Height and setback transitions. Ensure that new development includes sensitive height and setback transitions to adjacent structures and surrounding neighborhoods.

Policy LUD 9.2: Compatible transit-oriented development. Encourage transit-oriented development

City of Mountain View El Camino Real Precise Plan

The City of Mountain View adopted the EL Camino Real Precise Plan on November 2014. The Precise Plan established the vision for the El Camino area, which generally consists of 287 acres connecting Sunnyvale to the southeast and with Palo Alto and Los Altos to the northwest. The Precise Plan established guiding principles for intensive development and physical composition, specifically streetscape improvements and transit service; buffers between commercial and residential uses; and the regional transportation importance of El Camino Real to the entire community of Mountain View and adjacent incorporated cities.

Mountain View 2023-2031 Housing Element

The 2023-2031 Housing Element identifies the City's current housing conditions and future housing needs while outlining initiatives to improve available housing for populations with various income levels within the City. The current plan covers the 2023 to 2031 period and is updated every 8 years

as mandated by the State Department of Housing and Community Development. The following goal and policies are applicable to the Project area:

Goal 1: An increase in the quantity and diversity of housing options, focusing on active nodes, and walkable neighborhoods with amenities and services.

Policy 1.1: Ensure that adequate residential land is available to accommodate the City's RHNA, with special focus on Precise Plan areas near transit, employment centers, and services.

Policy 1.2. Encourage a mix of housing types, at a range of densities, that serves a diverse population, including rental and ownership units serving both young and mature families, singles, young professionals, single-parent households, seniors, and both first-time and move-up buyers, at a broad range of incomes, through development policies and City-subsidized affordable housing.

City of Mountain View Zoning Ordinance

Zoning is the instrument that implements the land use designations of the General Plan. In addition to establishing permitted uses, zoning may also establish development standards relating to issues such as intensity, setbacks, height, and parking. Projects submitted to the City for review and approval are generally evaluated for consistency with the zoning classifications.

The City of Mountain View Zoning Ordinance is the primary tool used by the City to carry out the goals, objectives, and policies of the Mountain View General Plan by classifying and regulating the uses of land and structures within the city, consistent with the General Plan. The City's Zoning Ordinance, contained in Chapter 36 of the City Code and outlines specific land use and development regulations for each property within the City. Additionally, identifies specific types of businesses allowed throughout the City, sets height limits, building setbacks, landscaping requirements, and other development standards for each zoning district in Mountain View. The purpose of the Zoning Ordinance is to promote and protect the public health, safety, peace, general welfare; growth and redevelopment within the City of Mountain View in an orderly manner; and implement the Mountain View General Plan.

The Project area is divided into zoning districts with allowed uses that are listed in Table 4.9-2.

Table 4.9-2 City of Mountain View Zoning Districts in the Project Area

Zoning District	Allowed Uses
R2	One-and Two -Family Residential (R2) consistent of single-family dwellings, duplexes, low-density rowhouse and townhouse developments, and small-lot single family developments; allowing up to 12 dwelling units per acre (DU/ac)
R3	Multi-family Residential (R3) district permits multi-family housing including apartments, condominiums, rowhouse and townhouse development, small-lot single-family development, and similar and related compatible uses. R3 consists of the medium, medium-high, and high-density residential land use designation of the General Plan, which allows up to 25, 35, and 80 DU/ac, respectively.
R4	High Density Residential and Multi-family (R4) district consisting of multi-family housing including apartments and condominiums with maximum density of 80 DU/ac; increased density allowed under specific circumstances, including 100% affordable housing projects as authorized by City Council
P	Precise Plan Zones (e.g., El Camino Real, Evandale, San Antonio) consisting of various uses per the applicable Precise Plan's tailored standards

Source: City of Mountain View 2025

4.9.3 Impact Analysis

Methodology and Significance Thresholds

Methodology

The land use and planning analysis describes existing regional and local plans and policies and is intended to fulfill the requirements of *CEQA Guidelines* Section 15125(d). The emphasis of the analysis is on plan inconsistency and potential conflicts between the Proposed Project and existing applicable land use plans where they could result in environmental impacts. The Proposed Project is considered consistent with the provisions of the identified regional and local plans if it meets the general intent of the applicable plans. A given project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation. It follows that it is nearly, if not impossible, for a project to be in perfect conformity with each and every policy set forth in the applicable plan. Furthermore, any inconsistency would also have to result in a physical change in the environment, not analyzed in the other resource chapters of this DEIR, to result in a significant environmental impact. The analyses below provide a brief overview of the most relevant policies and development standards from the various planning documents. However, the City's consistency conclusions are based upon the planning documents as a whole. In addition, potential impacts are evaluated based on potential environmental impacts that could result from inconsistencies.

Significance Thresholds

To determine whether a project would result in a significant impact to Land Use and Planning, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

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

Project Impacts and Mitigation Measures

Threshold 1:	Would the project physically divide an established community?

Impact LU-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY. NO IMPACT WOULD OCCUR.

The Proposed Project would involve updates to the City's zoning districts to support housing development. These updates include modifications to zoning regulations, district standards, and the zoning map to increase housing capacity and implement key Housing Element programs. The Project establishes new R3 subdistricts (R3-A through R3-D2) with revised densities and form-based standards, and rezones select R2 parcels to support multi-family housing near transit and high-opportunity areas. Additional updates align all residential zoning districts and Precise Plans with state housing laws, modify the Zoning Ordinance and Map, and include related General Plan amendments for consistency.

The Project would apply to 8,350 parcels across 1,260 acres and facilitate greater density, but would not approve specific development on identified parcels. As discussed in Chapter 2, *Project Description*, projected growth would occur primarily as infill redevelopment characterized by a

broad diversity of housing types, including apartments, condominiums, and other residential and mixed-use projects. As described in Chapter 2, *Project Description*, three of the five proposed zoning subdistricts would increase the city's housing capacity. Proposed zoning districts R3-A, R3-D1, and R3-D2 would accommodate 15 to 20 DU/ac among 61 acres, 50 to 75 DU/ac across 138 acres, and 75 to 110 DU/ac across 138 acres, respectively.

Because development facilitated by the Project would occur on existing infill parcels within the city, it would not physically divide established neighborhoods within the City of Mountain View. As described in Chapter 2*, Project Description,* the identified rezoning areas are well-connected to the existing circulation network and would not require new roadways. The Project supports a balanced mix of land uses and promotes orderly, integrated development patterns.

While implementation of the Proposed Project would facilitate the future development of new housing and housing at higher densities than currently exist in some areas, these changes would not alter the physical layout of the city such that movement within or across the city would be obstructed. The Proposed Project also does not propose any roadways, such as freeways, or other linear features that would divide the city or isolate individual neighborhoods within it. The Proposed Project would promote balanced growth and facilitate integrated development patterns to allow for residential and commercial development, and would not result in a physical division of an established community. Therefore, impacts related to physically dividing an established community would be less than significant.

Mitigation Measures

This impact would be less than significant without mitigation. Mitigation would not be required.

Threshold 2:	Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact LU-2 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD BE CONSISTENT WITH APPLICABLE REGIONAL PLANS, LOCAL PRECISE PLANS, AND RELEVANT REGULATIONS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Several regionally and locally adopted land use plans, policies, and regulations are relevant to potential future development under the Proposed Project. These include MTC/ABAG Plan Bay Area 2050, the City 2030 General Plan, and the El Camino Real Precise Plan. The Project's consistency with each is discussed below.

Metropolitan Transportation Commission/Association of Bay Area Governments Plan Bay Area 2050

MTC/ABAG Plan Bay Area is a long-range land use and transportation plan for the San Francisco Bay region. The Plan Bay Area 2050 identifies 36 strategies. ABAG's growth and development scenarios is generally consistent with buildout that would be facilitated by the Project, as the Project prioritizes housing development. Plan Bay Area 2050 contains five guiding principles intended to benefit the region (ABAG 2021). The three guiding principles in Plan Bay Area 2050 that are relevant to the environmental analysis are:

- **Affordable:** All Bay Area residents and workers have sufficient access to housing options they can afford — households are economically secure.

- **Connected:** An expanded, well-functioning, safe and multimodal transportation system connects the Bay Area – fast, frequent and efficient intercity trips are complemented by a suite of local transportation options, connecting communities and creating a cohesive region.
- **Diverse:** The Bay Area is an inclusive region where people from all backgrounds, abilities, and ages can remain in place with access to the region's assets and resources.
- **Healthy**: The region's natural resources, open space, clean water and clean air are conserved — the region actively reduces its environmental footprint and protects residents from environmental impacts.

The Project would support these principles by facilitating higher-density housing on infill sites already served by transit and infrastructure, promoting affordability, inclusivity, and reduced environmental impact. The Proposed Project involves revising and updating development standards to the R3 Zoning District to be consistent with state housing requirements and facilitating the development of a range of housing types in Mountain View. Residential development facilitated by the Project would be higher density than permitted under current zoning designations and would be located on previously developed or infill sites within the city, which are served by existing transit and infrastructure. Accordingly, the Project would facilitate housing in a developed area with active transportation options and, as a result, would not conflict with the guiding principles of Plan Bay Area 2050.

Overall, the Project would not conflict with MTC/ABAG guiding principles and strategies adopted for the purpose of avoiding or mitigating an environmental effect and impacts would be less than significant.

City of Mountain View General Plan

The Project involves updating the City of Mountain View's R3 Zoning District to be consistent with state housing requirements and facilitating the development of a range of housing types in Mountain View. To ensure consistency between the Housing Element, General Plan, and to comply with recent state laws, the Project also involves zoning amendments in the R2 zoning district and updates to nonconforming standards. Proposed revisions to the R2 zoning district would rezone select parcels to R3-A or allow opportunities for SB 9 and Accessory Dwelling Units (ADUs), pursuant to Housing Element Program 1.3(h), as described in Chapter 2, *Project Description*. Program 1.5 of the Housing Element, Nonconforming R1 and R2 Multi-Family Developments update for nonconforming standards in Division 3 (Nonconforming Uses and Structures) of Article III (General Regulations, Special Provisions, Exceptions and Interpretations) of Chapter 36 (Zoning) of the City Code, would allow broader opportunities to maintain or redevelop existing multi-family housing that exceeds current zoning limits.

As noted under the Housing Accountability Act, the Legislature has concluded that "the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California." More specifically, the Legislature's stated intent is "to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal" (Government Code Section 65581). The Project would implement the City's Housing Element to be in compliance with state housing legislation. The Project provides the opportunity for future development of a broader range of housing types and increasing the overall housing supply which is supportive of the City's goal and policies, outlined above in Section 4.9.2, *Regulatory Setting*. The Project would be

substantially consistent with the City's General Plan as a whole; in particular, the adoption of the R3 Zoning District Update would support multi-family housing development, aligning with Goals LUD-3 and LUD-9 which call for diverse, balanced and flexible land uses and integration of buildings that enhance the public realm with the surrounding neighborhoods, respectively. The Project would facilitate the development of housing proximate to transit services, and would encourage pedestrian, bicycling, and public transit connections, consistent with Policy LUD 3.1. The General Plan would include revised densities to several land use designations to be consistent with the proposed zoning amendments, and revisions to the land use map to reflect sites with increased densities. These revisions would ensure that land use designations, allowable land uses, and densities in the General Plan are consistent with housing development envisioned in the Change Areas. These amendments, and the Project as a whole, would not facilitate specific development; rather, the revisions and amendments would enable implementation of and ensure consistency with the City's General Plan and Housing Element, consistent with Goal LUD 1. Accordingly, the proposed amendments would not allow specific development that could result in environmental impacts. The Project would not involve other changes to other elements of the City's General Plan, and development facilitated by the Project would continue to be subject to existing General Plan goals and policies that have the purpose of avoiding or mitigating an environmental effect. Accordingly, the Project would not conflict with General Plan goals and policies adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

City of Mountain View El Camino Real Precise Plan

The El Camino Real Precise Plan area encompasses the 3.9-mile corridor consisting of 287 acres connecting Sunnyvale to the southeast with Palo Alto and Los Altos to the northwest. The Project would not involve rezoning these sites, as discussed in Chapter 2.4 of the *Project Description;* the Proposed Project includes minor amendments affecting two condominium sites within the El Camino Real Precise Plan Area. These amendments would update the designation of the sites to "Medium Intensity Corridor" to ensure consistency with the General Plan. Importantly, the Project does not involve increasing the allowable density beyond what is currently permitted under the General Plan. The proposed changes are administrative in nature and are intended to align the zoning and General Plan designations with the existing use and development standards of the sites. Because the Project does not alter the guiding principles of the El Camino Real Precise Plan, such as promoting walkability, supporting transit-oriented development, and enhancing the public realm, it does not conflict with policies adopted to avoid or mitigate environmental impacts. Therefore, development facilitated by the Project on the two condominium sites identified in the Precise Plan would be consistent with the land uses and buildout potential in the Precise Plan and impacts would be less than significant.

Conclusion

As described above, the Proposed Project is consistent with land use plans, policies, and regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect, including MTC/ABAG Plan Bay Area 2050, the City General Plan, the City's Housing Element and El Camino Real Precise Plan. Impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation measures are required.

4.9.4 Cumulative Impacts

IMPACT LUP-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD NOT RESULT IN THE PHYSICAL DIVISION OF AN ESTABLISHED COMMUNITY AND WOULD NOT SUBSTANTIALLY CONFLICT WITH APPLICABLE LAND USE PLANS, POLICIES, OR REGULATIONS ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT. CUMULATIVE LAND USE AND PLANNING IMPACTS WOULD BE LESS THAN SIGNIFICANT, AND THE CONTRIBUTION OF THE PROJECT WOULD NOT BE CUMULATIVELY CONSIDERABLE.

The geographic scope for cumulative land use and planning impacts is the City of Mountain View and the ABAG area. This geographic scope is appropriate because buildout facilitated by the Project would affect overall buildout in the MTC/ABAG area and is an applicable regional plan that includes Mountain View. Cumulative buildout in this region shown on Table 2-2 of Chapter 2, *Project Description* and on Figure 2-6, would have the potential to adversely impact land use and planning.

None of the identified Change Areas in Table 2-1 would result in the physical division of an established community, as they would involve development within established parcels and would not involve construction of a roadway or other linear feature that would divide an established community. Therefore, cumulative impacts related to dividing an established community (Threshold 1) would be less than significant.

Cumulative projects would be required to adhere to applicable zoning and development regulations, and General Plan policies that are intended to mitigate environmental impacts where feasible. Cumulative projects would also be reviewed for consistency with applicable land use plans by the approving jurisdiction prior to approval. Because it is unlikely that jurisdictions would approve a project that is substantially inconsistent with applicable land use plans and policies, it is not anticipated that cumulative development would be in substantial conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect . In addition, as discussed under “Methodology” above, cumulative projects would not be expected to be in perfect conformity with each and every policy, nor does state law require precise conformity of a proposed project with every policy or land use designation. Therefore, it is anticipated that cumulative projects would not substantially conflict with applicable plans and policies prior to approval, such that cumulative projects would not result in a significant cumulative environmental impact related to land use plan consistency (Threshold 2).

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4.10 Noise

This section analyzes potential impacts related to noise and vibration from the Proposed Project. Topics addressed include construction noise and vibration, on-site operational noise, traffic noise, and aircraft noise.

4.10.1 Setting

Noise

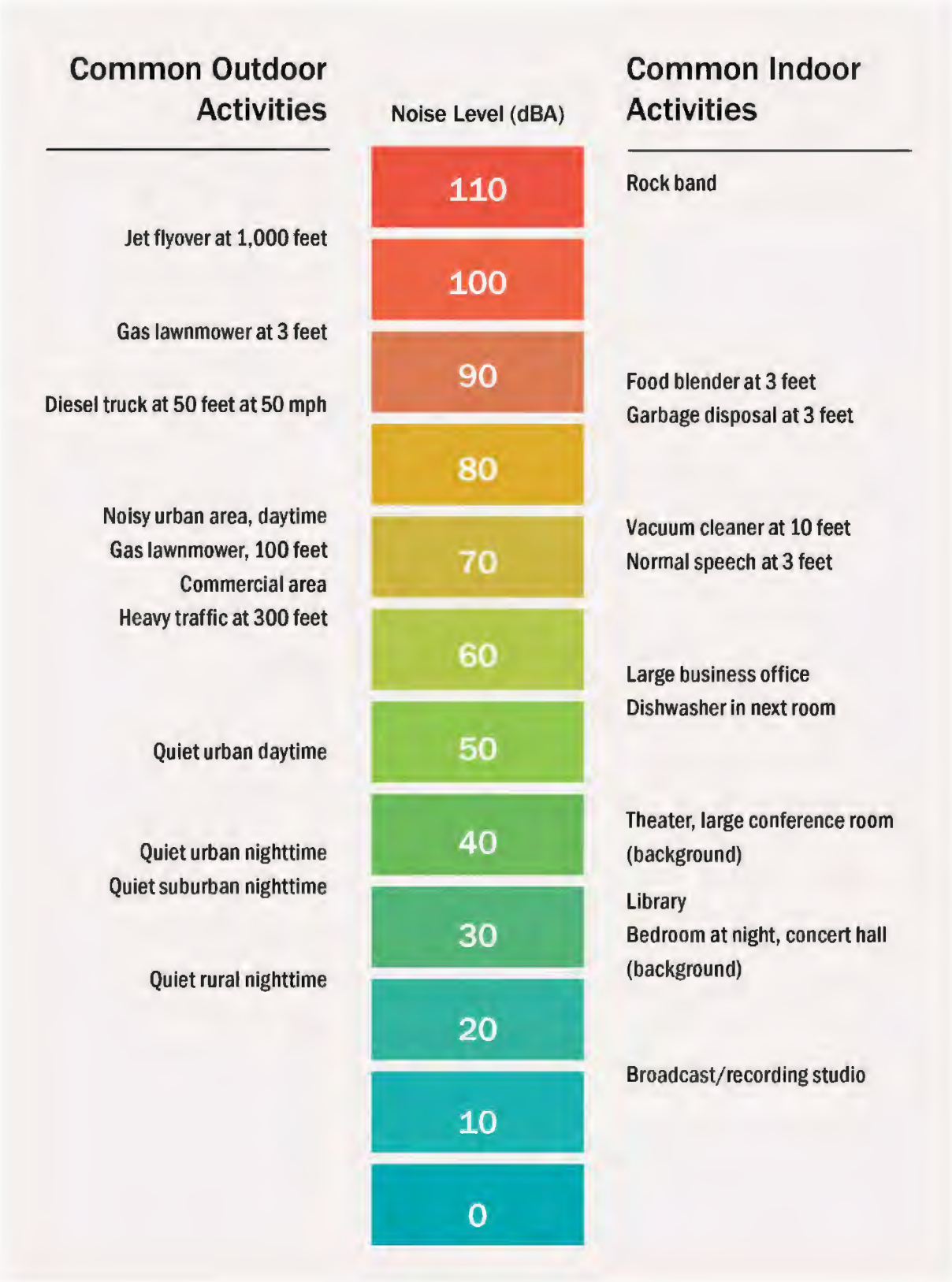
Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs (e.g., the human ear). Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (Hz) and less sensitive to frequencies around and below 100 Hz (Kinsler, et. al. 1999). Decibels are measured on a logarithmic scale. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB (Crocker 2007). Common outdoor and indoor noise sources and their typical corresponding A-weighted noise levels are shown in Figure 4.10-1.

Human perception of noise has no simple correlation with sound energy. The perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive an increase (or decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud (10.5 times the sound energy) (Crocker 2007).

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in sound level as the distance from the source increases. The manner by which noise declines with distance depends on factors such as the type of sources (e.g., point or line), the path the sound will travel, site conditions, and obstructions. Noise levels from a point source (e.g., construction, industrial machinery, ventilation units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). The propagation of noise is also affected by the intervening ground, known as ground absorption. A hard site, such as a parking lot or smooth body of water, receives no additional ground attenuation and the changes in noise levels with distance (drop-off rate) result simply from the geometric spreading of the source. An additional ground attenuation value of 1.5 dBA per doubling of distance applies to a soft site (e.g., soft dirt, grass, or scattered bushes and trees) (Caltrans 2013).

Figure 4.10-1 Examples of Typical Noise Levels



Source: Caltrans 2013

Noise levels may also be reduced by intervening structures. The amount of attenuation provided by this "shielding" depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5 dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011). Structures can substantially reduce occupants' exposure to noise as well. The FHWA's guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

Descriptors

The impact of noise is not a function of loudness alone. The time of day when noise occurs, its frequency, and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed.

One of the most frequently used noise metrics that considers both duration and intensity is the equivalent noise level (L_{eq}). The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. Typically, L_{eq} is equivalent to a one-hour period, even when measured for shorter durations as the noise level of a 10- to 30-minute period would be the same as the hour if the noise source is relatively steady. L_{max} is the highest Root Mean Squared (RMS) sound pressure level within the sampling period, and L_{min} is the lowest RMS sound pressure level within the measuring period (Crocker 2007). Normal conversational levels at three feet are in the 60- to 65-dBA L_{eq} range and ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

Noise that occurs at night tends to be more disturbing than that which occurs during the day. Community noise is usually measured using Day-Night Average Level (L_{dn} or DNL), which is a 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013). Noise levels described by DNL and CNEL usually differ by about 0.5 dBA. Quiet suburban areas typically have a CNEL in the range of 40 to 50 dBA, while areas near arterial streets are typically in the 50 to 70+ CNEL range.

Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent buildings or structures and vibration energy may propagate through the buildings or structures. Vibration may be felt, may manifest as an audible low-frequency rumbling noise (referred to as groundborne noise), and may cause windows, items on shelves, and pictures on walls to rattle. Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants at vibration-sensitive land uses and may cause structural damage.

Typically, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. Vibration amplitudes are usually expressed in peak particle velocity (PPV). The PPV velocity is normally described in inches per second (in/sec). PPV is

defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used as it corresponds to the stresses that are experienced by buildings (Caltrans 2020).

High levels of groundborne vibration may cause damage to nearby building or structures; at lower levels, groundborne vibration may cause minor cosmetic (i.e., non-structural damage) such as cracks. These vibration levels are nearly exclusively associated with high impact activities such as blasting, pile-driving, vibratory compaction, demolition, drilling, or excavation.

Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. According to the Mountain View General Plan Noise Element, noise-sensitive uses include but are not limited to residences, schools, churches, and hospitals (City of Mountain View 2012).

Vibration-sensitive receptors, which are similar to noise-sensitive receptors, include residences and institutional uses, such as hospitals, schools, and churches. However, vibration-sensitive receptors also include buildings where vibrations may interfere with vibration-sensitive equipment that is affected by vibration levels that may be well below those associated with human annoyance (e.g., recording studios or medical facilities with sensitive equipment). Other features that may have particular sensitivity to groundborne vibration include historic sites and structures.

Existing Conditions

Noise Sources

The major existing noise source in Mountain View is vehicle traffic. Specifically, U.S. Highway 101, State Highway (SR) 85, SR 237 and SR 82 (El Camino Real) as well as local roadways such as Central Expressway generate the most continuous, high noise levels. Other noise sources include the Valley Transportation A light rail and Caltrain rail operations, which can include warning bells and required horn blasts at at-grade crossings. Aircraft operations from Palo Alto Airport and Moffett Field also contribute to the noise environment of Mountain View.

4.10.2 Regulatory Setting

a. Federal Regulations

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 EPA. 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 not addressed further in this analysis.

b. State Regulations

California Building Code, Title 24, Part 2, Section 1206.4

According to the 2019 California Building Code (CBC), Title 24, Part 2, Section 1206.4 (Allowable Interior Noise Levels) of the California Code of Regulations, interior noise levels attributable to exterior sources shall not exceed 45 CNEL in any habitable room. A habitable room is typically a residential room used for living, sleeping, eating, or cooking. Bathrooms, closets, hallways, utility spaces, and similar areas are not considered habitable rooms for this regulation.

c. Local Regulations

City of Mountain View 2030 General Plan

The City of Mountain View's 2030 General Plan Noise Element contains goals and policies designed to include noise control in the planning process to maintain compatible land uses with acceptable environmental noise levels and protect Mountain View residents from excessive noise. The Noise Element of the General Plan includes the following policies related to noise:

Goal NOI-1: Noise levels that support a high quality of life in Mountain View.

Policy NOI 1.1: Land use compatibility. Use the Outdoor Noise Environment Guidelines as a guide for planning and development decisions (Table 4.10-1, illustrated below).

Policy NOI 1.2: Noise-sensitive land uses. Require new development of noise-sensitive land uses to incorporate measures into the project design to reduce interior and exterior noise levels to the following acceptable level.

- New single-family developments shall maintain a standard of 65 dBA Ldn for exterior noise in private outdoor active use areas.
- New multi-family residential developments shall maintain a standard of 65 dBA Ldn for private and community outdoor recreation use areas. Noise standards do not apply to private decks and balconies in multi-family residential development.
- Interior noise levels shall not exceed 45 dBA Ldn in all new single-family and multifamily residential units.
- Where new single-family and multi-family residential units would be exposed to intermittent noise from major transportation sources such as train or airport operations, new construction shall achieve an interior noise level of 65 dBA through measures such as site design or special construction materials. This standard shall apply to areas exposed to four or more major transportation noise events such as passing trains or aircraft flyovers per day.

Policy NOI 1.3: Exceeding acceptable noise thresholds. If noise levels in the area of a proposed project would exceed normally acceptable thresholds, the City shall require a detailed analysis of proposed noise reduction measures to determine whether the proposed use is compatible. As needed, noise insulation features shall be included in the design of such projects to reduce exterior noise levels to meet acceptable thresholds, or for uses with no active outdoor use areas, to ensure acceptable interior noise levels.

Policy NOI 1.4: Site planning. Use site planning and project design strategies to achieve the noise level standards in NOI 1.1 (Land use compatibility) and in NOI 1.2 (Noise-sensitive land uses). The use of noise barriers shall be considered after all practical design-related noise measures have been integrated into the project design.

Policy NOI 1.5: Major roadways. Reduce the noise impacts from major arterials and freeways.

Policy NOI 1.6: Minimize noise impacts on noise-sensitive land uses, such as residential uses, schools, hospitals and child-care facilities.

Policy NOI 1.7: Stationary sources. Restrict noise levels from stationary sources through enforcement of the Noise Ordinance.

Policy NOI 1.8: Moffett Federal Airfield. Support efforts to minimize noise impacts from Moffett Federal Airfield in coordination with Santa Clara County's Comprehensive Land Use Plan.

Policy NOI 1.9: Rail. Reduce the effects of noise and vibration impacts from rail corridors

Table 4.10-1 Outdoor Noise Environment Guidelines

	Community Noise Exposure (CNEL) Day/Night Average Noise Level in Decibels (Ldn)			
Land Use Category	**Normally Acceptable**	**Conditionally Acceptable**	**Normally Unacceptable**	**Clearly Unacceptable**
Residential – Single-Family, Duplex, Mobile Homes	50-55	55-70	70-75	75-85
Residential – Multifamily, Transient Lodging – Motels, Hotels	50-60	60-70	70-75	75-85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50-60	60-70	70-80	80-85
Auditoriums, Concerts, Halls, Amphitheaters, Sports Area, Outdoor Spectator Sports	50-70	–	–	70-85
Playgrounds, Neighborhood Parks	50-67.5	–	67.5-75	75-85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50-70	–	70-80	80-85
Office Buildings, Businesses – Commercial and Professional	50-67.5	67.5-75	75-85	–
Industrial, Manufacturing Utilities, Agriculture	50-70	70-80	80-85	–

Source: Mountain View, 2012

N/A = not applicable

City of Mountain View City Code

The City of Mountain View addresses noise regulations to help protect the community from exposure to excessive noise and also specify how noise is measured and regulated. The City's codes address noise issues and protect the community from exposure to excessive noise from sources such as construction activity, animals, amplified sound and stationary equipment. These codes specify how noise is measured and regulated. The City's Zoning Ordinance also includes noise regulations and standards for uses such as drive-in and drive-through sales, commercial, and industrial land uses and sensitive uses, such as child-care centers. In addition, noise is regulated through project conditions of approval. The Mountain View Police Department and the City Attorney's office enforce noise violations.

Section 8.70.1 of the City's Code restricts the hours of construction activity to 7:00 a.m. to 6:00 p.m., Monday through Friday. No construction activity is permitted on Saturday, Sunday, or holidays without written approval from the City. Authorized land uses and construction activity established through the discretionary land use permit process may be subject to specific noise conditions of approval that may be more restrictive. Construction activities are defined to include any physical activity on the construction site or in the project's staging area, including the delivery of materials.

Section 21.26 of the City's Code establishes quantitative noise level limits on noise from stationary equipment (such as heating, ventilation, and air conditioning mechanical systems, and air compressors). The maximum allowable noise level is 55 dBA during the day and 50 dBA at night (10:00 p.m. to 7:00 a.m.) at a residential receiving property, unless it has been demonstrated that such operation will not be detrimental to the health, safety, peace, morals, comfort or general welfare of the residents subjected to such noise, and the use has been granted a permit by the Zoning Administrator.

City of Mountain View Standard Conditions of Approval

As part of discretionary review, the City has standard conditions for different types of approvals in the City of Mountain View Housing Element Update – Draft EIR (Mountain View 2022). The City has standard conditions of approval (COA) relating to noise and vibration, as summarized below.

Vibration and Settlement Plan for Projects Adjacent to Historic Structures or Zero-Lot-Line Structures

At building permit submittal, the applicant shall prepare a Vibration and Settlement Plan which specifies monitoring and mitigation measures to avoid damage to the adjacent building(s) as a result of Project construction. Approved monitoring protocols shall be in place prior to issuance of any building permits for the Project

Rooftop Equipment Screen

All rooftop equipment must be concealed behind opaque (solid) screening designed to complement the building design such that rooftop equipment is not visible from any elevation. Details of the rooftop equipment and roof screens shall be included in the building permit drawings and approved by the Zoning Administrator.

Mechanical Equipment - Ground Screening

All mechanical equipment, such as air condenser (AC) units or generators, shall be concealed behind opaque screening. No mechanical equipment is permitted on front porches or balconies but may be located in the fenced yard area or building rooftops

Mechanical Equipment – Noise

The noise emitted by any mechanical equipment shall not exceed a level of 55 dB(A) during the day or 50 dB(A) during the night, 10:00 p.m. to 7:00 a.m., when measured at any location on the adjoining residentially used property.

Interior Noise Levels

Construction drawings must confirm that measures have been taken to achieve an interior noise level of 45 dB(A)L_{dn} that shall be reviewed and approved by a qualified acoustical consultant prior to building permit submittal.

Construction Noise Reduction Measures

The following noise reduction measures shall be incorporated into construction plans and contractor specifications to reduce the impact of temporary construction-related noise on nearby properties: (a) comply with manufacturer's muffler requirements on all construction equipment engines; (b) turn off construction equipment when not in use, where applicable; (c) locate stationary equipment as far as practical from receiving properties; (d) use temporary sound barriers or sound curtains around loud stationary equipment if the other noise reduction methods are not effective or possible; and (e) shroud or shield impact tools and use electric-powered rather than diesel-powered construction equipment.

Work Hours/Construction Site Signage

No work shall commence on the job site prior to 7:00 a.m. nor continue later than 6:00 p.m., Monday through Friday, nor shall any work be permitted on Saturday or Sunday or any holiday unless prior approval is granted by the Chief Building Official. The general contractor, applicant, developer, or property owner shall erect a sign at all construction site entrances/exits to advise subcontractors and material suppliers of the working hours and contact information, including an after-hours contact. Violation of this condition of approval may be subject to the penalties outlined in Section 8.6 of the City Code and/or suspension of building permits.

Construction Parking

The applicant shall prepare a construction parking management plan to address parking demands and impacts during the construction phase of the Project by contractors or other continued operations on-site. The plan shall also include a monitoring and enforcement measure which specifies on-street parking is prohibited and will be monitored by the owner/operator of the property (or primary contractor), and penalties will be enforced by the owner/operator of the property (or primary contractor) for violations of on-street parking restrictions. Violations of this provision may result in a stop-work notice being issued by the City for development project. The construction parking management plan shall be subject to review and approval by the Zoning Administrator prior to the issuance of building permits.

Notice of Construction

The applicant shall notify neighbors within at least 300 feet of the Project site of the construction schedule in writing, prior to construction. For multi-phased construction, separate notices may be required for each phase of construction. A copy of the notice and the mailing list shall be submitted for review prior to issuance of building permits.

Disturbance Coordinator

The applicant shall designate a "disturbance coordinator" who will be responsible for responding to any local complaints regarding construction noise. The coordinator (who may be an employee of the general contractor) will determine the cause of the complaint and will require that reasonable measures warranted to correct the problem be implemented. A telephone number of the noise

disturbance coordinator shall be conspicuously posted at the construction site fence and on the notification sent to neighbors adjacent to the site. The sign must also list an emergency after-hours contact number for emergency personnel.

Vibration Best Management Practices Construction Measures

- Avoid impact pile driving and drill piles instead where possible. Drilled piles cause lower vibration levels where geological conditions permit their use.
- Avoid using vibration rollers and tampers near sensitive areas. In areas where Project construction is anticipated to include vibration generating activities, vibration studies shall be conducted to determine the areas of impact and to present appropriate mitigation measures that may include the following:
  - Identification of sites that would be exposed to Project vibration compaction activities and could result in vibration impacts to structures;
  - Develop a vibration monitoring and contingency plan;
  - Construction contingency plan; and
  - Conduct post-survey on structures where either monitoring has indicated high levels or complaints of damage have been made.

4.10.3 Impact Analysis

Methodology and Thresholds of Significance

Methodology

As discussed in Chapter 2, *Project Description*, the Proposed Project consists of amendments to the City's General Plan, Zoning Code, Zoning Map, and various Precise Plans. In addition to expanding residential development opportunities and promoting the City's design priorities. The following discussion describes the methodology used to evaluate the significance of potential noise and vibration impacts related to the forecasted construction and operation of the Proposed Project.

CONSTRUCTION NOISE

The primary source of temporary noise associated with the Proposed Project would be construction activities associated with housing development on the selected sites. Construction equipment can be considered to operate in two modes: stationary and mobile. Stationary equipment operates in a single location for one or more days at a time, with either fixed-power operation (e.g., pumps, generators, and compressors) or variable-power operation (e.g., pile drivers, rock drills, and pavement breakers). Mobile equipment moves around a construction site with power applied in cyclic fashion, such as bulldozers, graders, and loaders (FTA 2018). Each phase of construction has its own noise characteristics due to specific equipment mixes; some will have higher continuous noise levels than others and some may have high-impact intermittent noise levels (FTA 2018). Therefore, construction noise levels may fluctuate depending on the type of equipment being used, construction phase, or equipment location. In typical construction projects on vacant sites, grading activities typically generate the highest noise levels because grading involves the largest equipment and covers the greatest area. Foundation excavation and construction is often the second loudest phase, followed by paving and building construction.

Variation in power imposes additional complexity in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle, or percent of operational time, of the activity to determine the L_{eq} of the operation (FTA 2018).

For assessment purposes, noise levels for common construction equipment provided in the FTA *Transit Noise and Vibration Impact Assessment* (2018) guidance document were used to analyze potential noise levels associated with future development under the Proposed Project. The FTA provides typical noise levels at 50 feet from various types of equipment. Construction noise was also estimated using the FHWA's Roadway Construction Noise Model (RCNM) (2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, construction noise levels were estimated at a distance of 50 feet from future development.

ON-SITE OPERATIONAL NOISE

Stationary and other sources of noise in Mountain View include those associated with the standard operation of land uses. The Project would facilitate the development of residential land uses, along with a small amount of commercial. Sources of noise from commercial uses could include but are not limited to operation of equipment or vehicles, amplified music, or people's voices. Sources of noise from residential uses could include but are not limited to landscape and building maintenance activities, stationary mechanical equipment (e.g., pumps and HVAC units), garbage collection activities, and other stationary and area sources such as people's voices and amplified music.

OFF-SITE OPERATIONAL NOISE

On June 30, 2020, the City Council of Mountain View passed Resolution 18484 that established the City's implementation policy for SB 743. This resolution replaced level of service with VMT as the primary metric for CEQA transportation analyses. Under Mountain View's VMT policy, projects located within traffic analysis zones already performing at or below a 15 percent below-average VMT threshold are generally eligible for streamlined CEQA review, provided the proposed land use and scale align with existing neighborhood conditions. For traffic noise impacts, this metric will be used to determine traffic noise impacts, as a reduction in VMT would represent a reduction traffic, and therefore less traffic noise.

GROUNDBORNE VIBRATION

Development carried out under the Proposed Project would not include substantial vibration sources associated with operation. Construction activities have the greatest potential to generate groundborne vibration affecting nearby noise-sensitive receptors. Construction vibration levels that could occur due to development carried out under the Proposed Project are based on reference vibration levels published by the FTA.

AIRPORT NOISE

The airport noise contours for Moffett Field Airport with respect to the location of housing opportunity sites were utilized to determine potential impacts from exposure to airport-related noise.

IMPACT OF THE ENVIRONMENT ON THE PROJECT

As a result of the Supreme Court decision regarding the assessment of the environment's impacts on projects (*California Building Industry Association [CBIA] v. Bay Area Air Quality Management District [BAAQMD]*, 62 Cal. 4th 369 [No. S 213478] issued December 17, 2015), it is generally not considered the purview of the CEQA process to evaluate the impact of existing environmental conditions on a proposed project. Therefore, this environmental analysis does not consider the potential impacts of the environment (i.e., existing noise) on the Project.

Significance Thresholds

To determine whether a project would result in a significant impact to noise, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

1. 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;
2. Generate excessive groundborne vibration or groundborne noise levels; or
3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

The following discussion identifies specific thresholds used to analyze the general CEQA thresholds listed above.

CONSTRUCTION NOISE

Development carried out under the Proposed Project could have a significant impact if temporary construction noise during permitted daytime hours exposed noise-sensitive receivers to significantly adverse noise levels, or if construction noise occurred outside the hours detailed in Mountain View Code Section 8.70.1.

OPERATIONAL NOISE

On-site activities at new development facilitated by the Proposed Project would have a significant impact if it would expose neighboring noise-sensitive land uses to noise levels exceeding the City's standards as stated in Section 21.26 of the MVMC, which are a maximum allowable noise level of 55 dBA during the day and 50 dBA at night (10:00 p.m. to 7:00 a.m.) at a residential receiving property.

GROUNDBORNE VIBRATION

The City's Code or General Plan does not have vibration thresholds. Therefore, this analysis applies the following vibration thresholds established by the FTA for potential structural damage to buildings. The FTA thresholds in Table 4.10-2 are used to assess the potential structural damage to buildings from construction vibration. A significant impact would be identified if construction facilitated by the Project would generate excessive vibration levels at surrounding receptors. Groundborne vibration levels exceeding 0.12 in/sec PPV would have the potential to result in cosmetic damage to buildings extremely susceptible to vibration damage (i.e., historic buildings), and groundborne vibration levels exceeding 0.2 in/sec PPV would have the potential to result in cosmetic damage to non-engineered timber and masonry buildings (i.e., residential buildings).

Table 4.10-2 Vibration-Related Building Damage Thresholds

Building Category		PPV (in/sec)
I.	Reinforced-concrete, steel or timber (no plaster)	0.5
II.	Engineered concrete and masonry (no plaster)	0.3
III.	Non-engineered timber and masonry buildings	0.2
IV.	Buildings extremely susceptible to vibration damage	0.12

PPV = peak particle velocity
in/sec = inches per second
L_v = root mean square velocity in decibels (VdB) re 1 micro-inch/second
Source: FTA 2018

Project Impacts

Threshold 1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact NOI-1 CONSTRUCTION OF INDIVIDUAL DEVELOPMENT FACILITATED BY THE PROJECT WOULD TEMPORARILY PRODUCE HIGH NOISE LEVELS, POTENTIALLY AFFECTING NEARBY NOISE-SENSITIVE LAND USES. OPERATION OF DEVELOPMENT FACILITATED BY THE PROJECT WOULD ALSO INCREASE TRANSPORTATION NOISE. WITH IMPLEMENTATION OF THE CITY OF THE MOUNTAIN VIEW'S STANDARD CONDITIONS OF APPROVAL AND MITIGATION MEASURE NOI-1, IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Construction

Construction activity associated with future development on the Proposed Project would generate temporary noise in the vicinity of the sites, exposing surrounding sensitive receptors to increased noise levels. Project construction noise would be generated by heavy-duty diesel construction equipment used for typical construction activities such as demolition, site preparation, grading, building construction, paving, and architectural coating activities. Each phase of construction has a specific equipment mix and associated noise characteristics, depending on the equipment used during that phase. Construction noise would typically be higher during the more equipment-intensive phases of initial construction (i.e., site preparation and grading work) and would be lower during the later construction phases (i.e., building construction and paving). Typical construction equipment noise levels are shown in Table 4.10-3. In some instances, multiple pieces of equipment may operate simultaneously, generating overall noise levels that are incrementally higher than what is shown in the table.

Table 4.10-3 Construction Equipment Noise Levels

Equipment	Typical Noise Level (dBA) at 50 Feet from Source
Air Compressor	80
Backhoe	80
Caisson Drill	88
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Derrick	88
Crane, Mobile	83
Dozer	85
Generator	82
Grader	85
Jackhammer	88
Loader	80
Paver	85
Pile-driver (Impact)	101
Pile-driver (Sonic)	95
Pneumatic Tool	85
Pump	77
Roller	85
Saw	76
Scarifier	83
Scraper	85
Shovel	82
Truck	84

Sources: FTA 2018

As shown in Table 4.10-3, at an average distance of 50 feet throughout a typical construction day to a nearby sensitive receptors, construction noise levels using either a sonic or impact pile driver could reach approximately 95 to 101 dBA L_{eq}. Pile-drivers are used to install deep foundation piers and are not typically used for construction of residential or commercial development. However, project-level details are not currently available for future projects that would be facilitated by the Proposed Project, and it cannot be guaranteed that future construction would not involve use of a pile-driver. Therefore, this sound level is considered to provide a conservative analysis. Accordingly, construction noise associated with buildout facilitated by the Project may temporarily disturb noise-sensitive land uses.

The following City of Mountain View standard COA (Mountain View 2022), described above in Section 4.10.2, Regulatory Setting, would be applied to development facilitated by the Proposed Project and would reduce potential impacts related to construction noise:

- Construction Noise Reduction Measures
- Work Hours/Construction Site Signage
- Construction Parking
- Notice of Construction
- Disturbance Coordinator

Without implementation of COAs, construction noise could generate noise levels of up to 101 dBA L_{eq} if pile drivers are used and up to 88 dBA L_{eq} if typical heavy construction equipment is used at the nearby sensitive receptor property lines. The City of Mountain View applies Standard COAs (Mountain View 2022), described above, to development projects. Implementation of the Standard COAs would require the use of several noise reduction measures including resident notification, a noise complaint hotline, and noise attenuation measures (e.g. properly maintained construction equipment and mufflers, the use of sound walls, the application of shrouds to impact tools or the use of electric powered tools in lieu of diesel power). The COAs would be required for each project. In addition, construction would be limited to hours allowed by the City's Code Section 15-105(d). With the implementation of COAs, impacts from typical heavy construction equipment would be less than significant. With implementation of the City's Standard COAs and Mitigation Measure NOI-1, impacts to construction noise would be less than significant. However, if development facilitated by the Project would exceed City standards then project-specific CEQA review would be required, which may require project specific mitigation measures to reduce noise.

Operation

Operational Noise

Stationary and other sources of noise in Mountain View include those associated with the standard operation of land uses. These sources could include, but are not limited to, landscape and building maintenance activities, stationary mechanical equipment (e.g., pumps and HVAC units), garbage collection activities, and other stationary and area sources such as people's voices and amplified music. Noise generated by residential uses are generally short-term and intermittent in nature. The Project would provide for an increase in residential development throughout the city. Residential development tends to have lower noise levels associated than other uses, such as industrial or commercial uses.

The City of Mountain View applies Standard COAs (Mountain View 2022), described above, to development projects. The following Standard COAs, which are consistent with policies found in the Noise Element of the General Plan, would be applied to the Project, effectively reducing stationary operational noise levels to below the City's allowable noise level of 55 dBA during the daytime (7:00 a.m. to 10:00 p.m.) and 50 dBA at nighttime (10:00 p.m. to 7:00 a.m.) at a residential receiving property:

- Rooftop Equipment Screening
- Mechanical Equipment - Ground Screening
- Mechanical Equipment - Noise

Implementation of the standard COAs would reduce noise associated with new stationary noise sources to below acceptable noise standards. Implementation of the COAs would require the use of noise reduction measures such as mechanical equipment screening to reduce on-site noise levels.

Additionally, the COAs require that stationary operational noise would not exceed the City's daytime noise standard of 55 dBA or nighttime noise standard of 50 dBA.

Delivery and Trash Trucks

The Project would require periodic delivery and trash-hauling services. However, noise associated with delivery and trash-hauling trucks would be an intermittent noise source and are already a common occurrence in the Project area due to existing residences that make up the developed urban area. Therefore, such services associated with the Project would not result in a substantial permanent increase in ambient noise levels.

Additional operational on-site noise sources such as landscape maintenance, parking lot noise, entering/exiting vehicles, and conversations would be typical of noise generated by existing land uses nearby the proposed R3 Zoning District Update sites and would not substantially contribute to overall ambient noise levels. Furthermore, if subterranean parking structures are utilized, they would be enclosed with concrete walls that would act as a barrier to minimize any substantial noise from circulating vehicles to transmit to the exterior.

Future Residents

In addition to mechanical equipment, the Project would generate noise from people gathering at the Project site. Typically, a conversation between two people using a normal voice (not raised) at a distance of three feet is 60 dBA (Engineering ToolBox 2005). No amplified sound is proposed at gathering locations, and speech from conversations would quickly dissipate and would not interfere with surrounding outdoor activities and noise-sensitive uses. Furthermore, pursuant to Assembly Bill 1307 (2023), the effect of noise generated by residential project occupants and their guests is not a significant effect on the environment.

Traffic Noise

The Project would facilitate future residential development that could have potential to result in VMT increases. Increases in VMT could increase traffic noise. The City of Mountain View's VMT significance threshold for VMT for individual developments is 15 percent below the existing VMT rate for Mountain View. As stated in Section *4.13, Transportation,* increases in development density reduces VMT generation in the area. Based on the increased allowable densities proposed as part of the Project, it is anticipated the Project could facilitate a citywide VMT reduction of approximately 30 percent, which exceeds the City's threshold of 15 percent below the existing VMT rate for Mountain View. Therefore, as the Project would decrease VMT by an amount that doubled the City's required reduction, the Project would not result in an increase in traffic noise compared to if development occurred without the Project.

Mitigation Measures

NOI-1 Pile Driving Noise Reduction

If pile driving activities are proposed within 50 feet of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental health care facilities, places of worship, libraries and museums, transient lodging, and office building interiors) the following measures shall be implemented:

- The Project applicant shall prepare a pile driving noise reduction plan, which shall be submitted to the City for approval prior to the start of construction. The plan will include but is not limited to the following measures: With approval of the Project structural engineer, pile holes will be pre-drilled to minimize the number of impacts necessary to seat the pile.
- Pile driving shall be scheduled to have the least impact on nearby sensitive receptors, where feasible (e.g., operating during mid-day hours, avoiding operation during school hours, etc.).
- Pile drivers with the best available noise control technology will be used. For example, pile driving noise control may be achieved by shrouding the pile hammer point of impact, by placing resilient padding directly on top of the pile cap, and/or by reducing exhaust noise with a sound-absorbing muffler.
- Alternatives to impact hammers, such as caisson drilling (drilling piles), vibratory pile driving, oscillating or rotating pile installation methods, and jetting or partial jetting of piles into place using a water injection at the tip shall be used, where feasible.

Significance After Mitigation

Implementation of the City's Standard COAs and Mitigation Measure NOI-1 would reduce potential impacts from noise during construction and operation to less than significant levels by reducing noise source impacts and creating sound barriers where required/necessary. Therefore, impacts would be less than significant with mitigation measures. If compliance with the City standards is not possible, then project-specific CEQA would be required with project specific mitigation measures.

Threshold 2:	Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Impact NOI-2 CONSTRUCTION OF INDIVIDUAL DEVELOPMENT FACILITATED BY THE PROJECT COULD TEMPORARILY GENERATE GROUNDBORNE VIBRATION, POTENTIALLY AFFECTING ADJACENT SENSITIVE LAND USES. EVEN WITH IMPLEMENTATION OF THE CITY OF MOUNTAIN VIEW STANDARD COAS AND MITIGATION MEASURE NOI-2, IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Construction

The construction of individual development facilitated by the Proposed Project could intermittently generate strong vibration on and adjacent to construction sites. Typical construction equipment that produces vibration include pile drivers, vibratory rollers for paving, caisson drills, bulldozers, loaded trucks, and jackhammers. Table 4.10-4 lists groundborne vibration levels from various types of construction equipment at various distances.

Table 4.10-4 Vibration Levels for Typical Construction Equipment

Equipment		Approximate Vibration Level (in/sec PPV)			
		25 feet from Source	50 feet from Source	100 feet from Source	200 feet from Source
Caisson Drilling		0.089	0.031	0.011	0.004
Jackhammer		0.035	0.012	0.004	0.002
Large Bulldozer		0.089	0.031	0.011	0.004
Loaded Truck		0.076	0.027	0.010	0.003
Pile Driver (impact)	Upper range	1.519	0.537	0.190	0.067
	Typical	0.644	0.228	0.081	0.028
Pile Driver (sonic)	Upper range	0.734	0.260	0.092	0.032
	Typical	0.170	0.060	0.021	0.008
Small Bulldozer		0.003	0.001	<0.001	<0.001
Vibratory Roller		0.21	0.074	0.026	0.009

Source: FTA 2018

Based on Table 4.10-4, buildings and structures could experience the strongest vibration during the use of pile-drivers and vibratory rollers. Pile-drivers are used to install deep foundation piers and vibratory rollers are used to compact soil, gravel, or asphalt. Pile-drivers and vibratory rollers are not used for every construction project, and other equipment may be used to achieve the same construction functions.

In terms of impacting residents, compliance with MVMC Section 8.70.1 would protect residents from exposure to vibration during normal sleeping hours, as the code restricts construction to daytime hours. In terms of impacting structures, the threshold for historic structures is 0.12 in/sec PPV, and the threshold for non-historic buildings at 0.2 in/sec PPV (FTA 2018). As shown in Table 4.10-4, vibration levels associated with pile-drivers and vibratory rollers operating at a distance of 25 feet could exceed the threshold for non-historic structures and pile-drivers operating at a distance of up to 100 feet could exceed the threshold for historic and non-historic structures. Table 4.10-5 summarizes the distances at which construction equipment would exceed vibration thresholds.

Table 4.10-5 Distances at Which Vibration Levels for Typical Construction Equipment Exceed Vibration Thresholds

Equipment	Distance (feet) at Which Vibration Level (in/sec PPV) Exceeds Threshold[1]		
	Historic Structures	Timber/Masonry Buildings[2]	Engineered Concrete/ Masonry Buildings
Pile-Driver	135 feet	100 feet	75 feet
Vibratory Roller	40 feet	25 feet	25 feet
Dozer/Large Earthmoving Equipment	20 feet	15 feet	15 feet

[1] The threshold for historic structures is 0.12 in/sec PPV, and the threshold for non-historic buildings at 0.2 in/sec PPV (FTA 2018).

[2] Most residential buildings consist of non-engineered timber/masonry buildings.

In/sec PPV = inches per second peak particle velocity

Because most development sites of the Proposed Project are located near or adjacent to existing structures, it is possible that construction of development facilitated by the Project could generate vibration that exceeds applicable thresholds. Accordingly, future construction facilitated by the Project may exceed applicable groundborne vibration thresholds if equipment such as a pile driver, vibratory roller, or large earthmoving equipment like a dozer are used within the distances shown in Table 4.10-5. Therefore, without measures to reduce vibration, construction vibration could exceed the 0.2 in/sec PPV threshold for structural damage to nearby residential structures and the 0.3 in/sec PPV threshold for structural damage to nearby commercial buildings. The following City of Mountain View Standard COAs (Mountain View 2022), described above, would be applied to future development facilitated by the Proposed Project and would reduce potential impacts related to construction vibration:

- Vibration and Settlement Plan for Projects Adjacent to Historic Structures or Zero-Lot-Line Structures
- Vibration Best Management Practices Construction Measures

Without implementation of COAs, groundborne vibration could generate noise levels exceeding the FTA standards at the nearby sensitive receptor structures. The City of Mountain View applies Standard COAs (Mountain View 2022), described above, to development projects. Implementation of the COAs would require the use of several vibration reduction measures including the use of less vibration intensive construction equipment (e.g. drilled piles in lieu of pile driving), developing a vibration monitoring and contingency plan to identify risks prior to construction and conducting post-surveys on structures where high levels of vibration have been indicated or complaints of damage have occurred. However, project-level details are not currently available for future projects that would be facilitated by the Proposed Project. Therefore, it is not possible to determine exact noise levels, locations, or time periods for construction of such projects, or construction noise at adjacent properties. Construction vibration levels associated with future projects may exceed the FTA's standards for vibration damage and Mitigation Measure NOI-2 is required. With implementation of the City's Standard COAs and Mitigation Measure NOI-1, impacts to construction vibration would be less than significant. However, if development facilitated by the Project would exceed City standards then project-specific CEQA review would be required, which may require project specific mitigation measures to reduce vibration.

Operation

The Project would facilitate residential and commercial development, which typically do not generate substantial vibration during operation. Therefore, Project operational vibration impacts would be less than significant.

Mitigation Measure

NOI-2 Pile Driver Vibration Reduction Measures

If pile driving activities are proposed within 135 feet of an historic structure or 100 feet from a timber/masonry structure (residential building) or Engineered Concrete/Masonry structure (commercial building), the following measures shall be implemented:

- The Project applicant shall retain a qualified consultant to prepare a project-specific construction vibration impact analysis.

- Pile driving vibration shall not exceed 0.12 in/sec PPV at buildings extremely susceptible to vibration damage (i.e., historic buildings); groundborne vibration levels exceeding 0.2 in/sec PPV at non-engineered timber and masonry buildings (i.e., residential buildings) and engineered Concrete/Masonry structure (commercial building).
- Provided the analysis concludes vibration levels do not exceed 0.12 in/sec PPV at buildings extremely susceptible to vibration damage (i.e., historic buildings); groundborne vibration levels exceeding 0.2 in/sec PPV at non-engineered timber and masonry buildings (i.e., residential buildings) or engineered Concrete/Masonry structure (commercial building), construction may proceed without additional measures.
- Provided the analysis concludes that pile driving vibration levels exceed 0.12 in/sec PPV at buildings extremely susceptible to vibration damage (i.e., historic buildings); groundborne vibration levels exceeding 0.2 in/sec PPV at non-engineered timber and masonry buildings (i.e., residential buildings) or engineered Concrete/Masonry structure (commercial building), additional measures shall be implemented to reduce vibration levels below the standard, as determined by the qualified consultant. These measures may include, but not be limited to, pre-drilling pile holes, utilizing a vibratory pile driver, or performing pile driving at a further distance from the noise-sensitive land use to reduce vibration levels.
- The analysis of nighttime pile driving vibration shall be completed in accordance with industry standards. The analysis shall consider the type of pile driver to be used and potential vibration levels at vibration-sensitive receivers located within 160 feet of the R3 Zoning District Update Site.

Significance After Mitigation

With implementation of the City's Standard COAs and Mitigation Measure NOI-2, potential impacts from vibration levels during pile driving activity would be reduced to below FTA's significance threshold of 0.12 in/sec PPV at buildings extremely susceptible to vibration damage (i.e., historic buildings); groundborne vibration levels exceeding 0.2 in/sec PPV at non-engineered timber and masonry buildings (i.e., residential buildings) or engineered Concrete/Masonry structure (commercial building). If compliance with the City standards is not possible, then project-specific CEQA would be required with project specific mitigation measures.

Threshold 3:	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Impact NOI-3 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD NOT BE WITHIN AIRPORT NOISE CONTOURS; THEREFORE, DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD NOT BE EXPOSED TO EXCESS NOISE LEVELS ASSOCIATED WITH AIRPORTS AND THERE WOULD BE NO IMPACT.

The Moffett Field Airport is the closest airport, located approximately 0.4 miles to the northeast of the nearest R3 Zoning District Update site. While some of the proposed zoning districts would be located within the airport influence area, all of the housing sites would be located outside the 60 dBA CNEL noise contour (Mountain View 2012). None of the R3 Zoning District Update site are within the vicinity of a private airstrip. Therefore, construction workers, users, or employees of the Project would not experience substantial noise exposure from airport noise, and there would be no impact.

Mitigation Measure

Impacts would be less than significant and no mitigation is required

4.10.4 Cumulative Impacts

IMPACT NOI-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD NOT RESULT IN A CUMULATIVELY SIGNIFICANT INCREASE IN CONSTRUCTION NOISE, WOULD NOT RESULT IN SIGNIFICANT CUMULATIVE OPERATIONAL NOISE FROM ON-SITE OR OFF-SITE SOURCES, WOULD NOT CAUSE A CUMULATIVELY SIGNIFICANT GROUNDBORNE VIBRATION IMPACT, AND WOULD NOT RESULT IN A CUMULATIVELY CONSIDERABLE AIRPORT-RELATED NOISE IMPACT. WITH IMPLEMENTATION OF THE CITY'S STANDARD CONDITIONS OF APPROVAL AND MITIGATION MEASURES NOI-1 AND NOI-2, CUMULATIVE NOISE IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION, AND THE CONTRIBUTION OF THE PROJECT WOULD NOT BE CUMULATIVELY CONSIDERABLE.

Construction Noise

Construction noise generated by projects carried out under the Proposed Project, in combination with construction activities for other cumulative projects that may be constructed simultaneously could substantially increase noise levels in the vicinity of future projects. The City of Mountain View Standard COAs and Mitigation Measure NOI-1 have been identified by the City to help reduce construction noise from future development facilitated by the Proposed Project. Unless construction of cumulative projects, including those carried out under the Proposed Project, occur in close proximity to each other and simultaneously, noise from individual construction projects has a small chance of combining to create significant cumulative impacts. Although this scenario is unlikely, and policies, actions, and mitigation would be implemented to the extent feasible, the potential remains for a cumulatively considerable increase in construction noise from projects carried out under the Proposed Project. Furthermore, development facilitated by the Proposed Project would be required to implement the City of Mountain View Standard COAs and Mitigation Measure NOI-1 and would, therefore, not result in a substantial contribution to a cumulative impact. Therefore, cumulative construction noise impacts would be less than significant with mitigation.

On-Site Operational Noise

Development facilitated by the Proposed Project would introduce new stationary noise sources to the ambient noise environment in and around the Proposed Project, including new mechanical ventilation equipment. These sources may combine with noise from other nearby cumulative projects to result in higher noise levels. However, operational noise from these sources is localized and rapidly attenuates within an urbanized setting due to the effects of intervening structures and topography that block the line of sight, and due to other noise sources closer to receptors that obscure project-related noise. Implementation of the City of Mountain View noise standards of 55 dBA for daytime and 50 dBA for nighttime would ensure that noise from new stationary sources as part of cumulative development would be within acceptable levels. Therefore, the cumulative impact related to operational stationary noise would be less than significant.

Off-Site Operational Noise

As discussed in Impact NOI-1, the Project's addition to traffic would not result in a significant off-site traffic noise increase; thus, the Project's traffic noise increase would not be cumulatively considerable. No cumulative operational noise impacts would occur.

Groundborne Vibration

Although there could be other cumulative projects simultaneously under construction near a development project carried out under the proposed project, the potential for construction groundborne vibration and noise impacts exists within a limited area (e.g., within approximately 25 feet for a vibratory roller). Two construction cumulative projects within 25 feet of a given sensitive structure would be unlikely; therefore, a significant cumulative impact related to vibration from construction is not anticipated. Furthermore, development facilitated by the Proposed Project would be required to implement the City of Mountain View Standard COAs and Mitigation Measure NOI-2 and would, therefore, not result in a substantial contribution to a cumulative impact. Therefore, cumulative groundborne vibration impacts would be less than significant with mitigation.

Airport Noise

Aircraft-related noise impacts occur largely in the vicinity of airports or airstrips. Although citywide growth could increase the number of people who are exposed to overhead aircraft-related noise impacts, such impacts would be localized in nature. In addition, new residential development would not result in a direct increase to aircraft operations that would increase noise exposure to aircraft overflight patterns within and outside the city. The Proposed Project would have no contribution to any cumulative impact related to airport hazards or noise. Impacts related to airport or airstrip noise would not be cumulatively considerable and cumulative impacts would be less than significant.

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4.11 Population and Housing

This section addresses whether impacts related to population growth and displacement could occur with implementation of the Proposed Project. Data used to prepare this section was sourced from the Association of Bay Area Governments (ABAG) and the California Department of Finance (DOF).

4.11.1 Setting

Historic Population Trends

After its incorporation in 1902, Mountain View experienced steady population growth throughout the Twentieth century. From 1970-1980, the city's population increased modestly from approximately 54,132 to 58,655 residents (DOF 1982). Growth accelerated in the following decade, with the population increasing from 59,600 in 1981 to 67,500 in 1990 (DOF 1992). In the 1990s, the city's population growth slowed to 4.96 percent, reaching a population of 70,708 in 2000 (DOF 2007). From there, the city continued to gradually increase in population though the rate of growth slowed to 3.34 percent during the 2000s until 2010, when the city experienced an increase of 10.54 percent growth in population from 74,066 to 81,875 residents in 2020 (DOF 2012, DOF 2025a). Since then, population growth in Mountain View has been steady, increasing at a rate of 5.66 percent to 86,513 residents as of January 1, 2025 (DOF 2025b).

Households and Dwelling Units

A household is defined by the DOF as a group of people who occupy a housing unit. A dwelling unit is defined by Mountain View City Code Section 16.01.090 as "one (1) or more rooms connected together, but structurally divided from other structures or from all other rooms in the same structure and providing residence for family." A household differs from a dwelling unit because the number of dwelling units includes both occupied and vacant dwelling units. Not all of the population lives in households; a portion lives in group quarters, such as board and care facilities, while others are unhoused. As of 2025, there are 86,513 residents, and 37,410 households in Mountain View, for an average household size of 2.3 residents. .[1]

Development in Mountain View is guided by a vision of increasing the quantity and diversity of housing options through walkable neighborhoods with access to resources and a focus on higher-density and mixed-use housing near transit, employment centers, and services (City of Mountain View 2023). As shown in Table 4.11-1, there are 40,534 dwelling units in Mountain View. These consist of 10,954 single-family detached units, 5,324 single-family attached units, 23,227 multi-family dwelling units, and 1,029 mobile homes (DOF 2025c).

Growth Projections

Table 4.11-1 presents population, dwelling units, and employment projections through 2050 for Mountain View. The 2050 No Project Conditions are aligned with the build out of the City of Mountain View 2023-2031 Housing Element Update, and the Project Contribution to 2050 Conditions was calculated by the City using basic assumptions based on the respective allowed densities in each R3 Zoning District. An estimation of the Project's contribution to employment is

[1] The estimated number of 2.0 persons per unit in new multifamily development used in this analysis was calculated by City of Mountain View planning staff, based on the population in existing multifamily units in the City (American Community Survey Tables B25024 and B25033).

included in the table for informational purposes but will not be discussed further for the purpose of the analysis conducted in this EIR.

Table 4.11-1 Existing Mountain View Population, Dwelling Units, and Employment and Projections

	Existing Baseline (2025)	2050 Conditions, No Project	2050 Future Total with Project[4]	Project Contribution to 2050 Conditions (Net Change)
Dwelling Units	40,534[1]	70,100	84,900	16,000
Population	86,513[2]	148,200	177,800	32,000
Jobs	83,844[3]	133,000	133,000	Marginal [5]

[1] Source: Department of Finance (DOF) 2025a.

[2] Source: DOF 2025b.

[3] Source: American Community Survey 2023

[4] 2050 conditions and Project contributions were calculated by City staff. The total of 16,000 units includes new capacity created by the Project (approximately 14,800 units) plus existing capacity allowed under zoning (approximately 1,200 units). Totals may not add because a small amount of growth on Project parcels is assumed in the 2050 Condition No Project scenario.

[5] Small amount of neighborhood commercial would be included. This is expected to add between 100-250 jobs, which is marginal at this scale of Project. In addition, new housing may increase employment by an unknown amount through home occupations.

4.11.2 Regulatory Setting

a. State Regulations

State Housing Element Law

State housing element statutes (Government Code Sections 65580 through 65589.11) mandate that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law recognizes that for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. As a result, State housing policy rests largely upon the effective implementation of local general plans and, in particular, housing elements. Additionally, Government Code Section 65588 dictates that housing elements must be updated at least once every eight years. The City of Mountain View maintains a Housing Element associated with the City's General Plan, which is described below and addresses housing affordability, including Regional Housing Needs Assessment (RHNA) goals.

Housing Crisis Act of 2019

The Housing Crisis Act of 2019 (SB 330) seeks to speed up housing production in the next half decade by eliminating some of the most common entitlement impediments to the creation of new housing, including delays in the local permitting process and cities enacting new requirements after an application is complete and undergoing local review—both of which can exacerbate the cost and uncertainty that sponsors of housing projects face. In addition to speeding up the timeline to obtain building permits, the bill prohibits local governments from reducing the number of homes that can be built through down-planning or down-zoning or the introduction of new discretionary design guidelines. The Housing Crisis Act also includes tenant protection measures for demolition projects. Pursuant to SB 330, developers must replace protected units on a one-for-one basis and provide relocation benefits and a right of first refusal for income-qualified tenants to return to a new unit.

The bill was amended on September 16, 2021 (SB 8) to extend key provisions of SB 330 from January 1, 2025, to January 1, 2030. Significant amendments include expanding the definition of "hearing" and clarifying the definitions of "housing development projects" and "affordable housing project." SB 8 also modifies how existing dwelling units that will be replaced with a new project through the Housing Crisis Act are protected and how tenants must be offered relocation or assistance. In addition, SB 8 clarifies the Housing Crisis Act requirement of "no net loss in residential capacity" (Kronick 2021).

AB 130, effective July 1, 2025, permanently extended the Housing Crisis Act by repealing SB 330's sunset clause. As a result, the Act's provisions will remain in effect beyond the January 1, 2030 deadline established by SB 8.

Relocation Assistance

Section 7261(a) of the California Government Code requires that programs or projects undertaken by a public entity must be planned in a manner that (1) recognizes, at an early stage in the planning of the programs or projects and before the commencement of any actions which will cause displacements, the problems associated with the displacement of individuals, families, businesses, and farm operations, and (2) provides for the resolution of these problems in order to minimize adverse impacts on displaced persons and to expedite program or project advancement and completion. The displacing agency must ensure the relocation assistance advisory services are made available to all persons displaced by the public entity. If the agency determines that any person occupying property immediately adjacent to the property where the displacing activity occurs is caused substantial economic injury as a result of the displacement, the agency may also make the advisory services available to that person. In addition to these public agency requirements, most residential development projects are undertaken by private entities and must also comply with the Housing Crisis Act of 2019 (SB 330), which imposes tenant protection measures on developers, as described above.

State Density Bonus Law

California's State Density Bonus Law (Government Code Section 65915) requires cities and counties to grant a density bonus, incentives or concessions, waivers of development standards, and specified parking ratios and requirements, if certain affordability thresholds are met. A project is eligible if it provides at least 5 percent of units for very low-income households, or 10 percent for low-income households in any residential development, or 10 percent of units for moderate-income households in a common interest development. Depending on the level and type of affordability, developers may receive up to 100 percent additional density above what is allowed by base zoning.

AB 1763

AB 1763, effective January 1, 2020, amends the State Density Bonus Law (Section 65915) to allow for taller and denser 100 percent affordable housing developments, especially those near transit, through the creation of an enhanced affordable housing density bonus.

b. Regional Regulations

Plan Bay Area 2050

Mountain View is located within the ABAG planning area. ABAG functions as the Metropolitan Planning Organization for Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa

Clara, Solano, and Sonoma Counties, and is responsible for implementing the Regional Transportation Plan/Sustainable Communities Strategy, which is called Plan Bay Area 2050 (ABAG 2021a). Plan Bay Area 2050 is a long-range integrated transportation and land-use/housing strategy for the San Francisco Bay Area through 2050.

Metropolitan Transportation Commission Transit-Oriented Communities Policy

Metropolitan Transportation Commission's (MTC) Transit-Oriented Communities (TOC) Policy supports two strategies included in Plan Bay Area 2050: Strategy H3 (Allow a greater mix of housing densities and types in Growth Geographies) and Strategy EC4 (Allow greater commercial densities in Growth Geographies). TOC Policy goals help advance Plan Bay Area 2050, including:

1. Increase the overall housing supply in part by increasing the density for new residential projects. Prioritize affordable housing in transit-rich areas.
2. In areas near regional transit hubs, increase density for businesses and commercial development.
3. Prioritize bus transit, active transportation and shared mobility (such as bike share and car share) within and to/from transit-rich areas, particularly to Equity Priority Communities located more than one half-mile from transit stops or stations.
4. Support and build partnerships to create equitable transit-oriented communities within the San Francisco Bay Area.

The TOC Policy itself states that the legislation would "support the region's transit investments by creating communities around transit stations and along transit corridors that not only support transit ridership, but that are places where Bay Area residents of all abilities, income levels, and racial and ethnic backgrounds can live, work and access services, such as education, childcare, and healthcare (MTC 2024). The TOC Policy is rooted in Plan Bay Area 2050, the region's Long Range Transportation Plan/Sustainable Communities Strategy. The TOC Policy applies to areas within one half-mile of the following types of existing and planned fixed-guideway transit stops and stations: regional rail, commuter rail, light-rail transit, bus rapid transit, and ferries. The policy requirements consist of the following four elements: 1) minimum required and allowed residential and/or commercial office densities for new development; 2) policies focused on housing production, preservation and protection, and commercial anti-displacement and stabilization polices; 3) parking management; and 4) transit station access and circulation" (MTC 2023).

In alignment with the TOC Policy, the R3 Zoning District Update would result in increased density for several parcels within ½ mile of major transit stops, thereby improving the City's performance relative to the Policy criteria.

c. Local Regulations

Mountain View 2030 General Plan

The Mountain View 2030 General Plan serves as the City's primary framework for guiding physical development and preservation. It outlines long-term goals, policies, and visual elements to inform local planning decisions. The Land Use and Design Element includes the following policies addressing population and housing:

Policy LUD 3.2 Mix of Land Uses. Encourage a mix of land uses, housing types, retail and public amenities, and public neighborhood open spaces accessible to the community.

Policy LUD 3.5 Diversity. Encourage residential developments serving a range of diverse households and incomes.

Policy LUD-6.2 Equitable location of amenities. Pursue equitable distribution of community amenities, public facilities and services within walking distance of residential neighborhoods.

Mountain View Housing Element

The Housing Element is required by the General Plan. The purpose of the Housing Element is to identify and analyze existing and projected housing needs in order to preserve, improve, and develop housing for all economic segments of the community, consistent with the RHNA regulations described above. The City adopted its current Housing Element in 2023 as part of the 2023-2031 planning cycle.

City of Mountain View Below-Market-Rate Housing Program

Chapter 26. Article XIV, Division 2 of the City of Mountain View's City Code requires that at least 15 percent of units in new residential developments and qualifying condominium conversions be designated as Below-Market-Rate) units or that developers pay an in-lieu fee. For residential ownership projects involving rowhouses or townhouses, a 25 percent on-site Below-Market-Rate unit requirement applies.

Community Stabilization and Fair Rent Act

The Community Stabilization and Fair Rent Act (CSFRA) protects tenants from excessive rent increases and unjust evictions while allowing landlords a fair return on their investment. Under the CSFRA, landlords of fully protected units can raise rent only once per year with an increase capped at an annual adjustment tied to inflation, typically between 2 and 5 percent, however landlords are able to petition the City for approval if they believe they need a higher increase to maintain a fair rate of return. Likewise, tenants have the right to petition for rent reductions if services or maintenance decline. In addition to rent increase protections, the CSFRSA limits evictions to nine specific "just causes" such as nonpayment of rent, lease violations, nuisance, or owner move-in. For most at-fault reasons, landlords must provide tenants with notice and an opportunity to correct the issue. No-fault evictions, such as those for major repairs or demolition, require landlords to provide relocation assistance to displaced tenants. The CSFRA also mandates that rental units must remain safe and habitable, that utilities must be included in total rent costs, and that services provided at the start of tenancy continue throughout. The CSFRA applies primarily to multi-unit rental properties built before February 1, 1995, which are subject to both rent control and protection. Properties built between 1995 and December 2016 receive partial coverage, which exempts these properties from rent caps but still require "just cause" for evictions.

Mobile Home Rent Stabilization Ordinance

The Mobile Home Rent Stabilization Ordinance (MHRSO) protects mobile home residents from unreasonable rent increases and provides just cause eviction notices for tenants, while also protecting the rights of mobile home park owners and mobile home landlords to receive a fair return on their property and rental income sufficient to cover increases in the costs of operating their parks. The MHRSO is applicable to all mobile homes in the City of Mountain View, except for:

- Newly constructed spaces initially held out for rent after January 1, 1990 (Cal. Civil Code Section 798.45), or
- Leases in effect for longer than 12 months that were entered into before February 13, 2020 until the earlier of (i) the expiration of the lease or (ii) January 1, 2025 (California Civil Code Section 798.17(b), or
- Mobile home spaces that are not used as a primary residence by the mobile home owner or tenant of a mobile home landlord (California Civil Code Section 798.21).

Tenant Relocation Assistance Ordinance

The displacement of tenants for housing developments may require tenant relocation assistance through the State's Housing Crisis Act or the City's Tenant Relocation Assistance Ordinance (TRAO). When applicable, the stricter of either the TRAO or SB 330 requirements will prevail. The TRAO requires landlords to provide relocation assistance to eligible tenants who live on a property with three or more rental units that are displaced due to renovations, redevelopment, or other activities, to assist lower-income households with moving costs and deposits to secure replacement housing. Tenants are eligible for relocation assistance if:

- The household income is 120 percent (plus $5,000) or less than the Area Median Income;
- The household has a valid lease or rental agreement with the landlord; and
- The household is not delinquent on rental payments.

If eligible, relocation assistance is provided as cash payment to tenants on the lease or rental agreement. The following assistance is paid per rental unit:

- Full refund of a tenant's security deposit'
- A subscription to a rental agency;
- The cash equivalent of three months median market rate rent for a similar sized apartment; and
- An additional $8,000 for special-circumstance tenants, which are households having at least one person that is either over 62 years of age, handicapped, disabled, or a legally dependent child 19 years of age or younger.

4.11.3 Impact Analysis

Methodology and Thresholds of Significance

Population and housing trends in the county were evaluated by reviewing the most current data available from the DOF, Plan Bay Area 2050, and the City Housing Element. Impacts related to population are generally social or economic in nature. Under CEQA, a social or economic change generally is not considered a significant effect on the environment unless the changes are directly linked to a physical change (*CEQA Guidelines* Section 15131).

To determine whether a project would result in a significant impact to Population and Housing, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

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

For purposes of this analysis, "substantial" population growth is defined as growth exceeding ABAG/MTC population forecasts for the city or exceeding the city's identified population and housing needs. "Substantial" displacement would occur if allowed land uses would displace more residents than would be accommodated through growth provided by Project implementation. The Project does not involve specific development projects and so the Project itself would not result in direct physical changes to population or housing. However, effects on population and housing could occur as a result of the proposed zoning changes. Future development projects could replace existing housing units and add new units, increasing the city's population. Population growth could result in physical changes related to transportation, air quality, noise, public services and utilities, and other environmental resource areas. These physical impacts are analyzed under the other environmental topics in this EIR.

Project Impacts and Mitigation Measures

Threshold 1:	Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Impact POP-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD ACCOMMODATE ADDITIONAL RESIDENTS AND DWELLING UNITS BUT WOULD NOT EXCEED PLAN BAY AREA 2050 POPULATION AND HOUSING FORECASTS. ALTHOUGH DEVELOPMENT FACILITATED BY THE PROJECT WOULD EXCEED THE REQUIRED PLANNED HOUSING PURSUANT TO THE CITY'S MOST RECENT RHNA AND ANTICIPATED WITHIN THE CITY'S 6TH CYCLE HOUSING ELEMENT, NEW HOUSING BUILT PURSUANT TO THE PROJECT WOULD BE SUBJECT TO DENSITY AND DEVELOPMENT STANDARDS OF THE R3 DISTRICT WHICH, IF ADOPTED, WOULD NOT BE UNPLANNED GROWTH. THEREFORE, THE PROJECT WOULD NOT RESULT IN UNPLANNED POPULATION GROWTH AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Chapter 2, *Project Description*, the Project could accommodate an estimated increase of up to 32,000 buildout population potential and up to 16,000 new dwelling units in the Project area, which includes R3-zoned parcels and select R2-zoned parcels to be integrated into the R3 Zoning District throughout the city. Table 4.11-2 compares the population and housing buildout resulting from the Project to population and housing forecasts estimated by ABAG and the City's General Plan.

For purposes of analysis, "substantial" unplanned population growth is defined as growth exceeding that forecasted in existing local and regional plans, including the ABAG Regional Growth Forecast and the existing General Plan. The Project would increase the development capacity of the city through the rezoning of selected parcels. As noted in Chapter 2, *Project Description* (refer to Table 2-11), and shown in Table 4.11-1, the net increase in development potential accommodated by the Project would be 16,000 housing units. This EIR conservatively assumes an additional 32,000 residents associated with the additional housing units using the City's 2025 average persons per multifamily unit of 2.0 (City of Mountain View 2025). The buildout year for this analysis is 2050, as the citywide development that would be facilitated by the Project is expected to occur gradually. With the buildout of the Project by 2050, the city would have a total of 84,900 housing units and a population of 177,800 residents, as shown in Table 4.11-1 in Section 4.11.1, *Setting*. ABAG estimates projected growth in the San Francisco Bay Area counties in its regional planning document, Plan Bay Area 2050. Although Plan Bay Area 2050 does not specify exact dwelling unit or population projections for cities, the Plan's RHNA methodology allocates 1.754 percent of overall Bay Area households in 2050 to the City of Mountain View (ABAG 2021b). Plan Bay Area's Forecasting and

Modeling Report projects a total of 4,043,0000 Bay Area households in 2050 (ABAG 2021c). Therefore, it is possible to estimate dwelling unit projections for the City of Mountain View from ABAG data. Table 4.11-2, below, compares 2050 ABAG buildout projections with the maximum buildout estimated to be facilitated by the City's Housing Element and the R3 Zoning District Update. Although buildout from the Project alone would be within ABAG projected housing buildout, when combined with buildout planned by the City's Housing Element, housing buildout would exceed ABAG projections by 13.7 percent.

Table 4.11-2 Projected Housing Growth

	ABAG Buildout Projections, No Project (2050)[1]	Housing Element and Project Buildout[2]	Approximate Difference (Percent)[3]
Housing (# of dwelling units)	74,650	84,900	13.7%

[1] Data from Plan Bay Area 2050 Forecasting and Modeling Report (ABAG 2021c) and the ABAG 2023-2031 RHNA (ABAG 2025) were used for dwelling unit projections. Plan Bay Area's RHNA estimates that the City of Mountain View will hold 1.754 percent of the total projected 4,043,000 Bay Area Households in 2050. Assuming a vacancy rate of approximately 5 percent, ABAG projects that the City of Mountain View will have a total of approximately 74,650 dwelling units in 2050.

[2] Refer to the column titled "2050 Future Total with Project" in Table 4.11-1.

[3] This is a conservative estimate of the percent increase from the ABAG buildout projections using the maximum potential buildout that the R3 Zoning District Update and maximum Housing Element buildout could facilitate.

As shown in Table 4.11-1 and Table 4.11-2, the projected growth associated with the Project would exceed projected growth in the city over the City's Housing Element and ABAG projections. Although the estimated Project population growth exceeds what is required to be planned for by the City's 2023-2031 6th Cycle Housing Element (25,611 residents)[2], this is a conservative estimate assuming maximum buildout. While the R3 Zoning District Update could facilitate the development of 16,000 dwelling units, no projects are currently proposed, and future developments would occur incrementally over several decades. It is also conservative to state that growth facilitated by the Proposed Project would exceed Housing Element projections because the Proposed Project's planning horizon extends to 2050, whereas the Housing Element addresses housing needs only through 2031 (City of Mountain View 2023). Additionally, since the ABAG Regional Growth Forecast is updated with each iteration of the MTP/SCS, the forecast will be updated in future years to reflect changes associated with updates to each jurisdiction's General Plan, including land use designations. Although the Project would facilitate development beyond what is forecast for the city in the ABAG Regional Growth Forecast, the Project would be consistent with state requirements since it facilitates the City's ability to develop housing units at sufficient densities to achieve state objectives for the City's 6th Cycle Housing Element.

Furthermore, because the Project itself is a planning program, the City's planning process for the Project would result in planned growth. This growth is evaluated in this EIR against regional and local planning assumptions. In addition, the Project itself includes maximum densities and development standards that constitute limit unplanned growth by their nature. Finally, the Project would not involve the extension of roads or other infrastructure that could indirectly lead to population growth. The city is mostly developed and is supported by existing public services and infrastructure which are sufficient to serve the additional housing units, as discussed in Section 4.12, *Public Services and Recreation,* and Section 4.13, *Transportation*. Therefore, the Project would not

[2] The City's RHNA requires the City to accommodate the development of at least 11,135 housing units for the 2023-2031 Housing Element planning period: a minimum of 11,135 households * 2.3 persons per household = a minimum of 25,611 residents to accommodate.

result in substantial unplanned population growth, either directly or indirectly, and impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation is required.

Threshold 2:	Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Impact POP-2 DEVELOPMENT FACILITATED BY THE PROJECT COULD DISPLACE EXISTING HOUSING OR PEOPLE, NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE. HOWEVER, THIS WOULD BE SUBSTANTIALLY OFFSET BY THE TOTAL NUMBER OF UNITS ADDED AS A RESULT OF PROJECT IMPLEMENTATION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Project would accommodate new development and redevelopment projects in the city through rezoning and upzoning to facilitate development with higher residential densities than previously allowed on those sites.

Identified R3 Zoning District Update sites may contain existing housing units, and the proposed redevelopment of these sites, areas, and parcels may result in the displacement of residents. The Proposed Project is limited to policy and development standard amendments. The Project would increase the total buildout potential of the identified R3 Zoning District Update sites, thus providing areas for the development of new housing projects consistent with the new zoning designation of these sites. While the Project does change the development potential for specific sites and parcels in the city, it does not include or permit specific development on any site. Therefore, the Project itself would not demolish existing structures nor displace any existing people or housing.

The Project could create capacity for up to 16,000 additional housing units through the facilitation of new development and redevelopment of nonvacant sites, and would support the development of housing units in greater numbers than the number of units that may be demolished. The fundamental Project objectives are to create opportunities for diverse unit types and use density change in targeted areas to achieve desired goals and increase the supply of housing by updating the R3 Zoning District to address Housing Element Programs and be consistent with state law.

Furthermore, all city residents who rent are provided with some mitigation, protection and compensation under AB 1482 and SB 567, which amended Sections 1946.2 and 1947.12 of the California Civil Code. In addition to these statewide measures, many Mountain View residents are granted similar protections under the City's Tenant Relocation Assistance Ordinance (TRAO), Community Stabilization and Fair Rent Act (CSFRA), and the Mobile Home Rent Stabilization Act (MHRSA). Eligibility requirements for protection under these local regulations is described in Section 4.11.2, *Regulatory Setting,* above. These regulations provide statewide and local tenant protections, including limits on rent increases, protections from evictions without cause, and relocation benefits for no-fault evictions. However, AB 1482 and SB 567 only apply to rentals that are not protected under the CSFRA or MHRSO. Specifically, AB 1482 requires relocation assistance payments to tenants renting a "covered" rental unit. Additionally, the Housing Crisis Act requires a one-for-one replacement of "protected" units that are demolished as part of new residential and non-residential projects, as well as right of first refusal to a new replacement unit for existing tenants that are displaced as a result of the redevelopment project.

In addition, tenants occupying dwelling units that could be subject to demolition may qualify for relocation assistance under the Housing Crisis Act (SB 330) or the City's TRAO. When both regulations apply, the more stringent requirements prevail, ensuring adequate protections for Mountain View tenants in the event of displacement.

The Project would facilitate the redevelopment of parcels throughout the city that may contain existing housing units and could result in displacement of the residents of those households. Although residences may be removed as part of redevelopment on those sites, this loss would be substantially offset by the total number of units added as a result of Project implementation. Furthermore, tenants occupying properties subject to demolition may be eligible under the TRAO and/or SB 330 to the right of first return, such that eligible existing tenants could secure housing in newly built properties to be developed under the Proposed Project. Thus, displacements that may occur would not necessitate construction of housing elsewhere, as a net increase in housing would be accommodated in the city. With incorporation of state and local laws, goals, and policies that support tenant protections and replacement of demolished units, the Project would mitigate potential impacts related to displacement of existing housing and residents. Impacts related to displacement of existing residences would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation is required.

4.11.4 Cumulative Impacts

IMPACT POP-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD NOT INDUCE SUBSTANTIAL UNPLANNED POPULATION GROWTH AND WOULD NOT RESULT IN A CUMULATIVELY SIGNIFICANT DISPLACEMENT OF PEOPLE OR HOUSING. CUMULATIVE POPULATION AND HOUSING IMPACTS WOULD BE LESS THAN SIGNIFICANT, AND THE CONTRIBUTION OF THE PROJECT WOULD NOT BE CUMULATIVELY CONSIDERABLE.

The geographic scope for cumulative population and housing impacts is the city of Mountain View and surrounding areas. This geographic scope is appropriate for population and housing because projections at this level are used to estimate the need for public services and other government facilities and programs. Regional cumulative impacts consider impacts that would occur from the buildout of cumulative planning documents and reasonably anticipated projects identified in Table 3-1 in Chapter 3, *Environmental Setting*. The general approach to cumulative impact analysis used in this DEIR is discussed in Chapter 3, *Environmental Setting.*

Cumulative development would result in population growth. However, cumulative development would be required to adhere to applicable zoning and development regulations and General Plan policies to mitigate environmental impacts where feasible and would undergo environmental review, including consideration of whether the projects would induce unplanned population growth. With these considerations prior to Project approval, cumulative impacts related to growth inducement would be less than significant.

Cumulative development would be required to undergo environmental review, including consideration of whether the projects would displace people or residences. In the event that people or residences are displaced, AB 1482, SB 330, and/or the City's Tenant Relocation Assistance Ordinance would apply, as mentioned under Impact POP-2. With these considerations prior to Project approval, cumulative impacts related to the displacement of people or residences would be less than significant.

4.12 Public Services and Recreation

This section assesses potential impacts related to public services, including fire and police protection, public schools, and other public facilities including parks from the Proposed Project. Impacts related to water and wastewater infrastructure and solid waste collection and disposal are discussed in Section 4.15, *Utilities and Service Systems*.

4.12.1 Setting

Fire Services

The Mountain View Fire Department (MVFD) is responsible for protecting life and property in the Mountain View area. In the Fiscal Year 2023-2024, the MVFD served 83,000 residents and responded to 10,653 incidents. The MVFD has 88.5 full-time personnel, including 3 shift battalion chiefs, 1 training/ems/safety battalion chief, 22 captains, 21 engineers, and 24 firefighters , supported by administrative and emergency services staff. 32 personnel are licensed paramedics. The City has an emergency operations plan to protect public safety and plan for continuity of city services during a disaster. The MVFD has a target response time of four minutes for the first due apparatus with an average response time of approximately five minutes and thirty seconds. The department adheres to industry standards and maintains a Class 1 ISO rating, the highest possible classification for fire protection (MVFD 2024).

The department maintains five fire stations, of which, Stations 1, 2, 3, and 4 are closest to the R3 Zoning District sites:

- Station 1: 251 South Shoreline Boulevard
- Station 2: 160 Cuesta Drive
- Station 3: 301 North Rengstorff Avenue
- Station 4: 229 North Whisman Road
- Station 5: 2195 North Shoreline Boulevard

MVFD has also entered into mutual aid and automatic aid agreements with neighboring agencies, including the Palo Alto Fire Department, the Sunnyvale Public Safety Services, and the Santa Clara County Fire Department, establishing coordinated regional emergency response (MVFD 2024).

Police Services

The Mountain View Police Department (MVPD) provides essential public safety and law enforcement services to the City of Mountain View. The department is organized into three divisions: Field Operations, Special Operations, and Public Safety Support Services. MVPD operates from a single location at the Robert K. Schatz Police and Fire Administration Building, located at 1000 Villa Street (City of Mountain View, 2025a). The department is staffed by one Police Chief, three Captains, four Lieutenants, sixteen Sergeants, seventy sworn officers,14 Public Safety Dispatchers, and 10 Community Services Officers (MVPD, 2025). In 2024, MVPD public safety dispatchers handled more than 35,000 emergency calls and officer-initiated incidents, over 100,000 total calls, including nearly 25,000 9-1-1 calls.

The department does not maintain a formal citizen-to-officer ratio goal, but it does establish performance benchmarks related to response times for high-priority calls and the speed of answering 9-1-1 calls.

Public Schools

Several school districts serve Mountain View's public school students from elementary through high school, including the Mountain View Whisman School District (MVWSD), the Los Altos School District (LASD), and the Mountain View Los Altos Union High School District (MVLA).

Mountain View Whisman School District (MVWSD)

MVWSD is located in Mountain View and operates nine elementary schools and two middle schools, with a total enrollment of 4,644 students for the 2024-2025 school year (California Department of Education [CDE] 2025a). The district operates the following schools (MVWSD 2025):

- Benjamin Bubb Elementary School
- Mariano Castro Elementary School
- Gabriella Mistral Elementary School
- Amy Imai Elementary School (formerly Huff)
- Edith Landels Elementary School
- Monta Loma Elementary School
- Stevenson Elementary School
- Theuerkauf Elementary School
- Jose Antonio Vargas Elementary
- Crittenden Middle School
- Isaac Newton Graham Middle School

Los Altos School District (LASD)

LASD is located in Los Altos, California, and serves Los Altos, Los Altos Hills, Mountain View, Palo Alto, and unincorporated areas. LASD operates seven elementary schools and two middle schools, though the only LASD school in Mountain View is Springer Elementary, which has an enrollment of 365 students (CDE 2025b).

Mountain View Los Altos Union High School District (MVLA)

The MVLA school district serves high-school aged and older students in Mountain View, Los Altos, and Los Altos Hills. The MVLA oversees two high schools, one continuation high school (Alta Vista High School), an adult education center, two alternative education settings, the Freestyle Academy for Arts and Technology and Middle College (MVLA 2025). Of these schools, Mountain View High School, Freestyle Academy, Alta Vista High School, and MVLA Adult School are all located within Mountain View city limits. As of the 2024-2025, school year, the MVLA district had a total enrollment of 4,459 students (CDE 2025c).

Table 4.12-1 MVLA, LASD, and MVLA Student Generation Rates1

Grade	Generation Rate per Market-Rate Multi-Family Unit[1]
Mountain View Whisman School District (MVWSD)	
K--5	0.085
6--8	0.039
Los Altos School District (LASD)	
K—8	0.63
Mountain View Los Altos Unified High School District (MVLA)	
9--12	0.047

[1] Source: City of Mountain View 2022

Parks and Recreation

The City's Parks Division provides park maintenance services to the City's parks, bicycle trails, and pedestrian trails. The Mountain View General Plan and Chapter 41 of the Mountain View City Code set a goal of three acres of recreational area per 1,000 residents. As of 2025, the City has a total of approximately 1,036.88 acres of total parks, open space and special use areas, or 11.99 acres per 1,000 residents (City of Mountain View 2025b, DOF 2025). However, not all of this area is considered parkland by the City. The Parks Division oversees 46 urban parks and 17.86 miles of bicycles and pedestrian trails. Currently, the City of Mountain View provides 390.51 acres of developed park lands for its 86,513 residents, or 4.51 acres per 1,000 residents (City of Mountain View 2025b, DOF 2025). An overview of the number of parks and open space acreage as reported by the City's 2025 Draft Parks and Recreation Strategic Plan is shown in Table 4.12-2, below.

Table 4.12-2 Existing City-Owned Parks and Acreage

Park Type	Number of Parks	Open Space Acres
Mini Parks	19	12.31
City-Owned Neighborhood Parks	7	25.32
School Sites	11	40.02
City-Owned Community Parks	6	88.69
Regional Parks	2	172
Trail Corridors		52.17
Open Space		353.66
Special Use Areas		292.71
Total	**39**	**1,036.88**

Source: City of Mountain View 2025b

Shoreline at Mountain View is a 789.5-acre regional park that includes wetlands, marshes, upland habitats, a golf course, a sailing lake, the historic Rengstorff House, and nearby open spaces such as Crittenden Hill and Vista Slope. Of Shoreline's 789.5 acre-span, the City's Draft Parks and Recreation Strategic Plan classifies 172 acres as a Regional Park, 282.5 acres as a Special Use Park, and 335 acres as Protected Open Space. Using this classification system, 172 acres of the total 789.5 acres at Shoreline count towards the City's park land goal and represent approximately 22 percent of the City's park land acreage (City of Mountain View 2025b).

School sites also contribute significantly to Mountain View's park system by offering recreational opportunities to nearby residents. Through joint-use agreements with the Mountain View Whisman School District (MVWSD), the City provides public access to school grounds and facilities. These sites host many of the city's sports amenities, including fields for baseball, softball, and soccer. The City's policy of collaboration with local school districts supports shared use of 11 school sites spanning 40.02 acres, encompassing both active and inactive campuses within MVWSD(City of Mountain View 2025b).

Public Libraries

Mountain View Public Library, a municipal library operated by the City, is located at 585 Franklin Street. The Mountain View Public Library serves the residents of Mountain View, with 56,632 library card holders in the Fiscal Year 2023-24 (Mountain View Public Library 2025). The library offers a wide range of services including books, periodicals, digital resources, homework help, and community programs for all ages. The mission of the Mountain View Public Library is to be a free resource to help the community connect, create, and learn.

4.12.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations pertaining to public services to serve the population growth related to development facilitated by the Proposed Project that are applicable to this analysis. Applicable State and local regulations are described below.

b. State Regulations

California Fire and Building Code

The State of California provides minimum standards for building design through the California Building Code (CBC), which is located in Part 2 of Title 24, California Building Standards Code, of the California Code of Regulations (CCR). The CBC is based on the International Building Code but has been amended for California conditions. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. In general, commercial and residential buildings are plan-checked by local building officials for compliance with the CBC. Typical fire safety requirements of the CBC include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively for local public safety services, including police services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Agencies are required to use Proposition 172 to supplement their local funds for police, as well as other public safety services. Section 35 at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety service."

California Code of Regulations

The California Code of Regulations, Title 5 Education Code, governs all aspects of education in the State, and allows school districts to collect developer fees. The School Facilities Act of 1986 (Assembly Bill [AB] 2926) was enacted and added to the California Government Code (Section 65995) in 1986. It authorizes school districts to collect development fees, based on demonstrated need, and generate revenue for school districts for capital acquisitions and improvements. It also established maximum fees which may be collected under this and any other school fee authorization. AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Section 66000 et seq. of the Government code. Under this statute, payment of statutory fees by developers serves as total mitigation under CEQA to satisfy the impact of development on school facilities.

California Senate Bill 50

As part of the further refinement of the legislation enacted under AB 2926, the passage of SB 50 in 1998 defined the Needs Analysis process in government Code Sections 65995.5-65998. Under the provisions of SB 50, school districts may collect fees to offset the costs associated with increasing school capacity as a result of development. SB 50 generally provides for a 50/50 State and local school facilities match. SB 50 also provides for three levels of statutory impact fees. The application level depends on whether State funding is available; whether the school district is eligible for State funding; and whether the school district meets certain additional criteria involving bonding capacity, year-round schools, and the percentage of moveable classrooms in use.

California Government Code sections 65995-65998 sets forth provisions to implement SB 50. Specifically, in accordance with section 65995(h), the payment of statutory fees is “deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization…on the provision of adequate school facilities.” The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Pursuant to Government Code section 65995(i), “A State or local agency may not deny or refuse to approve a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in section 56021 or 56073 on the basis of a person's refusal to provide school facilities mitigation that exceeds the amounts authorized pursuant to this section or pursuant to section 65995.5 or 65995.7, as applicable.”

California Education Code section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.

Quimby Act (California Government Code Section 66477)

The Quimby Act was established by the California Legislature in 1965 to provide parks for growing communities in California. The Act authorizes cities to adopt ordinances addressing park land and/or fees for residential subdivisions for the purpose of providing and preserving open space and recreational facilities and improvements. The Act requires the provision of 3 acres of park area per 1,000 persons residing in a subdivision, unless the amount of existing neighborhood and community

park area exceeds that limit, in which case the county or city may adopt a higher standard not to exceed 5 acres per 1,000 residents. The Act also specifies acceptable uses and expenditures of such funds. Revenues generated through the Quimby Act cannot be used for the operation and maintenance of park facilities.

c. Local Regulations

Mountain View 2030 General Plan

The Mountain View 2030 General Plan contains the following goals and policies from the Land Use and Design, Mobility, Infrastructure and Conservation, Parks, Open Space and Community Facilities, and Public Service Elements:

Goal LUD-3: A diverse, balanced and flexible mix of land uses that supports a strong economy, complete neighborhoods, transit use and community health.

> **Policy LUD 3.1 Land use and transportation.** Focus higher land use intensities and densities within a half-mile of public transit service, and along major commute corridors.
>
> **Policy LUD 3.2 Mix of land uses**. Encourage a mix of land uses, housing types, retail and public amenities and public neighborhood open spaces accessible to the community.

Goal LUD-5: Pedestrian-accessible village centers that serve surrounding neighborhoods.

> **Policy LUD 5.3 Community gathering.** Encourage community-gathering destinations such as plazas, open space or community facilities within village centers.
>
> **Policy LUD-5.4 Connections.** Encourage pedestrian, bicycling and public transit connections and amenities between village centers and surrounding neighborhoods.

Goal LUD-16: A diverse area of complementary land uses and open space resources.

> **Policy LUD-16.1 Protected open space.** Protect and enhance open space and habitat in North Bayshore.
>
> **Policy LUD-16.6 Open space amenities**. Encourage development to include open space amenities, plazas and parks that are accessible to the surrounding transit, bicycle and pedestrian network.

Goal MOB-3: A safe and comfortable pedestrian network for people of all ages and abilities at all times.

> **Policy MOB-3.2 Pedestrian connections**. Increase connectivity through direct and safe pedestrian connections to public amenities, neighborhoods, village centers and other destinations throughout the city.

Goal MOB-4: A comprehensive and well-used bicycle network that comfortably accommodates bicyclists of all ages and skill levels.

> **Policy MOB-4.1 Bicycle network.** Improve facilities and eliminate gaps along the bicycle network to connect destinations across the city.

Goal MOB-6: Safe and convenient pedestrian and bicycling access to schools for all children.

Policy MOB-6.1 Safe routes to schools. Promote Safe Routes to Schools programs for all schools serving the city.

Policy MOB-6.2 Prioritizing projects. Ensure that bicycle and pedestrian safety improvements include projects to enhance safe accessibility to schools.

Policy MOB-6.3 Connections to trails. Connect schools to the citywide trail systems.

Policy MOB 6.4 Education. Support education programs that promote safe walking and bicycling to schools.

Goal INC-16: Rich and biologically diverse ecological resources which are protected and enhanced.

Goal INC-16.1 Natural areas. Work with regional agencies to protect and enhance natural areas.

Goal INC-16.2 Shoreline at Mountain View. Manage Shoreline at Mountain View Regional Park to balance the needs of recreational, open space, habitat, commercial and other uses.

Goal POS-1: An expanded and enhanced park and open space system.

Policy POS-1.1 Additional parkland. Expand park and open space resources to meet current City standards for open space acreage and population in each neighborhood.

Policy POS-1.2 Recreation facilities in new residential developments. Require new development to provide park and recreation facilities.

Goal POS-2: Parks and public facilities equitably distributed throughout the community and accessible to residents and employees.

Policy POS-2.1 Distribution of parks. Give priority for park acquisition to the Planning Areas identified in the Parks and Open Space Plan.

Policy POS-2.2 Connectivity and transit access. Improve connectivity and transit accessibility to parks.

Policy POS-2.3 Pedestrian and bicycle access. Improve pedestrian and bicycle access to parks, and create new connections to parks to minimize pedestrian and bicycle travel distances.

Policy POS-2.4 Access to Bay and natural areas. Promote safe access to San Francisco Bay, creeks, scenic features and other natural resources in the city and surrounding region.

Policy POS-2.5 Schools. Pursue strategies for preserving its park and open space areas if a school site is declared surplus by the school district.

Policy POS-2.6 Diverse park amenities. Design parks to address a range of activities for diverse populations.

Policy POS-3: Open space areas with natural characteristics that are protected and sustained.

Policy POS-3.1 Preservation of natural areas. Preserve natural areas, creeks and Shoreline at Mountain View Regional Park primarily for low-intensity uses. In special circumstances more active uses may be permitted if the overall natural character of the larger area is retained.

Goal POS-4: Parks and public facilities that are well designed and integrated with the surrounding neighborhood.

Policy POS-4.2 Park design. Implement high-quality park amenities and design.

Goal POS-5: Cooperation between the City and local school districts to meet shared open space, recreation and education needs.

Policy POS-5.2 Schools and open space. Collaborate with the school district on new school development and intensification to accommodate population growth while preserving and protecting public parks and playgrounds.

Policy POS 5.3 School facilities. Ensure school facilities are constructed to serve community needs to the extent allowed by state law.

Policy POS 5.4 School facility needs. Collaborate with local school districts on their facility needs and provide information on development and growth trends.

Goal POS-6: An integrated system of multi-use trails connecting to key local and regional destinations and amenities.

Policy POS-6.2 Citywide network of pathways. Develop a citywide network of pedestrian and bicycle pathways to connect neighborhoods, employment centers, open space resources and major destinations within the city.

Goal PSA-1: A high level of community safety with police, fire and emergency response services that meet or exceed industry-accepted service standards.

Policy PSA 1.1 Adequate staffing. Maintain adequate police and fire staffing, performance levels and facilities to serve the needs of the community.

Policy PSA-1.2 Design for safety. Support and promote crime prevention and fire safety strategies in the design of new developments.

Goal PSA-2: A total commitment to reducing criminal activity and instilling a feeling of safety and security in the community.

Policy PSA-2.1 Community policing. Provide superior community-oriented police services.

Policy PSA-2.2 Sense of safety. Ensure a sense of safety throughout the community.

Policy PSA-2.3 Service and effectiveness. Explore ways to improve service delivery and police effectiveness.

Policy PSA-2.7 Police service levels and facilities. Ensure Mountain View Police Department service levels and facilities meet demands from new growth and development.

Mountain View City Code

Chapter 14 of the Mountain View City Code contains a number of policies, listed below, for providing adequate fire protection and prevention services.

Section 14.10.1 **Adoption of the International Fire Code and the California Fire Code**. Includes specific appendices and amendments.

Section 14.10.3	**Scope and General Requirements**. Establishes requirements for built-in fire protection equipment and activities that may require a higher demand on fire department staff
Section 14.10.12	**Fees; Local fees**. Includes fees for inspections, permits, false alarms, and maintenance of fire protection systems and public safety communication systems.
Section 14.10.14-16	**Fire apparatus access roads; Dimensions, Authority, Turning radius**. Defines regulations pertaining to authority and dimensions of required emergency access roads.
Section 14.10.17-18	**Fire department access and control**. Regulates access control devices and requires visible address identification to facilitate emergency access to buildings for fire department staff.
Sections 14.10.19-21	**Fire hydrant systems and protection equipment**. Specifies requirements for fire hydrant systems, including compliance with the City of Mountain View's public works department's Standard Provisions and Standard Details and Sections 507.5.2 through 507.5.6, as well as clear identification of function and occupancies served by hydrant systems.
Sections 14.10.22-24	**Emergency responder communication systems**. Requires two-way emergency responder communication systems for buildings and references Chapter 80 California Fire Code amendments.
Sections 14.10.28-31	**Fire alarm and sprinkler systems**. Mandates installation and enforcement of fire detection systems and automatic sprinkler systems in all new buildings and structures with specified exceptions and references an amendment to Section 903.3.1 of California Fire Code.
Sections 14.10.31-35	**Standpipe systems**. Regulates standpipe system requirements for buildings, including locations and standards for installation.
Section 14.45	Establishment and duties of the fire prevention bureau. Establishes the Fire Prevention Bureau under the Mountain View Fire Department to enforce City Code fire prevention regulations.
Section 14.40.0-52	**Enforcement and penalties.** Provides processes enforcement of fire protection regulations, including appeals, penalties, and arrests.

In addition, the Mountain View Code of Ordinances regulates the use and maintenance of public parks through Chapter 41 which requires residential developments and subdivisions to dedicate land, pay fees, or both for park and recreational purposes based on project size and density to ensure adequate open space and facilities for residents.

Parks and Open Space Plan

The City of Mountain View adopted its Parks and Open Space Plan in 1992 and updated the plan in 2014. This update was the sixth revision of the plan and provided a comprehensive review of the City's open space resources. The plan outlines a long-term vision to guide the development and preservation of parks and open spaces throughout Mountain View. It includes an assessment of

existing resources as well as recommendations for land acquisition, improvements, and conservation efforts. At the time of this report, the City is the process of developing and implementing a new Parks and Recreation Strategic Plan, which will integrate and replace the 2014 Parks and Open Space Plan and the 2008 Recreation Plan.

Draft Parks and Recreation Strategic Plan

In November 2025, the City of Mountain View published a Draft Parks and Recreation Strategic Plan that is intended to replace and integrate the 2014 Parks and Open Space Plan and the 2008 Recreation Plan. The draft plan establishes a comprehensive framework for the next decade that addresses park acquisition, facility improvements, recreation programming, maintenance, and funding strategies. The draft plan responds to population growth, demographic shifts, and evolving recreation trends, and accordingly includes a level of service analysis, equity mapping, and guidelines for new parks. It outlines goals, strategies, and actions to guide implementation of the plan, and emphasizes equitable access, environmental sustainability, and alignment with the City's General Plan and related initiatives. Adoption of the plan is anticipated in Spring 2026, followed by a parkland nexus study scheduled for Fall 2026.

Citywide School Strategy Policy

City Council Policy No. K-26 Resolution No. 18473, known as the Citywide School Strategy Policy, establishes regulations regarding how the City may support school districts in addressing the need for new or expanded educational facilities. At its discretion, the City may contribute funding for shared-use facilities such as parks or recreation areas or establish a transfer of development rights framework to facilitate land acquisition for schools. This may include allowing developers to transfer development rights or receive exceptions to development standards when land is voluntarily dedicated for school use. The approach may vary depending on the specific needs of each school district. While school districts are responsible for acquiring sites and negotiating with developers, the City may assist by identifying funding gaps and connecting districts with potential landowners. Decisions to implement these measures should be based on ongoing collaboration with school districts, considering factors such as site suitability, funding opportunities, student population data, and overall development feasibility.

4.12.3 Impact Analysis

Significance Thresholds and Methodology

To determine whether a project would result in a significant impact to Public Services, Appendix G of the CEQA Guidelines requires consideration of whether a project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other objectives for any of the public services:

1. Fire protection;
2. Police protection;
3. Schools;
4. Parks; or

5. Other public facilities. Such facilities include libraries and other public utility infrastructure. Impacts related to libraries are discussed in this section under Impact PS-5. Impacts related to public utility infrastructure, such as stormwater, wastewater, water, and solid waste facilities are addressed in Section 4.8, *Hydrology and Water Quality,* and Section 4.15, *Utilities and Service Systems.*

To determine whether a project would result in a significant impact to Recreation, Appendix G of the CEQA Guidelines requires consideration of whether a project would:

1. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and/or
2. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Project Impacts and Mitigation Measures

Threshold 1a: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN INCREASED POPULATION AND BUILDING SQUARE FOOTAGE IN MOUNTAIN VIEW. THIS WOULD INCREASE DEMAND FOR FIRE PROTECTION; HOWEVER, IT WOULD NOT RESULT IN THE NEED FOR NEW OR EXPANDED FIRE PROTECTION FACILITIES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Fire protection services in Mountain View are provided by MVFD. According to the Department of Finance, the City of Mountain View, which also encompasses the MVFD service area, had approximately 86,513 residents as of 2025 (DOF 2025). MVFD has 86 active staff and a current service ratio of 0.99 staff per 1,000 residents (MVFD 2024).

The Proposed Project would not expand the current service area but would facilitate an increase in the number of residents in the Project area by up to 32,000 people through 2050 for a total projected population of 177,800, which would decrease the service ratio to 0.48 staff[1] per 1,000 residents (MVFD 2024). Development facilitated by the Proposed Project would increase calls for service for issues including, but not limited to, emergency medical service, structure or vegetation fires, and traffic collisions. The direct effect on MVFD would include evaluation of staffing and resource deployment to accommodate the increase in call volume throughout the community.

As future buildout occurs under the R3 Zoning District Update, the MVFD would evaluate operations and deployment of services to efficiently use resources. Additionally, new development under buildout of the Project would be required to comply with all applicable State and local regulations governing the provision of fire protection services, including adequate fire access, fire flows, and number of hydrants. This includes the 2022 California Fire Code or its latest iteration, which contains project-specific requirements such as construction standards in new structures and remodels, road widths and configurations designed to accommodate the passage of fire trucks and engines, and requirements for sprinkler systems and minimum fire flow rates for water mains, and

[1] (86 staff / 177,800 residents in 2050) * 1,000 residents = -.48 staff per 1,000 residents

the requirements of Chapter 14 of the Mountain View City Code. These standards applied to new development and redevelopment would address increases in service demands.

In order to maintain the current service ratio of 0.99 staff per 1,000 residents, at least 91 additional staff[2] would be necessary. As a result, MVFD would need to incrementally increase their fire protection services to the City of Mountain View through the year 2050, which could require the construction of new facilities to accommodate subsequent personnel, equipment, and vehicles. The specific placement and potential impacts of new fire protection facilities are unknown at this time because the actual buildout patterns and timing of development facilitated by the Project cannot currently be predicted. Therefore, it would be speculative to assess the environmental impacts of such facilities at this stage. However, the R3 Zoning District Update facilitates development within areas of Mountain View that are currently developed. Construction of new fire protection facilities, if required, would likely occur on property previously disturbed or developed which would reduce the potential for adverse impacts associated with construction of new or expanded MVFD facilities associated with implementation of the R3 Zoning District Update. If construction or expansion of future facilities are needed or proposed, then separate environmental review would be required that would determine and require future project-specific construction-related mitigation measures, if needed.

Therefore, although additional or expanded fire service facilities may be required over time, impacts related to provision of fire protection services would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation is required.

Threshold 1b:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN AN INCREASE OF POPULATION WITHIN MOUNTAIN VIEW. THIS WOULD INCREASE DEMAND FOR POLICE PROTECTION SERVICES. HOWEVER, THIS INCREASE WOULD NOT RESULT IN THE NEED FOR NEW OR EXPANDED POLICE FACILITIES. THIS IMPACT WOULD BE LESS THAN LESS THAN SIGNIFICANT.

Development facilitated by the Project would increase the population in the Project area by approximately 32,000 Mountain View residents. The increase in residents associated with the Proposed Project could increase demand for police protection and emergency medical services such that additional staff, equipment, or facilities would be needed to provide adequate services. While there is no adopted officer-to-resident ratio in the City, the increase in population and associated increase in calls for service is likely to require additional police personnel. As a result, MVPD could need to incrementally increase their police services through the year 2050, which could in turn require the construction of new facilities to house subsequent personnel, equipment, and vehicles.

[2] (0.99 *177,800) / 1000 = 176.02 = at least 177 staff; 177-86 = 91 additional staff

As future buildout occurs under the Project, the City would evaluate operations and deployment of services to efficiently use resources. New development under buildout of the R3 Zoning District Update would be required to comply with all applicable State and local regulations governing the provision of police protection services, including adequate emergency access and community safety measures. Furthermore, the Project could allow for up to 16,000 residential units and facilitate the addition of 32,000 net new residents in Mountain View, which would gradually reduce MVPD's service ratios. As a result, MVPD would need to incrementally increase their police services through the year 2050.

Consistent with Policy PSA 1.1, as future buildout occurs under the R3 Zoning District Update, the City would evaluate operations and deployment services to efficiently use resources and ensure that development does not exceed the service capacity of the MVPD. Further, Policy PSA 1.2 would ensure that development facilitated by the Project would be designed to support crime prevention and a sense of safety in the community, which would also be supported by Policy PSA 2.1, which would provide community-oriented police services. Moreover, Policy PSA 2.3 and PSA 2.5 would ensure that development facilitated by the Project would be supported by effective police services with adequate response times, while Policy PSA 2.7 would ensure that MVPD continues to meet demands associated with new growth and development in the City.

In summary, there is potential for MVPD to increase staffing levels through the year 2050 to meet established standards under buildout of the Project. However, the additional personnel and materials costs would likely be gradual as the increase in population as a result of development under the R3 Zoning District Update would occur incrementally over time. Furthermore, development facilitated by the R3 Zoning District Update would comply with the 2030 General Plan PSA-2.7 which ensures MVPD service levels and facilities meet demands from new growth and development. As such, it would be possible to assess the need for additional police personnel and equipment and address these needs to ensure that the law enforcement response time standards in the community are maintained.

Furthermore, it is unlikely that the Proposed Project would require new or expanded public facilities to maintain acceptable service levels. The R3 Zoning District Update facilitates development within areas of Mountain View that are currently developed. Construction of new police protection facilities, if required, would likely occur on property previously disturbed or developed which would reduce the potential for adverse impacts associated with construction of new or expanded police protection facilities associated with implementation of the R3 Zoning District Update. If construction or expansion of future facilities are needed or proposed, then separate environmental review would be required that would determine and require future project-specific construction-related mitigation measures, if needed.

Therefore, although additional or expanded facilities may be required over time, impacts related to the provision of police protection services would be less than significant.

Mitigation Measures

No mitigation is required. Impacts would be less than significant without mitigation.

Threshold 1c: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Impact PS-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN AN INCREASE IN POPULATION, INCLUDING SCHOOL-AGED CHILDREN SERVED BY MVWSD, LASD, AND MVLA. NONETHELESS, STUDENT GENERATION OF THE PROPOSED PROJECT WOULD BE ACCOMMODATED THROUGH EXISTING POLICIES AND STATUTORY FEE REQUIREMENTS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The R3 Zoning District Update could allow a net increase of up to approximately 16,000 multifamily residential units and facilitate the addition of up to 32,000 net new residents in Mountain View. Development under the Proposed Project could generate new students entering any of the three school districts, however, it is expected that only about 11% of the units will be built in the LASD, while the remainder will be built in the MVWSD (MVLA covers the entire city). These students would be distributed throughout the schools that serve Mountain View depending on their grade level and the nearest school zone. As a result, MVWSD, LASD, and MVLA would need to incrementally increase their school services to the City of Mountain View through the year 2050, which could in turn require the construction of new facilities to accommodate subsequent students, staff, and facility space.

Students residing in the Project area would attend the schools listed in Section 4.12.1, *Environmental Setting*, above. Table 4.12-3 summarizes the potential increase in student population for MVWSD, LASD, and MVLA that could occur as a result of the R3 Zoning District Update, using the generation rates identified in Table 4.12-3.

Table 4.12-3 R3 Zoning District Update Student Generation

Grade	Student Generation Rate[1]	Number of New Students[2]
Mountain View Whisman School District (MVWSD)		
K--5	0.085	1,121
6--8	0.039	556
Los Altos School District (LASD)		
K—8	0.63	1,103[3]
Mountain View Los Altos Unified High School District (MVLA)		
9--12	0.047	752
Total New Students	N/A	**3,532**

[1] Source: City of Mountain View 2022

[2] Future student enrollment was calculated by multiplying market-rate multifamily residential student generation rates by the maximum buildout of 16,000 multifamily residential units. While all units would be served by MVLA, approximately 14,250 units would be served by MVWSD and the remaining 1,750 would be served by LASD.

[3] Future student enrollment in LASD was calculated using a student generation rate from City of Los Altos (2021).

As shown above in Table 4.12-3, buildout of the R3 Zoning District Update would add approximately 3,532 students to MVWSD, LASD, and MVLA by 2040. It should be noted that this estimate does not specify where growth will be concentrated. In reality, growth will be distributed across multiple districts, but the exact allocation is currently unknown. This conservative approach ensures potential impacts are not underestimated for planning purposes and can be refined as more detailed data on housing and district boundaries becomes available. Nevertheless, the addition of

3,532 school students within Mountain View would increase enrollment in schools in Mountain View and could exceed anticipated school district capacities.

However, each of the three school districts serving Mountain View have adopted strategies to address long-term population growth. MVWSD's Master Facilities Plan calls for two additional elementary schools and additional capacity for existing middle schools and identifies potential for new sites in North Bayshore and East Whisman, funded by a proposed bond program (MVWSD 2019). LASD's Master Plan includes the acquisition of a 10th school site in Mountain View, converting junior highs (which currently accept students in 7th and 8th grade only) to accommodate 6th graders, and replacing portables with permanent classrooms via Measure N bond funds and city partnerships (LASD 2020). MVLA's Facilities Master Plan identifies plans for 29 new classrooms, new student services buildings, and expanded facilities at both high schools, with a $281-$308 million program budget for additional classrooms in the future (MVLA 2018). While the R3 Zoning District Update may result in the addition of 3,532 students to be allocated across the three school districts, MVWSD, LASD, and MVLA have plans to accommodate citywide growth. Although the MVWSD, LASD, and MVLA have master plans and strategies in place to expand capacity over time, the capacity enhancements planned by the districts do not identify specific numbers for anticipated capacity growth. However, the planning horizons of these documents do not extend throughout the Project buildout of 2050. Because the growth facilitated by the Project would occur gradually over several decades, it is reasonable to expect that these districts would update and revise their facilities plans periodically to respond to enrollment trends and future citywide development. Therefore, while the estimated student increase may appear substantial compared to current capacities and existing plans, the incremental nature of growth and the districts' ongoing planning processes indicate that future updates would accommodate long-term needs.

The specific placement and potential impacts of the new school facilities already proposed by the three school districts are unknown at this time; if construction or expansion of future facilities are needed, separate environmental review would be required, which could result in development and implementation of future project-specific mitigation measures. The R3 Zoning District Update facilitates development within areas of Mountain View that are currently developed. Therefore, construction of new school facilities, if required, would likely occur on property previously disturbed or developed which would reduce the potential for adverse impacts associated with construction of new or expanded school facilities associated with implementation of the R3 Zoning District Update. Moreover, growth facilitated by the R3 Zoning District Update would occur through 2050. As such, any potential expansion of MVWSD, LASD, and MVLA facilities would occur incrementally over time, and would require environmental review as they are identified.

Development facilitated by the R3 Zoning District Update would be required to comply with General Plan Policies POS-5.3 and Policy POS-5.4 which would ensure that the City coordinates with MVWSD, LASD, and MVLA on long range planning efforts to facilitate school district planning for future growth. As such, the City would work with MVWSD, LASD, and MVLA regarding new school land use needs by grade to ensure that new school facilities would accommodate anticipated student generation within Mountain View associated with R3 Zoning District Update buildout. Additionally, the City has established policies embedded in the San Antonio Precise Plan, North Bayshore Precise Plan, and East Whisman Precise Plan in support of a Citywide School Strategy to support local school districts through voluntary strategies related to shared open space, financial assistance through an off-site transfer of development rights program, and land dedication. (City of Mountain View 2025c).

Furthermore, future development facilitated by the Proposed Project would be required to pay state-mandated impact mitigation fees to provide funding for additional schools to serve the area, pursuant to Senate Bill 50. Pursuant to Section 65995(h) of the California Government Code the payment of statutory fees "… is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." The mandatory payment of impact mitigation fees would serve as full and complete mitigation for future development. Because the buildout facilitated by the R3 Zoning District Update would comply with the 2030 General Plan, which regulates the provision of school services concurrently with development and population growth, the Citywide School Strategy, and with payment of mandatory school impact fees by developers for future projects in the City, impacts related to provision of school services would be less than significant.

Mitigation Measures

No mitigation is required. Impacts would be less than significant without mitigation.

Threshold 1d:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?
Threshold 2:	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
Threshold 3:	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impact PS-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED PARKS, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, TO MAINTAIN ACCEPTABLE SERVICE RATIOS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Project does not include construction of new parks or recreational facilities. Future residents of development facilitated by the Project would be anticipated to use any of the City's 46 urban parks. Residents in the Project area would also use hiking trails in the city and may use parks in Los Altos, Los Altos Hills or Sunnyvale due to the proximity to the Project area.

As described in Section 4.12.1(d), the City aims to provide 3 acres of parkland per 1,000 residents. With a current population of 86,513, the Proposed Project would result in an increase of up to 32,000 residents, with cumulative growth resulting in a total anticipated population of 177,800 residents in 2050. The City currently provides 390.51 acres of total park land and open space, for a ratio of 4.51 acres of parks per 1,000 residents (City of Mountain View 2025b, DOF 2025).[3] With full buildout of development facilitated by the Project and anticipated cumulative growth, the City's parkland ratio would decrease to 2.20 acres per 1,000 residents, which is below the City's target.

[3] (390.51 acres / 86,513 residents in 2025) = 0.00451 acres per resident x 1,000 = 4.51 acres per 1,000 residents

Although the City calculates its park land service ratio based on only 390.51 acres of developed park land, the broader inventory of publicly owned open space and special-use areas totals approximately 1,036.88 acres. If this entire inventory were considered, the current service ratio would be approximately 11.99 acres per 1,000 residents, decreasing to 5.83 acres per 1,000 residents with full buildout of the Proposed Project and cumulative growth. While these areas are not officially counted toward the City's park land standard, they represent a significant land resource that could potentially be activated or repurposed for recreational use over time, although subject to feasibility and environmental constraints.

While the R3 Zoning District Update would lead to increased utilization of existing parks and recreational amenities, future development facilitated under the Project would be required to comply with the City's Parkland Dedication Ordinance (Mountain View City Code Chapter 41). This ordinance mandates either the dedication of land or the payment of an in-lieu fee, which is allocated toward acquiring, developing, or enhancing park and recreational facilities in proximity to the new development. Compliance with this requirement would ensure that additional parkland is provided to future residents in the city and that existing facilities are maintained even with the incremental increase in use of existing facilities that would occur with buildout of the R3 Zoning District Update. In addition, the City receives funding for parks and recreation development, enhancement, and maintenance through its Capital Improvement Plan Reserve and Construction/Conveyance Tax Fund, Shoreline Regional Community Fund, and various grants (City of Mountain View 2014). (City of Mountain View 2014). Although regional parks may experience greater use, this would not result in a significant or accelerated decline in their physical condition, as these larger facilities are designed to accommodate regional recreational needs. Additionally, open space created through project-specific requirements would help offset some of the increased demand for recreational resources from new residents. Furthermore, the City's 2025 Draft Parks and Recreation Strategic Plan identifies new park development as a priority for underserved areas in particular and notes that specific parcels that have already been purchased or dedicated for future parks, totaling 11.24 acres of new parks plus a 9-acre extension to the Stevens Creek Trail. While the Draft Plan acknowledges funding constraints in meeting the City's established goal of 3.0 acres of parkland per 1,000 residents, it outlines strategies to secure additional funding through bond measures, impact fees, and partnerships. Although the Proposed Project would gradually reduce the City's parkland per resident ratio through 2050, the Draft Plan is intended to guide improvement over the next 10 to 15 years (City of Mountain View 2025b). Therefore, while the Draft Plan acknowledges challenges in maintaining the service ratio, periodic updates are anticipated to address citywide growth and evolving conditions.

The specific placement and potential impacts of new parks and recreational facilities, whether developed pursuant to the Draft Parks and Recreation Strategic Plan or to accommodate citywide growth facilitated by the R3 Zoning District Update, are unknown at this time because the actual buildout patterns and timing of development facilitated by the Project cannot currently be predicted. Therefore, it would be speculative to assess the environmental impacts of such facilities at this stage.

The R3 Zoning District Update facilitates development within areas of Mountain View that are currently developed. Construction of new public facilities, if required, would likely occur on property previously disturbed or developed which would reduce the potential for adverse impacts associated with construction of new or expanded public facilities associated with implementation of the R3 Zoning District Update. If construction or expansion of future facilities are needed or proposed,

separate environmental review would be required that could determine and require future project-specific construction-related mitigation measures.

As a result, the potential for accelerated wear and tear on parks and recreational facilities would be considered less than significant. Finally, future construction of new or expanded parks and recreation facilities in the city would be subject to CEQA review at the time a site is identified and a specific design proposed. Impacts would therefore be less than significant.

Mitigation Measures

No mitigation is required. Impacts would be less than significant.

Threshold 1e:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, or the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-5 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OF NEW OR PHYSICALLY ALTERED LIBRARY FACILITIES TO MAINTAIN ACCEPTABLE SERVICE OBJECTIVES, AS NEW DEVELOPMENT WOULD BE URBAN INFILL THAT WOULD OCCUR GRADUALLY OVER TIME. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The R3 Zoning District Update could allow for up to 16,000 residential units and facilitate the addition of 32,000 new residents in Mountain View. The Proposed Project does not include designation of additional land for libraries, community centers, senior centers, or other public facilities within the city that would require construction and might have an adverse physical effect on the environment. The Mountain View Public Library could need to incrementally increase their library services to the City of Mountain View through the year 2050, which could in turn require the construction of new facilities to accommodate subsequent library visitors and facility space. The specific placement and potential impacts of new library facilities are unknown at this time because the actual buildout patterns and timing of development facilitated by the Project cannot currently be predicted. Therefore, it would be speculative to assess the environmental impacts of such facilities at this stage.

The R3 Zoning District Update facilitates development within areas of Mountain View that are currently developed. Construction of new public facilities, if required, would likely occur on property previously disturbed or developed which would reduce the potential for adverse impacts associated with construction of new or expanded public facilities associated with implementation of the R3 Zoning District Update. If construction or expansion of future facilities are needed or proposed, separate environmental review would be required that could determine and require future project-specific construction-related mitigation measures.

Additionally, there are several policies in the Mountain View City Code and 2030 General Plan to facilitate the maintenance of adequate public facilities concurrently with development and population growth. Future development associated with the R3 District Zoning Update would be expected to comply with goals and policies in the Parks, Open Space, and Community Facility and Land Use and Design Elements of the 2030 General Plan. General Plan Policy POS-9.3 would ensure that existing public facilities, including libraries and community centers, are adequately maintained over time, while Policy POS-9.2 would support the design of new facilities to respond to evolving community needs. In addition, the Project is aligned with Policy LUD-3.2 which promotes the

integration of public amenities and services within walkable, mixed-use neighborhoods to enhance access to essential services. With compliance with the goals and policies included in the 2030 General Plan and City of Mountain View City Code, impacts related to public facilities, including libraries and community centers, associated with development facilitated by the R3 Zoning District Update would be less than significant.

Mitigation Measures

No mitigation is required. Impacts would be less than significant without mitigation.

4.12.4 Cumulative Impacts

IMPACT PS-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD NOT RESULT IN A CUMULATIVELY SIGNIFICANT IMPACT ON FIRE PROTECTION SERVICES, POLICE PROTECTION SERVICES, SCHOOL FACILITIES, LIBRARY SERVICES, OR PARKS AND RECREATIONAL FACILITIES. CUMULATIVE PUBLIC SERVICES IMPACTS WOULD BE LESS THAN SIGNIFICANT, AND THE CONTRIBUTION OF THE PROJECT WOULD NOT BE CUMULATIVELY CONSIDERABLE.

Fire Protection

The geographic scope for cumulative fire protection impacts is the service area of the MVFD. This geographic scope is appropriate because development facilitated by the Project will increase the demand for this department. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1, would have the potential to adversely impact fire protection facilities.

Cumulative development in Mountain View would result in residential development. This type of development would increase the permanent resident and daytime population of the city. The increase in population would result in an increased demand for fire protection facilities. However, the need for fire protection services is gradual as development occurs. Cumulative developments would be in compliance with the California Fire Code, Part 9 of the CBC and would follow standards for fire safety such as fire flow requirements for buildings, fire hydrant location and distribution criteria, automated sprinkler systems, and fire-resistant building materials. For these reasons, although cumulative development may result in the need to construct new or expand existing fire protection or emergency medical service facilities beyond those anticipated for expected population growth, such construction or expansion would occur within previously developed or disturbed land, minimizing the potential for adverse environmental impacts associated with the construction or expansion of facilities. In addition, this potential development would align with State and local regulations.. Therefore, the cumulative impact related to fire protection facilities would be less than significant

Police Protection

The geographic scope for cumulative police protection impacts is the MVPD service area, which includes the Project area. This geographic scope is appropriate because development facilitated by the Project will increase the demand from the MVPD. Cumulative buildout in this region, including projects listed in Table 3-1, would have the potential to adversely impact police facilities.

The increase in population and development would result in an increased demand for police protection facilities. Cumulative plans and projects within the service area of the MVPD would be reviewed for impacts on police protection services, would be required to address any potential

impacts with mitigation, and would need to provide adequate emergency access for police services with proper signage and lighting. Demand for law enforcement services is highly dependent on a number of factors that vary substantially by project (clientele, hours of operation, crime prevention measures, etc.).Although the Project would result in an increased demand for police protection facilities, development would be staggered through 2050, giving the City substantial time to plan for increased demand and construct new facilities as needed. Therefore, the cumulative impact related to police protection facilities would be less than significant.

Schools

The geographic scope for cumulative school impacts is the MVLA, LASD, and MVWSD boundaries. This geographic scope is appropriate because development facilitated by the Project will increase the demand on the districts' services and facilities. Cumulative buildout in this region, including projects listed in Table 3-1, would have the potential to adversely impact schools.

Cumulative impacts would occur if growth within a district would result in significant adverse physical impacts with the provisions for, or the need for, new or physically altered school facilities. Although cumulative development would increase enrollment across the local school districts, each district has adopted long-term strategies to address cumulative citywide growth. MVWSD's Master Facilities Plan calls for two new elementary schools and expanded middle school capacity, with potential sites identified in North Bayshore and East Whisman (MVWSD 2019). LASD's Master Plan includes acquisition of a 10th school site in Mountain View and conversion of junior highs to accommodate 6th graders, thereby reducing constraints on elementary schools, along with permanent classroom replacements (LASD 2020). MVLA's Facilities Master Plan identifies the construction of 29 new classrooms and expanded student services buildings as planned strategies to accommodate additional capacity (MVLA 2018). These plans are supported by bond programs and partnerships, and are intended to address citywide growth, not just growth facilitated by the Proposed Project. Although the planning horizons of these documents likely do not extend through the Project's anticipated buildout year of 2050, growth facilitated by the Project would occur gradually over several decades, allowing districts to update and revise their plans periodically to address enrollment trends and future cumulative development. Cumulative projects would increase enrollment in the districts; however, pursuant to Government Code Section 65997, payment of school fees by development constitutes adequate CEQA mitigation. Because the districts have adequate capacity to serve cumulative development in its service area, cumulative impacts would be less than significant, and the Project would not result in a considerable contribution to cumulative impacts related to schools.

Libraries

The geographic scope for cumulative library impacts is the Mountain View Public Library service area, which is the City limits. This geographic scope is appropriate because development facilitated by the Project would increase the demand on library services. Cumulative buildout in this region, including projects listed in Table 3-1, would have the potential to adversely impact libraries.

Cumulative impacts could occur if growth within the system requires the construction of new or the expansion of an existing library that would result in adverse physical impacts. Cumulative population growth, including the Proposed Project, would increase the demand for new libraries. However, cumulative projects are expected to increase demand on existing library facilities. The Proposed Project in conjunction with other cumulative plans and projects listed in Table 3-1 would facilitate development in areas that are currently developed; therefore, construction of new Santa Clara

County and City of Mountain View Public Library facilities, if required, would likely occur on property previously disturbed or developed. Additionally, cumulative development would be required to pay developer fees that would support the maintenance and expansion of the local library system. This would reduce the potential of adverse construction impacts associated with construction of new or expanded library facilities. Therefore, the cumulative impact related to library facilities would be less than significant.

Parks

The implementation of the proposed plan in conjunction with the cumulative plans and projects listed in Table 3-1 would result in residential and commercial developments in and near Mountain View. Such cumulative development would be expected to permanently increase residents, which would increase cumulative demand for park facilities. The greater use of parks and recreational facilities in Mountain View could result in physical deterioration of existing parks. However, population growth is only one factor in determining whether parks and recreational facilities would deteriorate through increased use. Other variables include park design, age, infrastructure, and park use. To further offset demand, projects would be required to demonstrate compliance with applicable design guidelines established in the 2030 General Plan and Mountain View City Code. In addition, cumulative development would be subject to parkland dedication requirements or in-lieu parkland fees. Mountain View also continues to retain, enhance, and expand park and recreation facilities throughout the City limits, as well as continues to assess its current and future park needs. With payment of park impact fees by cumulative development, there would be limited potential physical deterioration of existing parks and recreational facilities due to increased use. Therefore, the cumulative impact related to recreational and park facilities would be less than significant.

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4.13 Transportation

The section discusses the environmental and regulatory setting related to transportation; the criteria used to determine the significance of environmental impacts; and potential impacts related to transportation that would result from implementation of the Project. This analysis is based on the *Transportation Analysis for the Environmental Review* (Transportation Analysis) prepared by Fehr & Peers in August 2025 (Appendix C). Future projects in Mountain View would be subject to individual Transportation Analysis CEQA review.

4.13.1 Setting

Existing Transportation System

Roadway System

Mountain View is served by a well-developed network of regional highways and local arterials. Regional connectivity is provided by United States Route 101 (US 101), State Route (SR) 85, and SR 237, all of which are identified in the City's General Plan as major transportation corridors. Within city limits, important local thoroughfares include Central Expressway, El Camino Real (SR 82), Shoreline Boulevard, Middlefield Road, and Moffett Boulevard. These routes provide primary access to and through the R3 Zoning District. An overview of key roadways in Mountain View is provided below:

- **US 101** is a major north-south corridor linking San Francisco and San Jose. In Mountain View, it ranges from eight to ten lanes, with high-occupancy vehicle (HOV) or express lanes in both directions depending on the segment.
- **SR 85** connects US 101 in Mountain View to San Jose, serving as a bypass route through the South Bay. The segment through Mountain View is six lanes wide, including HOV lanes.
- **SR 237** functions as an east-west connector between Mountain View and Interstate (I)-880 in Milpitas. It transitions from express lanes east of Mathilda Avenue to general-purpose lanes west of it.
- **Central Expressway** is an east-west express corridor providing regional access parallel to the Caltrain rail line. In Mountain View, it features two travel lanes in each direction and does not include sidewalks or formal bike lanes.
- **El Camino Real (SR 82)** is a key commercial and transit corridor through Mountain View. The corridor generally includes six travel lanes, a landscaped median, Class IV protected bike lanes in segments, signalized intersections with turn pockets, ADA-accessible sidewalks, and high-visibility crosswalks.
- **Shoreline Boulevard** extends north from El Camino Real across US 101 toward Shoreline Park. It has four lanes with continuous bike lanes, sidewalks, and landscape medians with turning bays.
- **Moffett Boulevard** is a north-south arterial linking downtown Mountain View and US 101. It generally includes four travel lanes, Class II bike lanes, and continuous sidewalks.
- **Middlefield Road** runs parallel to US 101 and provides local east-west connectivity. It includes landscape medians, part-time Class II bike lanes, sidewalks, and neighborhood-serving commercial frontages.

- **Rengstorff Avenue** is a major north-south arterial crossing Central Expressway and Caltrain. It includes four to six travel lanes, Class II bike lanes, sidewalks, and signalized intersections.
- **San Antonio Road** is a regional arterial linking US 101 and El Camino Real. In Mountain View, it includes six travel lanes, sidewalks, and intermittent Class II bike lanes.
- **California Street** is an east-west corridor parallel to El Camino Real. It has one travel lane in each direction, Class IV protected bike lanes, sidewalks, and signalized intersections with enhanced crosswalks.

Bicycle Facilities

Mountain View maintains a citywide bikeway network made up of several facility types that support cycling. Key bicycle lanes in Mountain View include the following:

- **Class I Multi-Use Paths** offer fully separated facilities for bicyclists and pedestrians. Notable Class I trails in Mountain View include:
  - Segments of the Stevens Creek Trail;
  - Permanente Creek Trail;
  - Hetch Hetchy Trail; and
  - The Shoreline Boulevard Trail between Wright Avenue and Villa Street
- **Class II Bike Lanes** are striped lanes adjacent to travel lanes, often supplemented by buffers for additional separation. These are found along corridors such as Shoreline Boulevard, Moffett Boulevard, Whisman Road, Ellis Street, and San Antonio Road, among others.
- **Class III Bike Routes** use shared roadway markings and signage to indicate bike priority. These routes serve local streets such as Dale Avenue, Pioneer Way, and sections of Shoreline Boulevard.
- **Class IV Separated Bikeways** provide protected on-street bicycle travel through physical barriers. While limited in extent, these facilities are planned for expansion consistent with regional active transportation goals. Although they extend beyond Mountain View into Los Altos and Palo Alto, examples of Class IV bike lanes in Mountain View include El Camino Real between Sylvan Avenue and Rengstorff Avenue and California Street from Showers Drive to Shoreline Boulevard.

Pedestrian Facilities

The pedestrian environment in Mountain View includes a robust system of sidewalks, crosswalks, curb ramps, and signalized crossings. Nearly all arterial and collector streets have sidewalks on at least one side, although some residential streets south of El Camino Real and west of San Antonio Road lack complete pedestrian improvements. Major off-street paths such as Stevens Creek and Permanente Creek trails serve both recreational and commuting purposes, offering safe, continuous pedestrian access through key corridors.

Transit Facilities

Mountain View is served by an integrated network of transit agencies, including Mountain View Transportation Management Association (MVgo), the Santa Clara Valley Transportation Authority (VTA), Caltrain, and local shuttles. Together, these services offer connections within the city and across the county. Transit routes that run throughout Mountain View are briefly described below.

FIXED-ROUTE BUS

VTA provides local, express, and rapid bus service throughout Mountain View, including frequent connections along El Camino Real which the City's General Plan identified as a high-quality transit corridor.

LIGHT RAIL AND COMMUTER RAIL

The VTA Orange Line (Light Rail) runs from Mountain View to Alum Rock, with service operating throughout the day at 15-minute intervals. Caltrain offers commuter rail service along the Peninsula Corridor, with frequent weekday service to San Jose and San Francisco and weekend operations at reduced headways.

LOCAL SHUTTLES

MVgo Shuttles and the Mountain View Community Shuttle provide last-mile connections and circulator service within the city. These services run on fixed routes. These transit services are listed in greater detail, including destination, schedule, and frequency, in Table 4.13-1.

Table 4.13-1 Existing Transit Services

Route	Route Description	Weekday Hours of Operation	Headways (minutes)
VTA Bus Routes			
Local Route 22	Palo Alto Transit Center – Eastridge	4:30am-2:00am	15
Rapid Route 522	Palo Alto Transit Center – Eastridge	5:00am-11:00pm	15
Express 104	Milpitas BART – Stanford Research Park	6:06 AM – 7:54 AM; 4:02 PM – 5:41 PM	30 – 50
Local Route 21	Palo Alto Transit Center – Santa Clara Transit Center	6:00am-9:30pm	30
Local Route 40	Foothill College – Mountain View Transit Center	6:30am-10:00pm	30
Local Route 51	Moffett Field – West Valley College	6:00 AM – 7:30 PM	30
Local Route 52	Foothill College – Mountain View Transit Center	7:00am-7:00pm	30
Local Route 53	Sunnyvale Transit Center – Santa Clara Transit Center	6:30am-7:30pm	30
MVgo Shuttle and Mountain View Community Shuttle			
MVgo Shuttles (A, B, C, D)	Mountain View Transit Center – throughout Mountain View	6:22am–10:47am; 3:07pm–7:33pm	20 – 45
MV Community Shuttle	Throughout Mountain View	7:00 AM – 7:00 PM	30
VTA Light Rail Transit and Caltrain Commuter Rail			
LRT Orange Line	Mountain View – Alum Rock	5:00am-12:00mid	15
Caltrain	Gilroy – San Francisco	4:22 AM – 1:46 AM	10 – 40

Source: Appendix C

4.13.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations related to transportation and circulation that are applicable to the Project.

b. State Regulations

California Department of Transportation

The California Department of Transportation (Caltrans) is responsible for the planning, design, construction and maintenance of all interstate freeways and state routes, including U.S. 101. Caltrans builds, maintains, and operates the State Highway System in California with a goal to facilitate the safe and efficient use of the state transportation system for all users. Caltrans sets standards in its 2020 *Transportation Impact Study Guide* that focus on the vehicle miles traveled (VMT) metric. The document is intended to be a reference and informational document that aligns with the standards and thresholds established in the Governor's Office of Land Use and Climate Innovation (LCI; formerly titled the Governor's Office of Planning and Research) *Technical Advisory on Evaluating Transportation Impacts in CEQA*. This document is available to be used by local governments to uniformly review transportation analysis and assess the operational standards of Caltrans-maintained facilities. The 2020 *Transportation Impact Study Guide* acts as a replacement for the 2002 *Guide for the Preparation of Traffic Impact Studies* but is only intended to be used with local land use projects and plans, not to be used for transportation projects on the State Highway System.

Senate Bill 743

Senate Bill (SB) 743, which was signed into law in 2013, directed LCI to develop revisions to the CEQA Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics instead of traffic level of service. SB 743 requires the new criteria to "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." It also states that alternative measures of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." SB 743 changes the way that public agencies evaluate the transportation impacts of projects in accordance with CEQA by recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (see Pub. Resource Code, Section 21099, subd. [b][2]).

On January 20, 2016, LCI released the Revis*ed Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing SB 743,* which had been released on August 6, 2014. Of note was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency finalized the updates to the CEQA Guidelines, and the updated guidelines became effective on December 28, 2018.

c. Local Regulations

Plan Bay Area 2050

Plan Bay Area 2050 is a joint regional planning document overseen by the Metropolitan Transportation Commission and the Association of Bay Area Governments (ABAG). It serves as the region's Sustainable Communities Strategy (SCS) pursuant to SB 375 and the 2050 Regional Transportation Plan (preceded by Plan Bay Area 2040) and integrates four elements (Housing, Economy, Transportation, and Environment) and five guiding principles (affordable, connected, diverse, healthy, and vibrant) to manage greenhouse gas emissions and plan for future population growth. Most of the investments are directed toward residents of Equity Priority Communities or other systematically underserved communities. The plan envisions investment in affordable housing production and preservation, a universal basic income to support residents' essential needs, investments in means-based transit fare discounts, and subsidies to protect homes and businesses from natural hazards. Strategies within Plan Bay Area include strategies aimed at housing production, improving mobility, creating safe streets, reducing greenhouse gas emissions, and expanding access to parks and open space. Major transit projects included in Plan Bay Area 2050 include a Bay Area Rapid Transit extension to San José/Santa Clara, Caltrain electrification, enhanced service along the Amtrak Capitol Corridor, and expanded local and express bus services.

Metropolitan Transportation Commission Transit-Oriented Communities Policy

The MTC adopted the Transit-Oriented Communities (TOC) Policy by Resolution 4530 on September 28, 2022, later revised in October 2023; it updates the 2005 regional TOD policy and implements Plan Bay Area 2050 by setting clear expectations for land use near transit. The policy applies to areas within one-half mile of existing and planned stations and stops, including regional and commuter rail, light rail, bus rapid transit, and ferries. Jurisdictions may use compliance with this policy to qualify for certain MTC funding.

The TOC Policy organizes requirements into four elements: minimum residential and office densities for new development, affordable housing production and preservation with anti-displacement and small-business stabilization measures, parking management, and transit station access and circulation. The policy's scope is regionwide, covering more than 400 stations and stops across roughly 80 Bay Area jurisdictions, and is intended to align local zoning and investment with ridership, equity, and climate objectives.

Santa Clara VTA Valley Transportation Plan 2040

Santa Clara VTA, the countywide transportation authority, has adopted the Valley Transportation Plan 2040 (VTP 2040 Plan; adopted in October 2014) that describes all major projects and initiatives expected to occur in the next 20 years. It prioritizes complete streets, express lanes, light rail effectiveness upgrades, bus rapid transit, and bicycle/pedestrian improvements.

The VTA 2040 Plan also includes a package of projects in the City of Mountain View: the Tasman Express Light Rail Improvement Project upgrades track and signal infrastructure along the Tasman corridor to introduce a peak-period express service between Mountain View and Santa Clara; the SR 85 Express Lanes project converted the existing single carpool lanes to express lanes on US 101 from near SR 237 to SR 85 in Mountain View and SR 85 from SR 237/Grant Road to the US 101/SR 85 interchange; the Rengstorff Avenue Grade Separation depresses Rengstorff Avenue beneath the Caltrain tracks and realigns the intersection with Central Expressway to remove the at-grade

crossing and improve safety; and the Citywide Traffic Signal Upgrade and IP Traffic Signal Access project which proposed to replace outdated signal controllers and deploying new software and internet-based communications to enhance citywide traffic management. Together these investments advance VTP 2040 Plan goals for faster transit, reliable express lanes, and safer multimodal travel within Mountain View.

Santa Clara Countywide Bike Plan

The Santa Clara Countywide Bicycle Plan's primary goal was to make it easier and safer for people to bike when traveling from one city to the next in Santa Clara County. The plan establishes a network of Cross County Bikeway Corridors that will provide continuous, complete bike connections across the county. The plan also identifies locations where new and improved bicycle connections are needed across freeways, rail lines, and creeks. Lastly, the plan identifies ways to make it easier for people to use their bicycle with transit, including bicycle access to major transit stops, bicycle parking at stops, and bicycle accommodations on board.

Congestion Management Program Monitoring and Conformance

As the County's Congestion Management Agency (CMA), VTA is responsible for managing the county's blueprint to reduce congestion and improve air quality. VTA is authorized to set state and federal funding priorities for transportation improvements affecting the Santa Clara County Congestion Management Program (CMP) transportation system. CMP-designated transportation system components in Mountain View include a regional roadway network, a transit network, and a bicycle network. The CMP regional roadway network in Mountain View includes all state highways, county expressways, and some principal arterials, while the transit network includes rail service and selected bus service. The bicycle network focuses on the Cross County Bicycle Corridors, which is a network of 57 routes that are identified in the Santa Clara Countywide Bicycle Plan. The long-range countywide transportation plan and how projects compete for funding and prioritization are documented in the VTP 2040 Plan.

The Citywide Multimodal Improvement Plan (MIP), also referred to as the Deficiency Plan per state's CMP legislation, is a planning document that identifies measures to improve transportation conditions on the CMP network instead of making physical traffic capacity expansions such as widening intersections or roadways. The MIP is based on the VTA Deficiency Plan Requirements, which describe the required content, actions, and implementation standards to assist member agencies with deficiency plan preparation and responsibilities. The City of Mountain View adopted a transportation impact fee to implement the MIP.

City of Mountain View General Plan 2030

The City of Mountain View General Plan 2030 includes mobility goals aimed to enhance travel by all modes by encouraging use by non-auto modes and thus reducing vehicle trips. The goals and policies include topics of complete streets, accessibility, walkability, bike ability, public transit, safe routes to school, vehicle parking, performance measurements, greenhouse gas emissions and air quality, and vehicles and roadway style efficiency. Applicable policies are listed below:

Goal LUD-3: A diverse, balanced and flexible mix of land uses that supports a strong economy, complete neighborhoods, transit use and community health.

> **Policy LUD 3.1: Land use and transportation.** Focus higher land use intensities and densities within a half-mile of public transit service, and along major commute corridors.

Policy LUD 3.2: Mix of land uses. Encourage a mix of land uses, housing types, retail and public amenities and public neighborhood open spaces accessible to the community.

Policy LUD 3.3: Health. Promote community health through land use and design.

Policy LUD 3.4: Land use conflicts. Minimize conflicts between different land uses.

Policy LUD 3.5: Diversity. Encourage residential developments serving a range of diverse households and incomes.

Policy LUD 3.6: Access to healthy food choices. Ensure all neighborhoods have access to healthy food choices at grocery stores within walking or bicycling distance.

Policy LUD 3.7: Upgraded commercial areas. Encourage the maintenance, enhancement and redevelopment of older commercial districts, shopping centers and corridors.

Policy LUD 3.8: Preserved land use districts. Promote and preserve commercial and industrial districts that support a diversified economic base.

Policy LUD 3.9: Parcel assembly. Support the assembly of smaller parcels to encourage infill development that meets City standards and spurs neighborhood reinvestment.

Policy LUD 6.2: Pursue equitable distribution of community amenities, public facilities and services within walking distance of residential neighborhoods.

Policy LUD 6.3: Encourage building facades and frontages that create a presence at the street and along interior pedestrian paseos or pathways.

Policy LUD 6.5: Support pedestrian and bicycling improvements and connections between neighborhoods.

Policy LUD 8.3: Enhanced publicly-accessible bicycle and pedestrian connections. Encourage new and existing developments to enhance publicly-accessible bicycle, pedestrian and transit connections.

Policy LUD 9.1: Height and setback transitions. Ensure that new development includes sensitive height and setback transitions to adjacent structures and surrounding neighborhoods.

Policy LUD 9.3: Ensure that development enhances public spaces through these measures:

- Encourage strong pedestrian-oriented design with visible, accessible entrances and pathways from the street.
- Encourage pedestrian-scaled design elements such as stoops, canopies and porches.
- Encourage connections to pedestrian and bicycle facilities.
- Locate buildings near the edge of the sidewalk.
- Encourage design compatibility with surrounding uses.
- Locate parking lots to the rear or side of buildings.
- Encourage building articulation and use of special materials to provide visual interest.
- Promote and regulate high-quality sign materials, colors and design that are compatible with site and building design.
- Encourage attractive water-efficient landscaping on the ground level.

Housing Element Policy 1.2: Encourage a mix of housing types, at a range of densities, that serves a diverse population, including rental and ownership units serving both young and

mature families, singles, young professionals, single-parent households, seniors, and both first-time and move-up buyers, at a broad range of incomes, through development policies and City-subsidized affordable housing.

Housing Element Policy 1.3: Maintain or improve the character and quality of neighborhoods through upgrades to existing developments, sensitively designed new developments, improved streetscapes, and better access to schools, parks, goods, services, jobs, transportation, and other needs.

Housing Element Policy 1.5: Periodically evaluate the City's development standards, review processes and, if necessary, remove unnecessary barriers to quality housing for all income levels.

AccessMV

AccessMV is a modal plan created by the City to provide a consistent vision for the City's multimodal transportation network. This plan aims to identify the city's primary transportation network for all modes and prioritizes previously identified transportation improvement projects. The city has analyzed bicycle level of traffic stress, pedestrian quality of service, and potential transit demand.

Mountain View Vision Zero Policy

On December 10, 2019, the Mountain View City Council unanimously adopted a Vision Zero Policy to eliminate fatal traffic collisions in Mountain View by 2030. Vision Zero is an integrated set of policies, plans, and programs based on the philosophy that fatal collisions are unacceptable and often preventable.

Mountain View's Vision Zero approach is to eliminate fatal and severe injury traffic collisions among all road users, including those walking, biking, and driving. This approach is working to eliminate fatal traffic collisions by 2030, working to decrease traffic collisions involving fatalities or severe injuries by 50 percent by 2030 from a 2016 baseline of 15 collisions; and working to decrease the three-year annual average number of people killed or severely injured in collisions by 15 percent every three years from a current three-year annual average baseline of 19 people.

Mountain View Adopted VMT Policy

On June 30, 2020, the City Council of Mountain View passed Resolution 18484 which established the City's implementation policy for SB 743. This resolution replaced level of service with VMT as the primary metric for CEQA transportation analyses. Under Mountain View's VMT policy, projects located within transit priority zones and traffic analysis zones already performing at or below a 15 percent below-average VMT threshold are eligible for streamlined CEQA review, provided the proposed land use and scale align with additional policy requirements-.

Mountain View City Code

Chapter 14, Article 1 of the City Code is the fire prevention code which details, among other standards, required access widths and vertical clearances for emergency vehicles. Specifically, the code requires fire apparatus access roads to have an unobstructed width of a minimum 20 feet and an unobstructed vertical clearance of a minimum of 13 feet 6 inches. When buildings have floors used for occupancy located more than 30 feet above the access road, the minimum width requirement for access roads is increased to 26 feet.

4.13.3 Impact Analysis

Methodology and Significance Thresholds

Methodology

This analysis is based on the Transportation Analysis prepared by Fehr & Peers in August 2025 (Appendix C). As described in Section 4.13.2, *Regulatory Setting,* to implement SB 743, the *CEQA Guidelines* have been updated to change the criteria for determining what constitutes a significant traffic-related environmental impact to rely upon measurement of quantification of VMT instead of LOS. As of July 1, 2020, the VMT-based approach in Section 15064.3 of the *CEQA Guidelines* applies statewide for the purpose of assessing traffic-related impacts under CEQA. As a result, this analysis uses the metric of VMT to determine the Project's traffic-related impact.

The VMT impact analysis for the Project considers the potential to influence VMT through changes in residential density, location, and redevelopment patterns. The analysis follows a qualitative infill housing VMT assessment approach. The qualitative infill housing VMT assessment method was selected due to the uncertainty of the project-specific details regarding residential development facilitated by the Project. This approach allows for a more context-sensitive assessment of how the Project may influence travel behavior and transportation outcomes. Through this VMT assessment method, the City has identified that the following could result in a potentially significant impact related to VMT:

- Conversion of affordable units to market rate housing;
- Adding housing in high-VMT areas;
- Failure to increase residential density in targeted locations;
- Worsening the jobs-housing imbalance, and
- Inconsistency with the Plan Bay Area 2050 and its TOC policy.

The analysis considers potential impacts to VMT due to the potential for the conversion of affordable housing to market-rate housing, locating housing in high VMT area (i.e., parcels where VMT per capita exceeds the City's adopted project-specific threshold of 15 percent below the existing VMT rate for the region), and density increases.

Significance Thresholds

To determine whether a project would result in a significant impact relating to Transportation, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

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

Project Impacts and Mitigation Measures

Threshold 1:	Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact TRA-1 THE PROJECT WOULD NOT INCLUDE MODIFICATIONS TO EXISTING TRANSIT, ROADWAY, BICYCLE, OR PEDESTRIAN FACILITIES AND WOULD NOT INTERFERE WITH TRANSPORTATION PROJECTS IDENTIFIED IN EXISTING PROGRAMS, PLANS, ORDINANCES, OR POLICIES. THE PROJECT WOULD ALLOW FOR INCREASED RESIDENTIAL DENSITIES PROXIMATE TO TRANSPORTATION INFRASTRUCTURE, WHICH WOULD SUPPORT THE CITY'S GENERAL PLAN POLICIES. ACCORDINGLY, THE PROJECT WOULD HAVE A LESS THAN SIGNIFICANT IMPACT RELATED TO CONFLICTS WITH PROGRAMS, PLANS, ORDINANCES, OR POLICIES ADDRESSING THE CIRCULATION SYSTEM.

The Project is a legislative procedure that increases the allowable residential densities in areas served by existing transportation facilities. Discussions of the Project's potential to conflict with plans governing transit, roadway, bicycle, and pedestrian facilities are provided below.

Transit

The Project would increase allowable residential densities in areas served by existing VTA bus, light-rail routes, and Caltrain commuter rail. The Project would not modify transit rights-of-way, relocate transit stops, or alter supporting infrastructure. The Project would not interfere with the City's General Plan or projects identified in Play Bay Area 2050 such as the proposed BART extension to San José/Santa Clara, Caltrain electrification, enhanced service along the Amtrak Capitol Corridor, or expanded local and express bus services. Furthermore, the allowance of increased residential densities near transit infrastructure and along transit corridors would be consistent with City General Plan Mobility Element policies MOB 5.1 through MOB 5.6 related to increasing accessibility to transit and transit ridership. Accordingly, the Project would have a less than significant impact related to programs, plans, ordinances, and policies addressing transit facilities.

Roadway

The Project would increase allowable residential densities throughout Mountain View but would not include physical changes to the roadway network. The Project would not remove rights-of-way, relocate travel lanes, or interfere with the implementation of projects identified in Plan Bay Area 2050, the City's General Plan, or the Santa Clara County Congestion Management Program. Increased residential capacity could elevate vehicular demand on the roadway system. However, the City and regional agencies apply roadway management strategies, including traffic calming, signal coordination, and Complete Streets policies, which provide flexible, multi-modal solutions to manage any future traffic increases. As the Project allows for additional infill residential growth, the Project is anticipated to result in less reliance on vehicles which would be consistent with City General Plan Mobility Element policies MOB 1.1 through MOB 1.6. Accordingly, the Project would have a less than significant impact related to programs, plans, ordinances, and policies addressing roadway facilities.

Bicycle

The Project does not include modifications to existing bicycle facilities within rights-of-way. However, it will create various conditions where bicycling is improved in the City, including new connections through large blocks and bicycle-conscious development design The Project would not

interfere with the implementation of projects outlined in the VTP 2040 Plan, the Countywide Bicycle Plan, or regional bikeway improvements identified in Plan Bay Area 2050. The introduction of additional housing near established bikeways would provide an incentive for bicycle trips for commuting, recreation, and daily needs along corridors such as Shoreline Boulevard, Moffett Boulevard, and Rengstorff Avenue, among others. However, Mountain View's existing and planned bicycle infrastructure, combined with supporting policies, can accommodate this demand while improving active transportation safety and connectivity. Allowing for increased residential density in areas with existing bicycle infrastructure would provide access to facilitate bicycle travel for increased residents compared to existing conditions which could increase bicycling throughout the City, consistent with City General Plan Mobility Element policies MOB 4.1 through MOB 4.5. In addition, the Project would be required to comply with the City's Transportation Impact Fee program, which dedicates funding to bicycle and pedestrian improvements identified in adopted plans. Accordingly, the Project would have a less than significant impact related to programs, plans, ordinances, and policies addressing bicycle facilities.

Pedestrian

The Project does not include modifications to pedestrian facilities within rights-of-way. However, it could create various conditions where walking is improved in the City, including new connections through large blocks and pedestrian-friendly development design. The Project would not interfere with the implementation of the pedestrian projects identified in the Mountain View Pedestrian Master Plan, VTA's pedestrian improvement strategies, or Plan Bay Area 2050. Increasing allowable residential density in areas with existing pedestrian infrastructure would provide access for residences anticipated to be developed as a result of the Project, which in turn could increase walking in Mountain View. Increased pedestrian access would be consistent with City General Plan Mobility Element policies MOB 3.1 through MOB 3.5. Accordingly, the Project would have a less than significant impact related to programs, plans, ordinances, and policies addressing pedestrian facilities.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation measures are required.

Threshold 2:	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact TRA-2 THE PROJECT WOULD INCREASE ALLOWABLE RESIDENTIAL DENSITIES THROUGHOUT MOUNTAIN VIEW, PROMOTING HIGHER DENSITY RESIDENTIAL DEVELOPMENT COMPARED TO EXISTING CONDITIONS, WHICH WOULD RESULT IN CITYWIDE VMT REDUCTIONS. THEREFORE, THE PROJECT WOULD NOT CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3(B). THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The Project would increase allowable residential densities throughout Mountain View but would not include physical changes to infrastructure. As a result, the Project itself would not result in changes to VMT. However, the Project would facilitate future residential development, which could have potential to result in VMT increases. As described in *Methodology*, the analysis follows the City's qualitative infill housing VMT assessment approach and considers potential impacts to VMT due to the potential for the conversion of affordable housing to market-rate housing, locating housing in high VMT area, and density increases.

Affordable Housing

Converting affordable or rent-stabilized units to market-rate housing can increase VMT if lower-income households move out of lower-VMT areas due to redevelopment patterns making the housing supply unaffordable. However, existing City and State regulations would prohibit housing that could demolish affordable and rent-stabilized housing unless those units are replaced at a comparable affordability level. Accordingly, development facilitated from implementation of the Proposed Project would not result in substantial decreases in affordable housing in Mountain View. Therefore, the Project would not result in a net loss of affordable units, and project-specific development would be required to replace affordable units, which would ensure substantial VMT increases related to the removal of affordable housing would not occur.

Housing in High-VMT Areas and Residential Density

The Project would allow for increased residential densities in the R3 Zoning District, which spans across low-VMT areas (i.e., areas presumed to have a per capita VMT below project-specific VMT thresholds) and high-VMT areas. In low-VMT area, the Project would facilitate development that is proximate to existing transit and/or has a land use design that places residences and employment areas proximate to each other and emphasizes street connectivity. Within low-VMT areas, development facilitated by the Project is not anticipated to result in substantial VMT impacts based on the existing transit available to residents and proximity of residences to employment centers. Within high-VMT areas near transit, development facilitated by the Project is not anticipated to result in substantial VMT impacts as infill areas proximate to transit within Mountain View do not result in per capita VMT that exceeds the statewide averages, and the addition of housing proximate to transit is anticipated to encourage transit use and less dependence on vehicle travel.

Within high-VMT areas away from transit, development facilitated by the Project could result in substantial VMT based on the increased vehicle use and demand for further travel to employment and commercial centers compared to housing located closer to these areas. However, the Project would facilitate increased residential development within high-VMT areas. According to the California Air Pollution Control Officers Association 2021 *Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity,* increases in development density reduces VMT generation in the area (Appendix C). As described by the California Air Pollution Control Officers Association, multi-family infill developments that are denser than the existing neighborhood would be expected to generate less VMT than that of the surrounding neighborhood. As described in Table 2-1 of Chapter 2, *Project Description*, the proposed increases in densities would allow residential development ranging from 15 dwelling units per acre to 110 dwelling units per acre. Based on the increased allowable densities proposed as part of the Project, it is anticipated the Project could facilitate a citywide VMT reduction of approximately 30 percent (Appendix C). Accordingly, although the Project could facilitate development within a high-VMT area located away from transit, the Project is not anticipated to result in substantial VMT generation as the increased residential density facilitated by the Project would reduce VMT. Therefore, the Project would not conflict or be inconsistent with *CEQA Guidelines* section 15064.3(b). This impact would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation measures are required.

Threshold 3:	Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?
Threshold 4:	Would the project result in inadequate emergency access?

Impact TRA-3 INDIVIDUAL RESIDENTIAL DEVELOPMENTS THAT OCCUR AS A RESULT OF THE PROJECT WOULD BE SUBJECT TO CITY AND MOUNTAIN VIEW FIRE DEPARTMENT DESIGN STANDARDS WHICH WOULD ENSURE INDIVIDUAL DEVELOPMENTS WOULD NOT RESULT IN SUBSTANTIAL TRANSPORTATION HAZARDS OR INADEQUATE EMERGENCY ACCESS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The Project would increase allowable residential densities throughout Mountain View but would not include physical changes to existing transportation facilities. Accordingly, the Project itself does not have potential to substantially increase hazards due to a geometric design feature or incompatible uses, or to result in adequate emergency access. Individual residential developments that occur as a result of the Project would be required to be designed in accordance with the standards for vehicle ingress/egress and emergency access set forth within Chapter 14, Article 1 of City Code and the standards of the Mountain View Fire Department. The City and the Mountain View Fire Department would review and approve the design of individual residential projects, which would ensure such developments would minimize geometric hazards and provide adequate ingress/egress for emergency access. Compliance with applicable development standards would ensure residential developments would not substantially increase transportation hazards or provide inadequate emergency access. This impact would be less than significant.

Mitigation Measures

Impacts would be less than significant without mitigation. No mitigation measures are required.

4.13.4 Cumulative Impacts

IMPACT TRA-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD NOT RESULT IN A CUMULATIVELY SIGNIFICANT CONFLICT WITH APPLICABLE CIRCULATION PLANS, POLICIES, OR PROGRAMS AND WOULD NOT CREATE CUMULATIVELY SIGNIFICANT TRANSPORTATION SAFETY HAZARDS OR INADEQUATE EMERGENCY ACCESS; HOWEVER, CUMULATIVE DEVELOPMENT WOULD RESULT IN A SIGNIFICANT AND UNAVOIDABLE INCREASE IN VMT. ACCORDINGLY, CUMULATIVE TRANSPORTATION IMPACTS RELATED TO VMT WOULD BE SIGNIFICANT AND UNAVOIDABLE, AND THE CONTRIBUTION OF THE PROJECT WOULD BE CUMULATIVELY CONSIDERABLE.

The geographic scope for cumulative transportation impacts is the city of Mountain View. This geographic scope is appropriate for evaluating cumulative impacts related to transportation, as VMT thresholds are intended to apply citywide. Regional cumulative impacts consider impacts that would occur from the buildout of cumulative planning documents and reasonably anticipated projects identified in Chapter 3, *Environmental Setting*. The general approach to cumulative impact analysis used in this DEIR is discussed in Chapter 3, *Environmental Setting*.

With respect to conflicts with a program, plan, ordinance, or policy addressing the circulation system, a cumulative impact could occur if development within Mountain View along with development associated with the Proposed Project resulted in a conflicts existing plans such as Plan Bay Area 2050, the City's General Plan, the Santa Clara County Congestion Management Program, the VTP 2040 Plan, or the Countywide Bicycle Plan. Cumulative development in Mountain View would be subject to the same circulation-related programs, plans, ordinances, and policies as the

Proposed Project. Cumulative development would be required to demonstrate consistency with the City's General Plan and other applicable plans which guide the continued development and improvement of the transportation system in Mountain View. Additionally, all future discretionary projects in Mountain View would be subject to individual CEQA review which would minimize potential for cumulative development to result in conflicts with existing circulation system. Therefore, cumulative impacts related to conflict with a program, plan, ordinance, or policy addressing the circulation system would be less than significant.

A cumulative VMT impact would occur if cumulative development within Mountain View would result in any increase in citywide VMT per capita. As described in Chapter 3, *Environmental Setting*, given that cumulative growth in the Plan Bay Area 2050 region could result in 422,000 housing units by 2050, there is potential for growth to exceed VMT per capita thresholds. Accordingly, cumulative VMT impacts are considered potentially significant. Given Mountain View's threshold of no net increase in cumulative boundary VMT (VMT on all roadways in the region), even a small VMT increase would constitute a significant cumulative impact. A citywide zoning update introduces too much uncertainty, both in the amount of new housing (10,000 – 16,000 units) and in where those units may be located, for a parcel-based model to deliver reliable estimates. In the absence of project-specific travel modeling, the City has taken a conservative approach: it concludes that the Project could make a cumulatively considerable contribution to regional VMT under future conditions. This conclusion aligns with the City's General Plan EIR, which concluded that buildout of planned growth would result in significant and unavoidable transportation impacts.

The Transportation Analysis prepared by Fehr & Peers (Appendix C) identifies a cumulative VMT Mitigation Strategy aligned with the City's existing VMT framework. The strategy includes leveraging Project characteristics (e.g. promoting high-density, mixed-use development, and affordable housing to keep lower-income residents near jobs), enhancing multimodal infrastructure, implementing parking management policies known to reduce VMT, and deploying transportation demand management programs to reduce reliance on single-occupancy vehicles (e.g. transit subsidies, carpool incentives, and bike-share). These strategies are not project-specific mitigation measures under CEQA, but rather policy tools aligned with ongoing citywide efforts to reduce per-capita VMT. While these measures could substantially reduce per-capita VMT over time, they cannot feasibly eliminate the cumulative impact because they require citywide implementation and long-term coordination, and there are uncertainties regarding the exact locations of future development, evolving travel behavior, emerging technologies, and future infrastructure improvements that could influence per-capita VMT, which together limit the City's ability to rely on such strategies as CEQA mitigation. Therefore, no feasible project-level mitigation is available, and the Project's contribution to cumulative VMT would remain significant and unavoidable.

With respect to Impact TRA-3, a cumulative impact could occur if several development projects within Mountain View were constructed simultaneously, resulting in dangerous geometric hazards, incompatible uses on the roadways, or inadequate emergency access. Cumulative impacts related to transportation hazards and emergency access would be potentially significant. As discussed under Impact TRA-3, development facilitated by the Proposed Project would require to be designed in accordance with the requirements of Chapter 14, Article 1 of City Code and the design requirements of the Mountain View Fire Department. The City and the Mountain View Fire Department would review and approve the design of individual residential projects, which would ensure such developments would minimize geometric hazards and provide adequate ingress/egress for emergency access. Accordingly, the Proposed Project would not contribute to a cumulatively considerable impact associated with geometric design hazards, incompatible uses, or emergency access.

4.14 Tribal Cultural Resources

This section analyzes the potential impacts of implementation of the Project on tribal cultural resources. Tribal cultural resources are those resources identified by California Native American tribes in consultation with lead agencies during tribal consultation (also referred to as Assembly Bill [AB] 52 and Senate Bill [SB] 18 consultation).

4.14.1 Setting

Ethnographic Context

Mountain View lies within the traditional tribal territory of the Ohlone (or Costanoan) people. Ohlone territory extends along the California coast from the point where the San Joaquin and Sacramento Rivers merge into the San Francisco Bay extending to Point Sur. Their inland boundary was limited to the interior Coast Ranges (Kroeber 1925:462). The Ohlone language belongs to the Penutian family, with several distinct dialects throughout the region (Kroeber 1925:462). It is divided into eight regional dialects: Karkin, Chochenyo, Ramaytush, Awaswas, Taymen, Mutsun, Rumsen, and Chalon (Jones 2015)

The pre-contact Ohlone were semi-sedentary, with a settlement system characterized by base camps and seasonal reserve camps composed of tule reed houses with thatched roofs made of matted grass (Schick 1994; Skowronek 1998). Just outside base camps, large sweat houses were built into the ground near stream banks used for spiritual ceremonies and possibly hygiene (Schick 1994, Jones 2015). Villages were divided into small polities, each of which was governed by a chief responsible for settling disputes, acting as a war leader during times of conflict, and supervising economic and ceremonial activities (Skowronek 1998; Kroeber 1925:468). Social organization appeared flexible to ethnographers and any sort of social hierarchy was not apparent to mission priests (Skowronek 1998).

Archaeological investigations inform Ohlone mortuary rituals. Cemeteries were set away from villages and visited during the annual Mourning Anniversary (Leventhal and DiGiuseppe 2009). Ceremonial human grave offerings might include Olivella beads, as well as tools like drills, mortars, pestles, hammerstones, bone awls, and utilized flakes (Leventhal and DiGiuseppe 2009). Ohlone mythology included animal characterization and animism, which was the basis for several creation narratives. Ritually burying of animals, such as a wolf, squirrel, deer, mountain lion, gray fox, elk, badger, grizzly bear, blue goose, and bat ray, was commonly practiced. Similar to human burials, ceremonial offerings were added to ritual animal graves like shell beads, ornaments, and exotic goods (Kroeber 1925; Field and Leventhal 2003; Jones 2010).

Ohlone subsistence strategies were based on hunting, gathering, and fishing (Kroeber 1925:467, Skowronek 1998). Larger animals, like bears, might be avoided, but smaller game was hunted and snared on a regular basis (Schick 1944:17). Like it was for Tribal societies throughout California, the acorn was an important staple and was prepared by leaching acorn meal in openwork baskets and in holes dug into the sand (Kroeber 1925:467). The Ohlone also practiced controlled burning to facilitate plant growth (Kroeber 1925:467, Skowronek 1998). During specific seasons or in times of drought, the reserve camps would be utilized for gathering seasonal food and accessing food storage (Schick 1994). Fishing would be done with nets and gorge hooks out of tule reed canoes (Schick 1994:16-17). Mussels were a particularly important food resource. Sea mammals such as sea lions and seals were hunted and beached whales were exploited (Kroeber 1925:467).

Seven Franciscan missions were built within Ohlone territory in the late 1700s, and all members of the Ohlone group were eventually brought into the mission system (Kroeber 1925:462, Skowronek 1998). After the establishment of the missions, Ohlone population dwindled from roughly 10,000 people in 1770 to 1,300 by 1814 (Skowronek 1998). In 1973, the population of people with Ohlone descent was estimated at fewer than 300. The descendants of the Ohlone united in 1971 and have since arranged political and cultural organizations to revitalize aspects of their culture (Skowronek 1998). Today, the descendant communities of the Ohlone can be found in multiple tribes throughout Northern and Central California.

4.14.2 Regulatory Setting

a. Federal Regulations

Tribal cultural resources are a category of resource identified by State law; there are no federal regulations pertaining to tribal cultural resources.

b. State Regulations

Assembly Bill 52 of 2014

AB 52 expanded CEQA by defining a new resource category, "Tribal Cultural Resources." AB 52 establishes that "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (Public Resources Code [PRC] Section 21084.2). AB 52 further states when feasible, the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe," and meets either of the following criteria:

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

In recognition of California Native American sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments and with respect to the interests and roles of project proponents, it is the intent AB 52 to accomplish all of the following:

1. Recognize that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities.
2. Establish a new category of resources in CEQA called "tribal cultural resources" that considers the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation.

3. Establish examples of mitigation measures for tribal cultural resources that uphold the existing mitigation preference for historical and archaeological resources of preservation in place, if feasible.
4. Recognize that California Native American Tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated (because CEQA calls for a sufficient degree of analysis, tribal knowledge about the land and tribal cultural resources at issue should be included in environmental assessments for projects that may have a significant impact on those resources).
5. In recognition of their governmental status, establish a meaningful consultation process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning tribal cultural resources, early in the CEQA environmental review process, so that tribal cultural resources can be identified, and culturally appropriate mitigation and mitigation monitoring programs can be considered by the decision-making body of the lead agency.
6. Recognize the unique history of California Native American Tribes and uphold existing rights of all California Native American Tribes to participate in, and contribute their knowledge to, the environmental review process pursuant to CEQA.
7. Ensure that local and tribal governments, public agencies, and project proponents have information available, early in CEQA environmental review process, for purposes of identifying and addressing potential adverse impacts to tribal cultural resources and to reduce the potential for delay and conflicts in the environmental review process.
8. Enable California Native American Tribes to manage and accept conveyances of, and act as caretakers of, tribal cultural resources.
9. Establish that a substantial adverse change to a tribal cultural resource has a significant effect on the environment.

AB 52 also establishes a formal consultation process for California Tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. AB 52 requires that lead agencies "begin consultation with a California Native American Tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American Tribes to be included in the process are those that have requested notice of projects proposed in the jurisdiction of the lead agency.

Senate Bill 18

SB 18 of 2004 (California Government Code §65352.3) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a General Plan or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005), "The intent of SB 18 is to provide California Native American Tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

Senate Bill 35 and Assembly Bill 168

Enacted on September 29, 2017, SB 35 (California Government Code Section 65913.41) grants a ministerial approval process that expedites and facilitates construction of affordable housing projects without normal CEQA documentation. However, in May 2021, Assembly Bill 168 (AB 168), an act to amend Sections 65400, 65913.4, and 65941.1 of SB 35, was passed. AB 168 requires a pre-consultation process with Native American Tribes to identify and protect tribal cultural resources prior to the submission of an SB 35 permit for a housing development.

c. Local Regulations

Refer to Section *4.4 Cultural Resources* for a description of local regulations.

4.14.3 Impact Analysis

Methodology and Significance Thresholds

Methodology

In accordance with AB 52 and SB 18, the City conducted tribal consultation as the lead agency. The City's consultation efforts and subsequent communication with contacted tribes is summarized herein. AB 52 and SB 18 correspondence is included in Appendix B.

In addition, in accordance with AB 52, the City sent written communication regarding the Project via certified mail on August 20, 2025, to the Tamien Nation. In accordance with SB 18, the City also sent the following nine tribes written communication regarding the Project via certified mail on August 20, 2025:

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

Tribes have 30 days to respond and request consultation under AB 52 and 90 days to respond under SB 18. The AB 52 consultation request period for the above tribes ended on September 19, 2025 and the SB 18 consultation request period ended on November 18, 2025. The City received requests for consultation under AB 52 from Tamien Nation on September 10, 2025, and consultation under SB 18 from Muwekma Ohlone Tribe of the SF Bay Area on October 1, 2025.

Significance Thresholds

To determine whether a project would result in a significant impact to Tribal Cultural Resources, Appendix G of the CEQA Guidelines requires consideration of whether a project would 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 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.

Project Impacts and Mitigation

Threshold 1a:	Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?
Threshold 1b:	Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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?

Impact TCR-1 FUTURE DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT COULD AFFECT PREVIOUSLY UNIDENTIFIED TRIBAL CULTURAL RESOURCES. HOWEVER, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

As discussed above under "Methodology," as part of its tribal cultural resource identification process under AB 52, the City sent letters to nine Native American Tribes that are traditionally and culturally affiliated with the Project area on August 20, 2025. The City received requests for consultation under AB 52 from Muwekma Ohlone Tribe of the SF Bay Area and Tamien Nation. The AB 52 consultation period closed on September 19, 2025. Accordingly, AB 52 consultation is complete for the Project.

AB 52/SB 18 consultation carried out as part of this analysis has not identified known tribal cultural resources in the Project area. Nonetheless, ground-disturbing activities associated with individual development projects facilitated by the Proposed Project could expose previously unidentified subsurface archaeological resources that may qualify as tribal cultural resources and could be adversely affected by construction.

The provisions of AB 52 and AB 168 require Tribal consultation with local California Native American Tribes prior to implementation of project activities subject to CEQA or SB 35, respectively. In compliance with AB 52, a determination of whether project-specific substantial adverse effects on tribal cultural resources would occur along with identification of appropriate project-specific avoidance, minimization, or mitigation measures would be required. Although no tribal cultural resources were identified during consultation for the Proposed Project, due to the programmatic nature of the Proposed Project it is not possible to fully determine impacts of specific projects on specific future development sites. Effects on tribal cultural resources can only be known once a

specific project has been proposed, because the effects are dependent on both the individual project site conditions and the characteristics of the proposed activity.

As individual projects are proposed, if subject to CEQA, site-specific consultation in accordance with AB 52 and SB 35 would require project-specific tribal cultural resource identification and consultation, and the appropriate avoidance, minimization, or mitigation would be incorporated. Therefore, this impact would be less than significant with mitigation.

Mitigation Measures

The following mitigation measure is required:

TCR-1 Suspension of Work Around Potential Tribal Cultural Resources

In the event archaeological resources of Native American origin are identified during construction on the Change Area sites, all earth-disturbing work within 50 feet of the find shall be suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City of Mountain View, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with local Native American group(s). The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery. The City of Mountain View shall review and approve the plan prior to implementation.

Significance After Mitigation

Mitigation Measure TCR-1 would ensure that, if potential tribal cultural resources are encountered during construction, the find is treating in consultation with local Native Americans. With adherence to this measure, impacts would be less than significant.

4.14.4 Cumulative Impacts

Impact TCR-2 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD NOT RESULT IN A CUMULATIVELY SIGNIFICANT DISTURBANCE OF TRIBAL CULTURAL RESOURCES. CUMULATIVE TRIBAL CULTURAL RESOURCES IMPACTS WOULD BE LESS THAN SIGNIFICANT, AND THE CONTRIBUTION OF THE PROJECT WOULD NOT BE CUMULATIVELY CONSIDERABLE.

The geographic scope for cumulative tribal cultural resources impacts is the entirety of Mountain View in addition to the surrounding Bay Area. This geographic scope is appropriate because tribal cultural resources have the potential to extend across large areas. Cumulative buildout in this region, including projects listed in Table 3-1, would have the potential to significantly impact tribal cultural resources through the disturbance of areas with the potential to contain tribal cultural resources.

Projects facilitated by the Proposed Project in conjunction with other nearby past, present and reasonably foreseeable future projects could involve the cumulative disturbance of areas that may

contain tribal cultural resources. While there is the potential for significant cumulative impacts to tribal cultural resources, it is anticipated that potential impacts associated with individual cumulative projects would be addressed on a case-by-case basis and would be subject to State regulations regarding the treatment of tribal cultural resources. Therefore, with compliance with State regulations, the cumulative impact related to tribal cultural resources would be less than significant.

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4.15 Utilities and Service Systems

This section analyzes the effects of the proposed project on utilities and service systems. It considers potential impacts with respect to water supply and infrastructure, wastewater conveyance and treatment facilities, stormwater and drainage facilities, solid waste disposal, and electricity, natural gas, and telecommunications facilities. Baseline information and impact analysis, particularly related to water and wastewater infrastructure, is supported by a Utility Impact Study prepared by Schaaf & Wheeler Consulting Civil Engineers (Appendix G).

4.15.1 Setting

The following section describes the existing setting with respect to water suppliers, wastewater treatment providers, stormwater drainage facilities, solid waste facilities, electricity and natural gas providers, and telecommunications facilities serving Mountain View.

a. Water Supply

Water Service

Water service to Mountain View is provided by the City's municipal water utility, which serves residential, commercial, institutional, and industrial customers within the city limits. The City is a retail water provider and receives its water supply from a combination of wholesale sources and local groundwater. Mountain View's water system includes three pressure zones, three wholesale water turnouts, four potable water storage reservoirs with a total capacity of 14.3 million gallons, three pump stations, and four active groundwater wells. The City manages over 188 miles of buried pipelines ranging in diameter and age (City of Mountain View 2021a).

The City's recycled water system, originally established in 1980 and expanded in 2009, serves 58 active connections as of 2021, including parks, business campuses, and public facilities. Recycled water is sourced from the Palo Alto Regional Water Quality Control Plant and meets tertiary treatment standards. Mountain View continues to explore the possible expansion of its recycled water system, as demonstrated by the recent completion of its Recycled Water Feasibility Study (City of Mountain View 2021a).

Water Supply Sources

The City of Mountain View's water supply sources are summarized in Table 4.15-1, below. Mountain View collaborates closely with its wholesale suppliers, San Francisco Public Utilities Commission (SFPUC) and Valley Water (formerly Santa Clara Valley Water District), to support long-term reliability. SFPUC is implementing its Water System Improvement Program and exploring alternative water supply projects to address potential shortfalls associated with the Bay-Delta Plan, a regulatory framework established by the State Water Resources Control Board (SWRCB) to manage water quality and flow in the Bay-Delta Watershed (SFPUC 2021). Valley Water continues to manage groundwater recharge and is investing in potable reuse and other supply augmentation strategies, while the City's own groundwater wells support operational flexibility, and are expected to play a larger role during dry years (City of Mountain View 2021a).

As of 2025, 89 percent of Mountain View's drinking water supply came from the SFPUC Regional Water System (City of Mountain View 2025g). The City of Mountain View is a member of the Bay Area Water Supply and Conservation Agency (BAWSCA), which includes 26 agencies that purchase

water wholesale from the SFPUC (BAWSCA N.d.). The SFPUC sources most of its water from the Tuolumne River via the Hetch Hetchy Reservoir in Yosemite National Park (City of Mountain View 2021a). An additional nine percent was supplied by Valley Water, which manages local and imported surface water, groundwater, and recycled water throughout Santa Clara County. Valley Water gets most of its water from the State Water Project and Central Valley Project in addition to local surface water and groundwater. These supplies are used to recharge local groundwater basins and are released into creeks as well as delivered to retail water suppliers (City of Mountain View 2021a). The remaining two percent of Mountain View's supply came from local groundwater wells maintained by the City that tap into the Santa Clara Valley groundwater Subbasin, which is managed by Valley Water (City of Mountain View 2025a).

Recycled water, sourced from the Palo Alto Regional Water Quality Control Plant, is used for irrigation and toilet flushing in the North Bayshore Area. Recycled water accounted for 4 percent of the City's total water supply in 2020, and future expansion is being evaluated through an updated Recycled Water Feasibility Study (City of Mountain View 2021a).

Table 4.15-1 City of Mountain View Water Supply Sources

Supply Source	Overview
SFPUC Regional Water System	The SFPUC Regional Water System supplies approximately 89 percent of Mountain View's potable water, delivered via two SFPUC turnouts.
Valley Water Treated Water	Valley Water supplies approximately 9 percent of potable water in Mountain View, primarily serving southern Mountain View. Treated supplies from Valley Water are delivered via one turnout.
Local Groundwater	Four active wells in the City draw from the Santa Clara Subbasin to supplement imported water and enhance drought resilience.
Recycled Water	Recycled water in the City, used for irrigation and toilet flushing, is sourced from the Palo Alto Regional Water Quality Control Plant.

Source: City of Mountain View 2025g

As described above, the City of Mountain View's primary water suppliers are SFPUC and Valley Water. Approximately 85 percent of SFPUC's water supply comes from the Tuolumne River. Water from the Tuolumne River is collected in the Hetch Hetchy Reservoir in Yosemite National Park and conveyed by gravity to the Bay Area through a 167-mile-long aqueduct system. The remaining 15 percent of the SFPUC water supply is collected from local surface reservoirs including Calaveras, San Antonio, Crystal Springs, Pilarcitos, and San Andreas. In addition, although not directly managed by SFPUC, the Los Vaqueros Reservoir supports regional reliability and may store water used by SFPUC during dry years (SFPUC 2021).

Valley Water's water supply is comprised of several sources, including the State Water Project (SWP), Central Valley Project (CVP), local surface water, recycled water, natural groundwater recharge, a semitropic groundwater bank, local reservoirs, and groundwater storage. The SWP is a multi-purpose water storage and delivery system, consisting of canals, pipelines, reservoirs, and hydroelectric power facilities maintained by the Department of Water Resources (California Department of Water Resources 2025). The SWP is contracted to import 100,000 acre-feet per year (AFY) from the Sacramento-San Joaquin Delta (Delta) to Valley Water, delivered via the South Bay Aqueduct. Actual allocations are based on availability of water supplies after complying with applicable regulations to protect the environment and water quality.

The CVP is a federal program overseen by the United States Bureau of Reclamation that includes a complex network of dams, reservoirs, canals, hydroelectric powerplants, and other infrastructure intended to reduce flood risk for the Central Valley and supply water to the Central Valley, and Greater Sacramento and San Francisco Bay Area (United States Bureau of Reclamation 2024). The CVP is contracted to import 152,500 AFY from the Delta to Valley Water via the San Felipe Division facilities of the CVP. Similar to the SWP, contributions from the CVP are also subject to allocation variability due to hydrologic and regulatory constraints (Valley Water 2021).

In addition to the water supplied by the SWP and CVP, Valley Water manages 10 reservoirs across Santa Clara County with a combined storage capacity of approximately 166,000 AF. These reservoirs capture local watershed runoff, which is gradually released throughout the year to support groundwater recharge. In addition, water from Anderson, Coyote, Almaden, and Calero Reservoirs can be directed to Valley Water's treatment plants for potable use. Currently, Anderson Reservoir is offline due to a seismic retrofit project, with completion anticipated by 2030. Valley Water has rights to capture and use 223,000 AFY of the water captured at these reservoirs and diversion structures. On average, 53,000 AFY are currently used for Valley Water's supplies, though this is expected to increase to an average of 83,000 AFY by 2040 (Valley Water 2021).

The prevalence of recycled water in Valley Water's supply is also expanding, the use of which is expected to grow from approximately 17,000 acre-feet per year (AFY) in 2025 to about 28,000 AFY by 2045. Currently, recycled water is generated by the County's four wastewater treatment plants and used for a variety of non-potable applications, with Valley Water supplying advanced treated purified water to South Bay Water Recycling to enhance the quality of the non-potable supply. In addition, approximately 61,000 AF of precipitation and natural runoff are directly recharged into the local groundwater basins each year, though this varies depending on hydrologic conditions. This natural recharge differs from Valley Water's managed recharge program, which involves capturing rainfall in reservoirs and intentionally releasing it into recharge ponds and managed creek systems to replenish groundwater supplies. Valley Water has also invested in 350,000 AF of water storage capacity outside of Santa Clara County. Water is stored in this groundwater bank during periods of surplus and can be withdrawn when local supplies are constrained. Depending on the SWP allocation, Valley Water's contract permits annual withdrawals ranging from approximately 31,000 to 78,000 AF, with higher withdrawals allowed in years with greater SWP allocations. Lastly, as the designated Groundwater Sustainability Agency for Santa Clara County, Valley Water oversees the Santa Clara and Llagas subbasins, aiming to maintain sufficient groundwater storage during wet and average years to ensure reliable water supplies during droughts or shortages. The estimated operational storage capacity of these subbasins is up to 548,000 AF (Valley Water 2021).

Demand Management and Water Conservation

Mountain View's Water Conservation Program, developed in collaboration with Valley Water and the Bay Area Water Supply and Conservation Agency, encompasses a wide range of water use efficiency initiatives aimed at conserving water and enhancing drought resilience. These efforts include rebate programs for high-efficiency appliances and fixtures, smart irrigation controllers, and lawn-to-garden conversions. The City also supports educational initiatives such as landscape classes, school outreach, and public events to promote conservation awareness.

The Water Conservation program includes ordinances to prevent water waste, metering of all potable water connections, conservation-oriented pricing, and advanced metering infrastructure initiatives. Demand Management Measures implemented by the City include Water-Wise House

Calls, landscape water budget reports, leak detection notifications, and participation in Valley Water's Water-Efficient Technology (WET) rebate program.

Mountain View has achieved a 23 percent reduction in per capita water use compared to its 2020 target by implementing and sustaining these efforts (City of Mountain View 2021a).

b. Wastewater Collection and Treatment

Wastewater Collection

The City of Mountain View provides wastewater collection services to residents and businesses within its city limits. The City's sanitary sewer system consists of 159 miles of sewer mains and two pump stations. Mountain View's sanitary sewer system capital costs are funded by ratepayers' sanitary sewer service charges, as well as utility impact fees in North Bayshore and sanitary sewer capacity charges on new development (City of Mountain View 2021a). Historically, such costs have primarily consisted of funding annual replacement of end-of-life sanitary sewer mains and services; however, major infrastructure upgrades are now guided by the City's Capital Improvement Program and long-term capacity assurance planning (City of Mountain View 2025f). In order to manage and operate its wastewater collection system, the City maintains its 2025 Sewer System Management Plan, which provides a framework to plan and schedule maintenance and operation of all parts of the system. As described in the 2025 Sewer System Management Plan, the City uses CCTV and operator visual inspections to regularly inspect an average of 100,000 to 120,000 linear feet of sewer mains and maintains a proactive maintenance schedule to reduce blockages and prevent spills (City of Mountain View 2025f).

Wastewater Treatment

The City's sanitary sewer system conveys wastewater through a network of pipes and pump stations to the Palo Alto Regional Water Quality Control Plant (RWQCP), which is owned and operated by the City of Palo Alto. The RWQCP also treats wastewater from the cities of Palo Alto, East Palo Alto, Los Altos, Los Altos Hills, Stanford University, and Moffett Field. The RWQCP is owned and operated by the City of Palo Alto. After wastewater is conveyed to Palo Alto, the RWQCP provides full tertiary treatment with a capacity of 39 million gallons per day (MGD) under dry weather conditions and produces recycled water for non-potable uses such as irrigation and toilet flushing in the North Bayshore Area (California Regional Water Quality Control Board 2025). Of this permitted capacity, the City of Mountain View has a contracted annual wastewater capacity allotment of 15.1 MGD. As of 2020, the City's wastewater generation was 6.88 MGD. To preserve the quality of recycled water, the City maintains a preventive maintenance program and has implemented sewer rehabilitation and saline rerouting projects to reduce infiltration and inflow (City of Mountain View 2021a).

c. Stormwater

The City of Mountain View maintains a stormwater drainage system which is critical for flood protection during rainstorms, and includes storm drains located along city streets, parking lots, and private properties. This system is managed by the City's Wastewater Section to direct surface stormwater from storm drains to the Bay to prevent flooding (City of Mountain View 2025c).

The City maintains these drainage facilities within the public right of way and on public property, and allocates funds annually for the inspection, replacement, and reparation of stormwater infrastructure (City of Mountain View 2024b). Although the storm drain system generally requires less ongoing capital investment than water and wastewater system, major repairs and upgrades are

required periodically. For example, capital demands may include rehabilitation of aging pump stations, replacement of deteriorating storm culverts, and installation of green stormwater infrastructure and trash capture devices to comply with State regulations. The City maintains a Storm Drain Fund, which collects revenues derived from off-site drainage fees authorized by Mountain View City Code, Section 28.51, to fund storm drainage capital improvements (City of Mountain View 2024a).

The San Francisco Bay Region Municipal Regional Stormwater NPDES Permit (Order No. R2-2015-0049, Permit No. CAS612008), administered by the SWRCB, regulates stormwater discharges in Mountain View and includes provisions for pollutant control, including polychlorinated biphenyls (PCBs) management during demolition activities (City of Mountain View 2025c).

d. Solid Waste

Recology Mountain View is the city's provider of solid waste, recycling, and organics collection services. Recyclables materials collected by Recology Mountain View are transported to the Sunnyvale Materials Recovery and Transfer (SMaRT) Station, which sorts and processes recyclables, while organic materials are sent to Recology's composting facilities for further treatment. Residual solid waste that cannot be recycled is transferred from the SMaRT Station to the Kirby Canyon Landfill in San Jose, which is operated by Waste Management (City of Mountain View 2025d). According to CalRecycle's Solid Waste Information System Database, Kirby Canyon Landfill has a max permitted throughput of 2,600 tons per day, a maximum permitted capacity of 36,400,000 cubic yards, and a remaining capacity of 16,191,600 as of July 31, 2015, as reaffirmed by a 2017 permit issuance and 2024 permit review (CalRecycle 2024). Although the remaining capacity information is outdated, the facility is not expected to cease operations until December 31, 2059 (CalRecycle 2025b). Given that Kirby Canyon Landfill's remaining capacity was last calculated in 2015, solid waste generated in the city may be diverted to other nearby landfills, such as the Newby Island Sanitary Landfill. The Newby Island Sanitary Landfill has a maximum permitted throughput of 4,000 tons per day and a remaining capacity of 16,400,000 cubic yards, and is estimated to remain operational through 2041 (CalRecycle 2025c).

e. Telecommunications, Electricity, and Natural Gas

Telecommunications services in Mountain View are primarily provided by AT&T and Xfinity from Comcast, which provide Internet, phone, and television. Residents in the City also have access to at least eleven residential internet providers, including AT&T, Xfinity, EarthLink, Viasat, HughesNet, Verizon and more (Broadband Now 2025).

Pacific Gas & Electric (PG&E) and Silicon Valley Clean Energy (SVCE) are the main electricity providers to the City of Mountain View, while PG&E is the sole provider of natural gas service in the city. SVCE is a Community Choice Aggregator (CCA) governed by thirteen communities in Santa Clara County, including Mountain View. It purchases electricity from renewable and carbon free sources that is delivered through PG&E's existing infrastructure. All residential and commercial customers in Mountain View are automatically enrolled in SCVE's GreenStart program which provides 100 percent carbon free electricity, including at least 50 percent from renewable sources. Customers can also opt into GreenPrime, SCVE's 100 percent renewable energy option for an additional fee, or opt out of SCVE and receive electricity directly from PG&E, which currently provides electricity that is 30 percent renewable (City of Mountain View 2025e).

4.15.2 Regulatory Setting

a. Water, Wastewater, and Stormwater

This regulatory setting discussion is specific to the assessment of water, wastewater, and stormwater facilities and services. Regulations and policies pertaining to water quality and potable drinking water standards are also discussed in Section 4.8, *Hydrology and Water Quality.*

Federal Regulations

Clean Water Act

The Federal Clean Water Act (CWA), enacted by Congress in 1972 and amended several times since, is the primary federal law regulating water quality in the United States and forms the basis for several State and local laws throughout the country. The CWA established the basic structure for regulating discharges of pollutants into the waters of the United States. The CWA gave the U.S. Environmental Protection Agency (EPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the CWA is administered by the EPA and USACE. At the State and regional levels in California, the CWA is administered and enforced by the SWRCB and the nine Regional Water Quality Control Boards (RWQCBs).

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) regulates public water systems that supply drinking water (42 USC Section 300(f) et seq.; 40 CFR Section 141 et seq). The primary objective of the federal SDWA is to ensure that water from the tap is potable (safe and satisfactory for drinking, cooking, and hygiene). The main components of the federal SDWA are to:

- Ensure that water from the tap is potable
- Prevent contamination of groundwater aquifers that are the main source of drinking water for a community
- Regulate the discharge of wastes into underground injection wells pursuant to the Underground Injection Control program (see 40 CFR Section 144)
- Regulate distribution systems

State Regulations

California Plumbing Code

The California Plumbing Code is codified in Title 24, California Code of Regulations, Part 5. The Plumbing Code contains regulations including, but not limited to, plumbing materials, fixtures, water heaters, water supply and distribution, ventilation, and drainage. More specifically, Part 5, Chapter 4, contains provisions requiring the installation of low flow fixtures and toilets. Existing development will also be required to reduce its wastewater generation by retrofitting existing structures with water efficient fixtures (SB 407 [2009] Civil Code Sections 1101.1 et seq.).

Water Conservation Act of 2009 (Senate Bill X7-7)

California adopted SB X7-7, or the Water Conservation Act of 2009, in November 2009. The legislation requires urban water retailers to set urban water use targets to achieve a 20 percent reduction in per capita urban water use by December 31, 2020. Additionally, the law requires agricultural water suppliers to prepare, adopt, and regularly update agricultural water management plans. Agricultural and urban water providers are ineligible for certain State grants and loans if they do not adhere to water conservation requirements outlined in the law.

Senate Bill 610

Senate Bill 610 (SB 610) amended the California Water Code to require detailed analysis of water supply availability for certain types of development projects. The primary purpose of SB 610 is to improve the linkage between water and land use planning by encouraging greater communication between water providers and local planning agencies and ensuring that land use decisions for certain large development projects are fully informed as to whether sufficient water supplies are available to meet project demands. SB 610 requires a Water Supply Assessment (WSA) for any project that is subject to CEQA, meets the definition of "project" as outlined in SB 610, and would use groundwater to meet some or all water demands during project construction and/or operation.

Thresholds requiring the preparation of a WSA include residential developments of more than 500 dwelling units; shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space; commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space; industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area; and projects that would introduce water demands comparable to the water demands of a 500-unit residential development.

For the purposes of environmental review under CEQA, an analysis of water supply sufficiency is included below in Section 4.15.3, *Impact Analysis*. In addition, project-specific WSAs will be required for future development proposals facilitated by the project that meet the thresholds outlined by SB 610.

California Safe Drinking Water Act

The California SDWA (Health & Safety Code Section 116270 et seq.; 22 Cal. Code Regs. Section 64400 et seq.) regulates drinking water more rigorously than the federal law. Like the federal SDWA, California requires that primary and secondary maximum contaminant levels (MCLs) be established for pollutants in drinking water; however, some California MCLs are more protective of health. The act also requires the SWRCB to issue domestic water supply permits to public water systems.

The SWRCB enforces the federal and State SDWAs and regulates more than 7,500 public water systems. (Implementation of the federal SDWA is delegated to California.) The SWRCB's Division of Drinking Water oversees the State's comprehensive Drinking Water Program. The Drinking Water Program is authorized to issue public water system permits.

Sustainable Groundwater Management Act

In September 2014, California Governor Jerry Brown signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act (SGMA) gives local agencies the power to sustainably manage

groundwater and requires that all medium- and high-priority groundwater basins, as designated by the Department of Water Resources (DWR), are managed under a Groundwater Sustainability Plan (GSP) or GSPs to create and maintain sustainable conditions in the respective basins. GSPs are developed and implemented by Groundwater Sustainability Agencies (GSAs). There may be multiple GSAs per basin, as long as the entirety of each applicable basin is managed in accordance with a GSP that addresses all SGMA requirements to the approval of DWR. The proposed project would occur within the city of Mountain View, which receives its water supply from the San Francisco Public Utilities Commission (SFPUC), Santa Clara Valley Water District, and local groundwater wells.

Urban Water Management Planning Act

The Urban Water Management Planning Act of 1983 amended the California Water Code to require all urban water suppliers in California to prepare and adopt an Urban Water Management Plan (UWMP) and update it every five years. Each UWMP is required to project water supply availability for all existing and anticipated water demands within the suppliers' service area over a 20-year planning horizon and with consideration to varying hydrologic conditions, including normal year, single-dry year, and multiple dry year conditions. The requirements to prepare an update UWMPs applies to all water suppliers with at least 3,000 customer service connections or that deliver at least 3,000 acre-feet per year (AFY) of water.

The Urban Water Management Planning Act also requires each UWMP to include a Water Shortage Contingency Plan (WSCP), which defines levels or stages of water supply shortage condition and outlines specific actions that will be taken to manage available water supply during shortage conditions. Response actions in the WSCP typically aim to reduce water demands through conservation and incentives, with mandates or moratoriums on new connections reserved for extreme shortage conditions, if applicable.

The proposed project is within the City of Mountain View, which is a member of the Bay Area Water Supply and Conservation Agency (BAWSCA), which purchases water wholesale from the San Francisco Regional Water System operated by the San Francisco Public Utilities Commission (SFPUC). The proposed project would receive water supply service from SFPUC, Valley Water, and from City-owned groundwater wells. Given the project's urban location that receives water supply from multiple sources, Mountain View's 2020 UWMP is applicable to the project area and is discussed further in Section 4.15.3 under Impact UTIL-2. This EIR acknowledges that the City's 2025 UWMP is scheduled for adoption in Summer 2026 and will apply to the project area once adopted. However, because the 2025 UWMP has not yet been adopted and its contents are not publicly available, this EIR appropriately relies on the 2020 UWMP for its informational baseline and analytical framework.

State and Regional Wastewater Standards

Standards for wastewater treatment plant effluent are established using State and federal water quality regulations. After treatment, wastewater effluent is either disposed of or reused as recycled water. The RWQCBs set the specific requirements for community and individual wastewater treatment and disposal and reuse facilities through the issuance of Waste Discharge Requirements, required for wastewater treatment facilities under the California Water Code Section 13260 (San Francisco Bay RWQCB 2022.

The California Code of Regulations Title 22, Division 4, Chapter 3, Sections 60301 through 60355 are used to regulate recycled wastewater and are administered by the RWQCBs. Title 22 contains effluent requirements for four levels of wastewater treatment, from un-disinfected secondary recycled water to disinfected tertiary recycled water. Higher levels of treatment have higher effluent standards, allowing for a greater number of uses under Title 22, including irrigation of

freeway landscaping, pasture for milk animals, parks and playgrounds, and vineyards and orchards for disinfected tertiary recycled water.

Local Regulations

City of Mountain View Water Conservation in Landscaping Regulations

In 2010, the City of Mountain View adopted the Water Conservation in Landscaping Regulations to improve irrigation efficiency and reduce water waste in landscaped areas. These standards, which apply to new and rehabilitated landscapes of 500 square feet or more, were updated in 2016 to reflect current best practices.

City of Mountain View 2030 General Plan

The Infrastructure and Conservation Element of the General Plan includes the following goals and policies applicable to water and wastewater resources:

Goal INC-2: Infrastructure systems planned and designed to function during interruptions, emergencies or disasters.

> **Policy INC 2.4 Emergency preparedness and critical infrastructure**. Ensure emergency preparedness for all critical infrastructure including potable water, wastewater, stormwater, recycled water, telecommunications, energy and streets.

Goal INC-4: A sustainable water supply with sufficient supply and appropriate demand management.

> **Policy INC 4.1 Water supply**. Maintain a reliable water supply.

Goal INC-5: Effective and comprehensive programs utilizing water use efficiency, water conservation and alternative water supplies to reduce per capita potable water use.

> **Policy INC 5.2 Citywide water conservation**. Reduce water waste and implement water conservation and efficiency measures throughout the city.

Goal INC-6: A coordinated wastewater collection system that protects the community's health and safety.

> **Policy INC 6.1 Citywide wastewater.** Ensure high-quality wastewater collection services and a well-maintained wastewater system.
>
> **Policy INC 6.2 Pollution source control**. Implement an effective and comprehensive industrial pretreatment program and industrial, commercial and residential pollution source control programs

Goal INC-8: An effective and innovative stormwater drainage system that protects properties from flooding and minimizes adverse environmental impacts from stormwater runoff.

> **Policy INC 8.2 National Pollutant Discharge Elimination System Permit (NPDES).** Comply with requirements in the Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit (MRP).

Policy 8.4 Runoff pollution prevention. Reduce the amount of stormwater runoff and stormwater pollution entering creeks, water channels and the San Francisco Bay through participation in the Santa Clara Valley Urban Runoff Pollution Prevention Program.

Policy 8.5 Site-specific stormwater treatment. Require post-construction stormwater treatment controls consistent with MRP requirements for both new development and redevelopment projects.

Policy 8.7 Stormwater quality. Improve the water quality of stormwater and reduce flow quantities.

City of Mountain View Municipal Code

MVMC Chapter 35 regulates the City's water supply, connections, conservation, and service charges, while Chapter 32 governs wastewater, including collection, treatment, discharge standards, and industrial pretreatment requirements. In addition, the Stormwater Management and Discharge Control Ordinance implements the requirements of the MRP under the NPDES.

City of Mountain View Urban Water Management Plan

The City's Urban Water Management Plan (UWMP) provides an analysis of Mountain View's available water supply during normal and dry-year scenarios, compared to current and projected water demand. Mountain View adopted its 2020 UWMP and associated Water Shortage Contingency Plan (WSCP) in June 2021 (City of Mountain View 2021a).

The City's 2020 UWMP determined that projected water demand under normal and dry-year conditions would be addressed through existing water supplies and demand-reduction measures established by the WSCP. Supplies from Valley Water, local groundwater, and recycled water are anticipated to remain fully available during all conditions through the UWMP's planning horizon of 2045. Information provided by the SFPUC under the Bay Delta Plan scenario indicates that Mountain View will have full SFPUC supply availability in normal years but will experience shortfalls ranging from 36 percent to 54 percent during dry years. Although current and future water needs are expected to be met during normal years, potable water supply shortfalls of approximately 20 percent are projected during dry years. However, these shortfalls would be mitigated through implementation of demand reduction strategies as established by the WSCP.

The WSCP provides a framework of planned response measures to address water supply shortages. The WSCP includes demand-reduction strategies for various shortage stages, including up to 10 percent, 11 to 25 percent, 26 to 40 percent, and greater than 40 percent shortages. Each stage includes progressively stringent actions as shortage conditions escalate, and all stages are designed to ensure adequate water supply for public health and safety as well as to maintain fire protection capabilities.

The City is in the process of preparing the 2025 UWMP, which will incorporate analysis of the R3 Zoning District Update buildout. The 2025 UWMP is projected to be adopted before July 1, 2026.

City of Mountain View Water System Master Plan

The City of Mountain View adopted a Water System Master Plan in 2010 that includes recommendations for hydraulic improvements to maintain adequate service for existing and future development, based on design criteria, growth assumptions, and hydraulic monitoring data. In 2022, the City completed the Water Master Plan (WMP), which replaced the 2010 Water System Master

Plan and provided an updated assessment of water supply, storage, distribution system needs, and long-term capital investments. The updated plan includes a recalibrated hydraulic model using 2020 field data, revised existing and 2030 demand projections, and system evaluations under different scenarios, including peak hour, maximum day, and emergency supply outage conditions. Additionally, the 2022 WMP identifies infrastructure deficiencies, high-pressure areas, pipelines prone to corrosion, and fire-flow limitations. Accordingly, the 2022 WMP establishes a prioritized 20-year Capital Improvement Plan which covers reservoir and pump station rehabilitation, upgrades to pressure-reducing valves and turnouts, pipeline upsizing at system bottlenecks, and an annual main replacement program. Considering the updated system assessment and establishment of a Capital Improvement Plan, the 2022 WMP determines that the City's system can meet projected demands through 2030 with existing supplies and available storage capacity through supply reliability decreases in scenarios where SFPUC or Valley Water sources are unavailable (City of Mountain View 2022).

City of Mountain View Sewer System Management Plan

The Sewer System Management Plan (SSMP), adopted in 2025, establishes policies and procedures for the planning, management, operation, and maintenance of the City's sanitary sewer system. The SSMP is designed to comply with the SWRCB General Waste Discharge Requirements for Wastewater Collection Agencies (Order No. 2022-0103-DWQ) and to provide a comprehensive framework to properly maintain the sewer system, minimize sanitary sewer overflows, and ensure regulatory compliance. It includes elements such as legal authority, operation and maintenance programs, spill emergency response procedures, capacity assurance, and capital improvement planning (City of Mountain View 2025f).

Mountain View Standard Conditions for Approval

As part of discretionary review, the City has standard conditions for different types of approvals (updated as of October 25, 2021). The City has standard conditions relating to utilities and services systems, as summarized below. These include, but are not limited to:

LANDSCAPE DESIGN

Landscape design shall minimize runoff and promote surface filtration. Examples include: (a) no steep slopes exceeding 10%; (b) using mulches in planter areas without ground cover to avoid sedimentation runoff; (c) installing plants with low water requirements; and (d) installing appropriate plants for the location in accordance with appropriate climate zones. Identify which practices will be used in the building plan submittal.

EFFICIENT IRRIGATION

Common areas shall employ efficient irrigation to avoid excess irrigation runoff. Examples include: (a) setting irrigation timers to avoid runoff by splitting irrigations into several short cycles; (b) employing multi-programmable irrigation controllers; (c) employing rain shutoff devices to prevent irrigation after significant precipitation; (d) use of drip irrigation for all planter areas which have a shrub density that will cause excessive spray interference of an overhead system; and (e) use of flow reducers to mitigate broken heads next to sidewalks.

STORMWATER TREATMENT (C.3)

This project will create or replace more than ten thousand (10,000) square feet of impervious surface; therefore, stormwater runoff shall be directed to approved permanent treatment controls as described in the City's guidance document entitled, "Stormwater Quality Guidelines for Development Projects." The City's guidelines also describe the requirement to select Low-Impact Development (LID) types of stormwater treatment controls; the types of projects that are exempt from this requirement; and the Infeasibility and Special Projects exemptions from the LID requirement.

The "Stormwater Quality Guidelines for Development Projects" document requires applicants to submit a Stormwater Management Plan, including information such as the type, location, and sizing calculations of the treatment controls that will be installed. Include three stamped and signed copies of the Final Stormwater Management Plan with the building plan submittal. The Stormwater Management Plan must include a stamped and signed certification by a qualified Engineer, stating that the Stormwater Management Plan complies with the City's guidelines and the State NPDES Permit. Stormwater treatment controls required under this condition may be required to enter into a formal recorded Maintenance Agreement with the City.

HYDROMODIFICATION MANAGEMENT

Postconstruction stormwater runoff shall drain to approved permanent Hydromodification Management (HM) controls to mitigate increases in peak runoff flow and increased runoff volume. Projects that will decrease impervious surface area in comparison to the pre-project condition are not subject to the HM requirement. Information related to this requirement, including the exemption criteria, is included in the City's document entitled, "Hydromodification Management Plan Guidelines for Development Projects," and the Santa Clara Valley Urban Runoff Pollution Prevention Program's manual entitled, "C.3 Stormwater Handbook: Guidance for Implementing Stormwater Requirements for New and Redevelopment Projects."

The City's "Hydromodification Management Plan Guidelines for Development Projects" manual requires applicants to submit a Stormwater Management Plan, including information such as the type, location, and sizing requirements of the controls that will be installed. Include the Stormwater Management Plan with the building plan submittal. Property owners of projects that include stormwater controls constructed in accordance with this condition are required to enter into a formal recorded self-inspection and maintenance agreement with the City.

STORMWATER MANAGEMENT PLAN – THIRD-PARTY ENGINEER'S CERTIFICATION

The Final Stormwater Management Plan must be certified by a qualified third-party engineer that the proposed stormwater treatment controls comply with the City's Guidelines and Provision C.3 of the Municipal Regional Stormwater NPDES Permit (MRP).

WATER AND SEWER CAPACITY CHARGES

Prior to issuance of any building permits and prior to approval of the parcel or final map, the applicant shall pay the water and sewer capacity fees for the development. The water and sewer capacity charges for residential connections are based on the number and type of dwelling units. Separate capacity charges apply for different types of residential categories to reflect the estimated demand of each type of connection. The water and sewer capacity charges for nonresidential

connections are based on the water meter size, building area, and building use, respectively. Credit is given for the existing site use(s) and meter size(s), as applicable.

LANDSCAPING

Detailed landscape plans encompassing on- and off-site plantable areas out to the street curb must be included in building permit drawings. Minimum plant sizes are flats or one-gallon containers for ground cover, five-gallon for shrubs, and 24" box for trees. The drawings must be approved by the Zoning Administrator prior to building permit issuance and implemented prior to occupancy. All plans should be prepared by a licensed Landscape Architect and should comply with the City's Landscape Guidelines, including the Water Conservation in Landscaping Regulations (forms are available online at www.mountainview.gov/planningforms). Additional landscaping materials or modifications may be required by the Planning Division at final inspection to ensure adequate planting coverage and/or screening.

b. Solid Waste

This regulatory setting discussion is specific to the assessment of solid waste services/

Federal Regulations

Title 40 of the Code of Federal Regulations

Title 40 of the CFR, Part 258 (Resource Conservation and Recovery Act, Subtitle D), contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the Federal landfill criteria.

State Regulations

Assembly Bill 1826

In October 2014, Governor Brown signed AB 1826, requiring businesses to recycle 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, including multifamily residential dwellings that consist of five or more units (although multifamily dwellings are not required to have a food waste diversion program). Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. This law phases in the mandatory recycling of commercial organics over time, while also offering an exemption process for rural counties. In particular, the minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

California's Short-Lived Climate Pollutant Reduction Strategy (SB 1383)

Signed into law in September 2016, SB 1383 establishes methane emissions reduction targets for California in a statewide effort to reduce emissions of short-lived climate pollutants. The targets are to reduce organic waste disposal by 50 percent by 2020 and 75 percent by 2025. The law also grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025. Enforcement of these targets began January 1, 2022.

California Integrated Waste Management Act

AB 939 (PRC 41780) requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare source reduction and recycling elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing, and stimulate the purchase of recycled products.

Public Resources Code Chapter 343 (Senate Bill 1016)

SB 1016 of 2007 (PRC Chapter 343, Statutes of 2007) requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. After an initial determination of diversion requirements in 2006 and establishing diversion rates for subsequent calendar years, the CalRecycle Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. Since January 1, 2018, the Board is required to review a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

CALGreen Building Code

In 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11, Title 24, known as "CALGreen") was adopted as part of the California Building Standards Code. Section 4.408, Construction Waste Reduction Disposal and Recycling, mandates that in the absence of a more stringent local ordinance, a minimum of 50 percent of non-hazardous construction and demolition debris must be recycled or salvaged. The Code requires the applicant to have a construction and waste demolition and diversion plan, for on-site sorting or construction debris, which is submitted to the City of Mountain View for approval.

Regional and Local Regulations

City of Mountain View Construction and Demolition Debris Ordinance

The City of Mountain View's Green Building Code (Chapter 8, Division III) requires that at least 65 percent of construction, renovation, and demolition debris be diverted from landfills through recycling or salvage. This requirement supersedes the City's previous Construction and Demolition Debris Ordinance.

City of Mountain View Zero Waste Resolution and Zero Waste Strategic Plan

In 2018, the City Council adopted a Zero Waste Policy, followed by the approval of a Zero Waste Plan in 2020. The Plan sets a target to divert 90 percent of waste from landfills by 2030 and aims to lower per capita waste disposal from both residential and commercial sources.

City of Mountain View 2030 General Plan

The Infrastructure and Conservation Element of the General Plan includes the following goals and policies applicable to water and wastewater resources:

Goal INC-10: Reduced waste through supply-chain management, advocacy and outreach to reduce waste.

Policy INC 10.1 Zero waste. Pursue a citywide goal of zero waste.

Policy INC 10.4 Construction waste reuse. Encourage building deconstruction and reuse and construction waste recycling.

Goal INC-11: Services and programs that continue to reduce waste and promote environmental responsibility.

Policy INC 11.1 Waste diversion and reduction. Meet or exceed all federal, state and local laws and regulations concerning solid waste diversion and implementation of recycling and source reduction programs.

Policy INC 11.4 Solid waste. Ensure all municipal solid waste generated within the city is collected, transported and disposed of in a manner that protects public health and safety.

Mountain View Municipal Code

Chapter 30 of MVMC includes requirements for waste diversion, recycling, and construction and demolition debris management and reuse.

Mountain View Standard Conditions for Approval

As part of discretionary review, the City has standard conditions for different types of approvals (updated as of October 25, 2021). The City has standard conditions relating to utilities and services systems, as summarized below. These include, but are not limited to:

MOUNTAIN VIEW GREEN BUILDING CODE/CONSTRUCTION AND DEMOLITION ORDINANCE

If this project is subject to the requirements of the Mountain View Green Building Code, a Construction and Demolition Waste Management Plan shall be submitted with the building permit application and approved by the Public Works Solid Waste and Recycling Division prior to issuance of a building permit. A Final Construction and Demolition Waste Management Plan shall be submitted and approved prior to final inspection.

c. Telecommunications, Electricity, and Natural Gas

Federal Regulations

Construction Equipment Fuel Efficiency Standard

The U.S. EPA sets emission standards for construction equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements contained in Title 40 of the Code of Federal Regulations (CFR) Parts 1039, 1065, and 1068. Emissions requirements for new off-road Tier 4 vehicles were completely phased in by the end of 2015.

State Regulations

Title 24, California Code of Regulations (CCR)

CCR, Title 24, Part 6, is California's Energy Efficiency Standards for Residential and Non-Residential Buildings. The CEC established Title 24 in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and nonresidential buildings. The standards are updated on an approximately three-year cycle to allow consideration and possible incorporation of new efficient technologies and methods. In 2022, the CEC updated Title 24 standards with more stringent requirements effective January 1, 2023. All buildings for which an application for a building permit is submitted on or after January 1, 2023 must follow the 2022 standards. The next update is expected in 2025 and will become effective January 1, 2026. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided that these standards exceed those provided in Title 24.

Part 6 of Title 24 contains the 2016 Building Energy Efficiency Standards for new residential and CCR Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC). The most current standards are the 2022 Title 24 standards. The 2022 Standards focus on four key areas: 1) encourage electric heat pump technology and use; 2) establish electric-ready requirements when natural gas is installed; 3) expand solar photovoltaic (PV) system and battery storage standards; 4) and strengthen ventilation standards to improve air quality (CEC 2021).

California Green Building Standards Code (2019), CCR Title 24, Part 11

California's green building code, referred to as CALGreen, was developed to provide a consistent approach to green building within the State. CALGreen lays out the minimum requirements for newly constructed residential and nonresidential buildings to reduce GHG emissions through improved efficiency and process improvements. The requirements pertain to energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and reductions to internal air contaminants. It also includes voluntary tiers to further encourage building practices that improve public health, safety, and general welfare by promoting a more sustainable design.

Local Regulations

Mountain View Green Building and Reach Codes

The City Council adopted the Mountain View Green Building Code (MVGBC) amendments, including Reach Code efforts, in November 2019. On September 9, 2025, the City adopted Ordinance No. 9.2025, which repealed Mountain View's local amendments to the 2022 California Building Standards Code and adopted local amendments to the 2025 California Building Standards Code

(including the 2025 Energy Code and CALGreen). Effective January 1, 2026, all building permits in the City are subject to MVGBC requirements as specified in Chapter 8, Article XII of the Mountain View City Code. Pursuant to MVGBC Section 8.64.25, new multifamily residential construction must comply with the following:

a. Meet the mandatory measures of the adopted California Green Building Standards Code (Title 24, Part 11), inclusive of local amendments in Mountain View City Code Article XIII;
b. Meet the intent of LEED ® Gold certification or the minimum requirements of the applicable zoning, whichever is more stringent;
c. Meet the adopted California Energy Code (Title 24, Part 6);
d. Install individual unit and central heat pump water heater systems per California Energy Code Sec. 170.2(d);
e. Install the maximum of photovoltaic (PV) per California Energy Code Sec. 170.2(f) or 170.2(g), depending on building stories;
f. Install a battery energy storage system (BESS) per California Energy Code Sec. 170.2(h), if more than three stories; and
g. Fulfill electric readiness improvement requirements for any gas or propane appliance installed pursuant to Sec. 8.74.05.

Pursuant to Sec. 8.72.20, all multifamily residential new construction must comply with the following additional requirements:

a. Install electric vehicle charging spaces (EVCS) Level 2 as a percentage of the total number of parking spaces (assigned, unassigned or common area), of which a min. of 25 percent of the EVCS spaces must be located in the unassigned or common use parking area(s), 40 percent for developments with 20 or fewer units, or 15 percent for developments with 21 or more units;
b. Each parking space serving a dwelling unit must be EV Ready Level 2 (min. 1 per unit);
c. Install (1) EVCS Level 3/DC Fast Charger per 100 spaces, or portion thereof; and
d. All remaining parking spaces shall be EV Ready Level 1.

City of Mountain View 2030 General Plan

The Infrastructure and Conservation Element of the General Plan includes the following goals and policies applicable to water and wastewater resources:

Goal INC-9: A comprehensive network of telecommunication services that meets community needs.

Policy INC 9.1 Citywide telecommunications. Work with telecommunication service providers to ensure high-quality products and services for Mountain View residents and businesses.

Policy INC 9.2 Emerging technologies. Develop guidelines for the deployment of wireless and emerging communications technologies.

Goal INC-13: Increased energy efficiency and conservation throughout the city.

Policy INC-13.1 Energy efficiency and conservation. Increase energy efficiency and conservation in public buildings and infrastructure.

Policy INC-13.5 Smart utility meters. Encourage utility meter technologies that provide feedback about energy usage to customers.

Goal INC-14: Sufficient renewable sources of energy to meet current and future demand.

Policy INC-14.1 Renewable energy. Promote the deployment of renewable energy technologies throughout the city.

Policy INC-14.2 Solar energy. Encourage active and passive solar energy use.

Policy INC-14.3 Regional renewable energy. Participate in regional initiatives to encourage and develop renewable energy sources.

City of Mountain View Municipal Code

Chapter 16 of the MVMC includes regulations for telecommunications facilities in the City. Specifically, Section 16.13.080 outlines rules for eligible telecommunications facility requests, including expedited review timelines and limits on application requirements, while Chapter 5 contains provisions for franchises and rights-of-way use by telecom and electricity providers. Chapter 18 of the MVMC establishes building regulations and adopts the California Building Standards Code with local amendments. Electricity is addressed through Article 6 (Electrical Code), which incorporates the California Electrical Code and establishes requirements for electrical installations, wiring methods, and safety standards in all structures. Local amendments include electric-readiness provisions, requiring pre-wiring for future electrification in remodels or additions where gas or propane appliances are installed, and compliance with energy efficiency measures under the California Energy Code. Natural gas is regulated under Article 11 (Fuel Gas Code), which adopts the California Fuel Gas Code and regulates the design, installation, and inspection of fuel gas piping systems, appliances, and related equipment.

Mountain View Standard Conditions for Approval

As part of discretionary review, the City has standard conditions for different types of approvals (updated as of October 25, 2021). The City has standard conditions relating to utilities and services systems, as summarized below. These include, but are not limited to:

UNDERGROUND SERVICES

All new and existing electric and telecommunication facilities serving the site are to be placed underground. Under certain circumstances, the undergrounding of the new and existing overhead electric and telecommunication lines is to be completed prior to issuance of a Certificate of Occupancy for any new buildings within the site. If allowed by the City, aboveground transformers, power meters, and pedestals shall be located so they are screened in the least visible location from the street or to the general public, as approved by the Community Development and Public Works Departments.

GREEN BUILDING – RESIDENTIAL NEW CONSTRUCTION

The project is required to meet the mandatory measures of the California Green Building Standards Code and meet the intent of the applicable GreenPoint Rated points. All mandatory prerequisite points and minimum point totals per category to attain GreenPoint Rated status must be achieved, unless specific point substitutions or exceptions are approved by the Community Development Department. Formal project registration and certification through Build It Green is not required for

compliance with the Mountain View Green Building Code (MVGBC). The project is also required to comply with Title 24, Part 6.

4.15.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The project's impacts related to utilities and service systems are evaluated based on the project's adherence to local, state, and federal standards, and with consideration to the project's anticipated need for various utility services and facilities, in comparison to the capacity and condition of existing utilities and facilities. Evaluation of the proposed land uses and intensity of use was conducted to characterize utility requirements associated with buildout of the proposed project, including for water supply, wastewater treatment and disposal, stormwater management, natural gas, electricity, and telecommunications, as summarized below.

The Project's affected parcels currently contain approximately 9,000 single family and multi-family dwelling units, plus additional existing land uses. While long-term Project growth results in 16,000 net new units, near-term project growth is only a portion of that amount. The near-term scenario is used to analyze the hydraulic impacts of the Project on the City's potable water system, due to the speculative nature of the specific distribution and development densities of the long-term scenario. The near-term scenario adds approximately 8,000 multi-family units to the existing conditions. These scenarios are summarized in Table 4.15-2.

Table 4.15-2 Summary of Land Use Scenarios

Scenario	Approximate number of units in the area affected by the project
Existing	9,000
No Project	10,000
Near-Term	17,000
Long-Term	25,000

Water Supply

Water demands for all Project scenarios were calculated based upon multi-family residential unit duty factors established in the North Bayshore Precise Plan Phase II Utility Impact Study of 100 gallons per day per dwelling unit.

The estimated demands for the Near-Term Scenario were then added to the City's hydraulic models for both Existing and Future Cumulative Conditions, which were developed as part of the 2022 Water Master Plan. Model evaluations addressed system performance under peak hour and maximum-day demand scenarios to confirm compliance with pressure and fire flow criteria, based on planning-level standards for multi-family residential land use from the 2022 Water Master Plan.

The estimated demands for the Long-Term Scenario were evaluated relative to the available water supply studied in the 2020 Urban Water Management Plan.

Wastewater

The volume of wastewater that would be generated by development facilitated by the project was calculated based upon multi-family residential sewer duty factors from the North Bayshore Plan Phase II Utility Impact Study of 75 gallons per day per dwelling unit.

The estimated wastewater generation for the Near-Term Scenario was incorporated into the City's hydraulic sewer model for Existing and Future Cumulative Conditions, consistent with the 2022 Sewer System Management Plan. Model evaluations considered peak wet weather flow and average dry weather flow scenarios to identify potential surcharging and address compliance with applicable criteria. Capacity constraints were reviewed for major conveyance paths.

The estimated wastewater generation for the Long-Term Scenario was compared against contractual capacity rights under the City's agreements with Palo Alto and Los Altos.

Stormwater

Stormwater management needs of the project were evaluated by considering whether development facilitated by the project would introduce new impervious surfaces in areas where stormwater management is not currently present, such that the existing city-wide stormwater management system would need to be extended to serve project sites.

Natural Gas, Electricity, and Telecommunications

Development facilitated by the project would connect to existing facilities providing natural gas, electricity, and telecommunications services throughout the project area. Potential need for new or upgraded utility connections was considered based on existing site-specific conditions and regulatory requirements for reliable service connections.

Solid Waste

Development facilitated by the project would utilize existing solid waste infrastructure in the region. Potential need for new or upgraded solid waste facilities was considered based on remaining capacity for existing facilities and regulatory requirements for solid waste disposal. The solid waste analysis evaluates whether operation of development facilitated by the proposed project would exceed applicable State or local solid waste standards or the permitted capacity of existing regional disposal facilities. The analysis evaluates (1) daily disposal rates relative to permitted throughput, (2) remaining permitted capacity at regional landfills over their approved operating lives, and (3) the regional solid waste management framework, which relies on a network of permitted Class III landfills rather than a single facility.

Significance Thresholds

To determine whether a project would result in a significant impact to Utilities and Service Systems, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

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

3. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the projects' projected demand in addition to the provider's existing commitments;
4. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or,
5. Conflict with federal, state, and local management and reduction statutes and regulations related to solid waste.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
Threshold 3:	Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact UTIL-1 **DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD INCREASE DEMAND FOR UTILITY INFRASTRUCTURE. HOWEVER, THIS WOULD REPRESENT MINOR, IN-CORRIDOR UTILITY CONNECTIONS AND ROUTINE UPGRADES, AND WOULD NOT REQUIRE SUBSTANTIAL NEW OR EXPANDED FACILITIES, CONSISTENT WITH PLANNED CAPITAL IMPROVEMENTS. THEREFORE, WITH COMPLIANCE WITH EXISTING REGULATIONS AND IMPLEMENTATION OF PLANNED CAPITAL IMPROVEMENTS, THE EXISTING UTILITY SYSTEMS FOR WATER, STORMWATER, ELECTRIC POWER, NATURAL GAS, AND TELECOMMUNICATION FACILITIES IN MOUNTAIN VIEW WOULD HAVE SUFFICIENT CAPACITY TO SERVE THE PROJECT, AND THE WASTEWATER TREATMENT PROVIDER WOULD HAVE SUFFICIENT CAPACITY TO ACCOMMODATE PROJECT-RELATED DEMAND. IMPACTS ASSOCIATED WITH RELOCATION OR CONSTRUCTION OF NEW UTILITY INFRASTRUCTURE WOULD BE LESS THAN SIGNIFICANT.**

The R3 Zoning District Update would accommodate additional residential development in Mountain View and an associated increase in demand for water, wastewater treatment, stormwater drainage, electricity, natural gas, and telecommunications facilities. Responsibility for constructing water, sewer, and stormwater drainage improvements on new or redeveloped housing sites is placed on residential developers. When offsite impacts occur, such as increased stormwater runoff, higher sewer loads, or additional traffic congestion at nearby intersections, additional expenditures by the developer may be required to mitigate those effects. These improvements may include connections to existing utility systems, rough grading, and installations of water and sewer lines. Extensions of this infrastructure would typically occur within adjacent existing roadways and, aside from temporary construction-related disturbance would not result in environmental impacts beyond those identified elsewhere throughout this EIR. Construction of accessory dwelling units under implementation of the R3 Zoning District Update would require minor tie-ins to existing on-site utility systems serving the primary dwelling unit, and as such, construction would not result in significant environmental impacts due to the limited scale of ground disturbance.

Water

This analysis addresses the availability and capacity of existing water supply facilities, including conveyance and distribution pipelines and site-specific service connections for water supply and fire protection water availability, and characterizes potential impacts associated with expanding existing

facilities or building new facilities if needed to serve future developments. Water supply availability is addressed separately, under Impact UTIL-2.

Construction activities associated with development under the proposed project would include the use of recycled water for dust suppression, concrete manufacturing, and washing equipment. Construction water would either be trucked to active construction sites or produced from nearby fire hydrants or existing water connections, when available. Construction activities would not require new or expanded water supply connections or conveyance facilities.

During operation of potential future developments, water distribution pipelines and site-specific connections would be required to have sufficient capacity to deliver water in quantities meeting the demands of high-density residential uses facilitated by the proposed project. As discussed under Impact UTIL-2, below, development facilitated by the proposed project would increase water demand compared to existing site uses. Therefore, this analysis considers whether the City of Mountain View's existing water supply system is sized with sufficient capacity to serve the increased residential density that would be facilitated by the proposed project.

A Utility Impact Study Memorandum for the project was prepared by Schaaf and Wheeler in December 2025 (Appendix G). The Utility Impact Study concluded that the City's water system is sufficient to maintain minimum pressures under peak hour demand with implementation of the proposed project through 2030, aligned with the conclusions of the City's 2022 WMP (City of Mountain View 2022). The modeling uses 2030 as a mid-term planning point because beyond this horizon, project definitions, implementation timing, and engineering assumptions are all subject to change as agency plans are periodically updated. Accordingly, modeling beyond a mid-term horizon of 2030 would be speculative in nature. The study determined that there are multiple fire flow deficiencies under both the existing and future cumulative conditions in Pressure Zones 1 and 2, but that the project would have no impact to the majority of the available fire flows. To ameliorate deficient fire flows, the study recommends one new project-specific water system capital improvement project in the area of the San Antonio Center, a mixed-use development located at 2550 West El Camino Real, upon redevelopment of existing single-family residence parcels that could be developed into multi-family residential uses along Monroe Drive under the R3 Zoning District Update. The recommended capital improvement project would upsize approximately 1,000 linear feet of pipes at Monroe Drive to 8-inch pipe and approximately 900 linear feet of pipe along Del Medio Court to a 10-inch pipe to alleviate a deficiency and increase available fire flow. Other than the two deficient locations at Pressure Zones 1 and 2, the Utility Impact Study found that the City's water system is sufficient to support existing and future cumulative demands, including required fire flows, at R3 Zoning District Update sites. These findings are consistent with the City's 2022 WMP, which already includes mid-term upgrades such as pressure-reducing valve replacements, targeted main rehabilitation, seismic and reliability improvements, and selective distribution-system upsizing in older neighborhoods. These improvements would occur within previously disturbed street rights-of-way, are routine in nature, and represent standard maintenance and system-reliability efforts rather than substantial capacity or system expansions.

Therefore, the proposed rezone to allow for higher-density residential development would not require substantial new or expanded water supply infrastructure beyond those noted above for the San Antonio Center area. Those upgrades to improve fire flow availability would take place within established and previously disturbed utility corridors and the required relatively routine utilities upgrades would not be anticipated to result in significant environmental impacts. Future developments would connect to the existing municipal water system. New service connections would be installed during site-specific construction and are expected to occur within existing utility

corridors. Impacts related to the relocation or construction of new or expanded water infrastructure would be less than significant.

Wastewater

This analysis focuses on impacts associated with wastewater conveyance infrastructure and the capacity of the Palo Alto Regional Water Quality Control Plant, the wastewater treatment facility serving the City of Mountain View. Consistent with the City's 2022 Sewer Master Plan (SMP) and the Utility Impact Study planning horizons of 2030, this analysis focuses on the mid-term condition in 2030 to demonstrate what may occur during the project's overall horizon of 2050. Because exact project buildout locations and timing are unknown, and because agency plans are regularly updated as new information becomes available, analyzing beyond the mid-term 2030 scenario would be speculative in nature, as project definition, timing, and engineering assumptions are subject to change as plans are refined and updated periodically.

All of the R3 Zoning District Update sites are located within the existing urbanized area of Mountain View and are currently developed. As such, the sites are already served by existing wastewater infrastructure and would likely require minimal conveyance improvements. New service connections would be installed during construction of future development and, consistent with surrounding development, would be placed underground and within existing utility easements. The City of Mountain View maintains a Capital Improvement Program that includes ongoing rehabilitation and replacement of aging sewer infrastructure and monitors system capacity to ensure reliable service (City of Mountain View 2024). Additionally, the City's 2022 SMP identifies prioritized mid-term capital improvement projects necessary to maintain system reliability through the SMP and Utility Impact Study planning horizon of 2030, including localized sewer main upsizing, rehabilitation, and cured-in-place pipe lining. These improvements would occur within previously disturbed rights-of-way and would represent typical maintenance and service reliability efforts, rather than substantial expansion or development of new wastewater conveyance or treatment facilities.

While development on most of the sites would not require additional wastewater infrastructure, development facilitated by the proposed project would generate an additional 1.2 million gallons per day (MGD), or 1,344 AFY, of wastewater, based on a factor of 75 gallons per day per dwelling unit and a maximum buildout of 16,000 dwelling units, as determined by the Utility Impact Study (Appendix G). For purposes of evaluating wastewater treatment capacity under the City's contractual agreements, this estimate is converted to an Average Annual Flow (AAF) of 1.34 MGD, consistent with the City's definition of AAF as 1.05 times average dry weather flow (Appendix G). The wastewater treatment plant has a capacity of 80 MGD, a dry weather flow capacity of 39 MGD and an average daily influent flow of 18.7 MGD (San Francisco Bay RWQCB 2025). However, under the City's Basic Agreement with Palo Alto and Los Altos, Mountain View's contractual allocation is 15.1 MGD of average annual flow. Current average daily influent flow from Mountain View is approximately 6.6 MGD, leaving approximately 8.5 MGD of available treatment capacity. Given that full buildout of the project would result in the generation of an additional 1.34 MGD of wastewater AAF, the additional wastewater demand associated with development facilitated by the proposed project would be approximately 15.8 percent of Mountain View's remaining contractual capacity. At existing conditions, the additional wastewater generated by the proposed project would represent a small fraction, or approximately 3 percent, of the plant's overall remaining capacity and would not require expansion of treatment facilities. Excluding development facilitated by the project, the City is projected to generate 10.62 MGD of wastewater by 2045, at which time Mountain View would

have approximately 4.48 MGD available treatment capacity under the City's contractual obligations (Appendix G). Project-related AAF wastewater generation of 1.34 MGD would represent approximately a 12.6 percent increase from 2045 pre-project wastewater generation projections, and approximately 30 percent of the City's estimated contracted wastewater treatment capacity of 4.48 MGD. However, project-related development and wastewater generation would occur gradually over time, concurrently with cumulative development and periodic updates to the City's wastewater planning and management efforts.

Furthermore, the City's Public Works Department would review individual development projects to ensure adequate capacity in the local collection system. New development would also be required to comply with Chapter 32 of the Mountain View Municipal Code, which governs sewer system design, construction, and connections. Additionally, the California Plumbing Code contains provisions requiring the installation of low flow fixtures and toilets in new developments and the retrofitting of existing structures with water efficient fixtures. Development facilitated by the proposed project would be required to comply with Part 5, Chapter 4 of the California Plumbing Code which would reduce wastewater generation within the city.

Compliance with existing regulations and the City's infrastructure planning practices would ensure that potential impacts associated with the construction or relocation of new or expanded wastewater conveyance infrastructure would be less than significant.

Stormwater

Virtually all of the R3 Zoning District Update sites are primarily developed with impervious surfaces and landscaped areas. Development facilitated by the project would not require the construction of additional stormwater infrastructure because Mountain View is developed and equipped with an existing stormwater drainage system that serves the entirety of the city. Development facilitated by the project would introduce new impervious surfaces through the construction or reconstruction of paved areas. However, given that most of the R3 Zoning District Update sites are developed with impervious surfaces, increase in impervious surfaces would be limited. In addition, future development would be required to be implemented in compliance with existing programs and permits, including Chapter 32 of the Mountain View Municipal Code, and other applicable regulations as discussed in Section 4.8, *Hydrology and Water Quality,* which would reduce water stormwater runoff. Compliance with the existing regulations would increase infiltration of stormwater and decrease stormwater runoff on sites that are currently mostly paved and/or developed.

Specifically, projects that create or replace more than 10,000 square feet of impervious surfaces would be required to implement on-site stormwater treatment controls consistent with the City's Stormwater Guidelines and Provision C.3 of the Municipal Regional Permit, as described in Section 4.15.2, *Regulatory Setting*. Implementation of the Low-Impact Development site design measures required by the City's Stormwater Treatment (C.3) Standard Condition for Approval would ameliorate increases in peak runoff flow and runoff volume. Compliance with the City's Standard Conditions for Approval would require the preparation of Stormwater Management Plans for individual developments facilitated by the proposed project, which must be certified by a qualified third-party engineer to ensure compliance with the City's guidelines and the State NPDES Permit. In addition, postconstruction stormwater runoff would drain to approved permanent Hydromodification Management controls to mitigate increases in peak runoff flow and increased runoff volume, the details of which would be described in the individual project's Stormwater Management Plans, in accordance with the City's Hydromodification Management Standard

Condition for Approval. Stormwater runoff would be treated and retained on-site prior to entering the City's storm drainage system. In addition, applicants are required to pay off-site storm drainage fees under Municipal Code Section 28.51(b) to fund construction of stormwater drainage facilities that serve citywide drainage fees. Construction of on- or off-site stormwater drainage improvements would occur within existing rights-of-way and would be temporary in nature.

Development facilitated by the project would also be required to demonstrate compliance with all applicable federal, state, and local regulations related to stormwater management. Therefore, the proposed project would not significantly contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. Potential impacts associated with the relocation or construction of new or expanded stormwater facilities due to development facilitated by the proposed project would be less than significant.

Telecommunications

Project implementation would require connections to existing adjacent utility infrastructure to meet the needs of residents and tenants of development facilitated by the proposed project. Based on the availability of existing telecommunications infrastructure throughout Mountain View, construction of new telephone and cable lines would not be required, and all sites would be able to connect to existing infrastructure. If necessary, coordination of new service connections would occur with the respective providers at the time of individual site development, and all telecommunication lines serving the site would be required by the City's Standard Condition of Approval to be placed underground, typically in established, previously disturbed utility corridors. Therefore, there would be adequate telecommunications facilities to serve the development facilitated by the project and no new or expanded facilities that could result in significant impacts to the environment would be required. Impacts would be less than significant.

Natural Gas and Electricity

Development facilitated by the project would occur on sites that are generally developed or surrounded by existing development and are served by existing natural gas and electrical infrastructure. Therefore, development would generally have access to utility infrastructure and would not require the installation of substantial natural gas or electrical infrastructure to meet increased demands. If new meter installations or service connections for electricity and natural gas are required, coordination would occur with the respective providers at the time of site development, and all electric lines and transformers would be required to be placed underground in accordance with the City's Standard Conditions of Approval. Any necessary construction activities associated with undergrounding overhead electric lines would be temporary and confined to existing rights-of way. Therefore, potential impacts associated with the relocation or construction of new or expanded natural gas or electrical facilities due to development facilitated by the proposed project would be less than significant.

Mitigation Measures

This impact would be less than significant without mitigation. Mitigation would not be required.

Threshold 2:	Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact UTIL-2 THE PROPOSED PROJECT WOULD FACILITATE GROWTH AND INCREASE WATER DEMAND IN THE CITY OF MOUNTAIN VIEW. SUFFICIENT WATER SUPPLY IS AVAILABLE TO SERVE EXISTING AND ANTICIPATED GROWTH IN MOUNTAIN VIEW, INCLUDING FOR THE PROPOSED PROJECT, DURING NORMAL, SINGLE DRY, AND MULTIPLE DRY YEAR CONDITIONS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The proposed project would facilitate the introduction of up to 16,000 new residential dwelling units within the City of Mountain View and up to approximately 32,000 new residents, based upon the City-calculated occupancy rate of 2.0 residents per unit.

In California, a project that would introduce at least 500 new residential dwelling units or other land uses with water demands comparable to a 500-unit residential development is subject to California Water Code (Sections 10635, 10910-10912, and 10915), as amended by SB 610. When a project meets the development thresholds outlined in SB 610, a WSA is required, and must quantify water supply availability and reliability for the project over a 20-year planning horizon, and with consideration to varying hydrologic year types including normal year, single-dry year, and multiple dry year conditions. The proposed project would facilitate the introduction of new residential units through proposed amendments to the Zoning Code; however, the proposed project does not include plans or proposals for specific development projects. Therefore, the proposed project does not qualify as a "project" under SB 610, and a WSA is not required. Future development proposals that meet the SB 610 thresholds of a "project" will be required to prepare project-specific WSAs.

Although a WSA is not required for the proposed project, this section relies on the Utility Impact Study prepared by Schaaf and Wheeler (Appendix G) to provide a thorough analysis of water supply availability and reliability for potential future buildout under the proposed project, including estimates of potential water demands associated with buildout conditions (see "Water Demand", below), consideration of growth projections used to inform SFPUC and Valley Water estimates of supply availability and reliability and how those projections compare to growth facilitated by the proposed project (see "Growth Projections", below), and analysis of demand and supply projections included in Mountain View's 2020 UWMP (see "Supply Reliability", below). This analysis does not constitute a WSA for the proposed project but may be used to inform future project-specific WSAs as applicable.

Water Demand

The Utility Impact Study prepared by Schaaf and Wheeler calculated the incremental difference, or project contribution, in Average Daily Demand (ADD), which is an estimated average of daily demand for fresh water based on total annual water use. Full buildout of the proposed project would increase potable water demand by approximately 1.6 million GPD on affected parcels compared to existing and cumulative year 2045 conditions, based on generation factors for multi-family residential uses (Appendix G). The City's 2020 UWMP reported that total water use in 2020 was 9,856 AFY, equivalent to approximately 8.8 million GPD, and conservatively estimates that water demand in 2045 for the City ("Scenario B" including adopted plumbing efficiency codes) would be 14,163 AFY, equivalent to approximately 12.64 million GPD (City of Mountain View 2021a). For the purpose of evaluating long-term water supply at the 2045 planning horizon, consistent with the City's UWMP, the Utility Impact Study conservatively applies the project's full estimated potable water demand of approximately 1,600,000 GPD as a net increase to citywide

demand, which includes existing and cumulative demand. Therefore, full buildout of the project could generate demand of approximately 14.24 million GPD, Citywide. This buildout would occur incrementally over time, and is a conservative estimate that does not account for recent updates to the City's Plumbing Code and additional projected savings from conservation efforts.

Growth Projections

All development under the proposed project would occur on the R3 Zoning District Update sites, which are within the SFPUC and Valley Water service areas. In addition to the UWMPs maintained by SFPUC and Valley Water, the City maintains its own UWMP in accordance with the Urban Water Management Planning Act, updating the UWMP every five years to reflect any changes in growth projections, development characteristics, water supply sources, and other factors affecting supply availability and reliability. Each iteration of the UWMP contains updated projections of water supply availability and reliability throughout the City of Mountain View, based upon anticipated growth and associated water needs. The City's 2020 UWMP bases its growth projections on the City of Mountain View General Plan land use strategy, and recently (at the time of UWMP development) certified EIRs and Precise Plans, which include General Plan growth estimates, plus growth affiliated with the North Bayshore, El Camino Real, East Whisman and San Antonio Precise Plan, as well as approved Rezoning and General Plan Amendment Projects. Taking these plans and their respective growth estimates into account, the UWMP projects a total of 116,900 residents by 2045 (City of Mountain View 2021a).

Since the 2020 UWMP, the City has initiated development and implementation of the 2025 UWMP, which is scheduled for adoption by Summer 2026. As an input to that overall effort, Bay Area Water Supply and Conservation Agency (BAWSCA) released its 2025 Regional Water Demand and Conservation Projections Study, which provides member-agencies such as the City of Mountain View with forecasts through 2050 under a standardized set of assumptions. The BAWSCA study indicates that Mountain View's total retail water demand in 2050 will be approximately 12.46 million GPD under baseline conditions without additional conservation efforts, and approximately 11.71 million GPD with passive and active conservation (BAWSCA 2025)—assuming a higher population than the 2020 UWMP (148,000). Both the baseline conditions and conservation scenarios projected by BAWSCA are notably lower than the demand of 12.64 million GPD reflected in the City's 2020 UWMP Scenario B. Therefore, Scenario B provides a conservative estimate of projected water demands for the City of Mountain View without the Project.

Consistent with this context, the Utility Impact Study, which provides the basis for this analysis, relies on the growth projections used in the City's UWMP as well as the addition of 32,000 residents through 2050 that would be facilitated by project implementation (Appendix G). For an accurate characterization of water supply, demand, and growth projections, this EIR references the BAWSCA study values as an updated regional benchmark which indicates that even with a growing population, long-term per-capita use is expected to be moderated to lower total 2050 demand levels than what is currently projected by the City's 2020 UWMP. The City's 2025 UWMP will update Mountain View's official growth and demand projections and, once adopted, will supersede interim planning assumptions. Accordingly, this EIR relies on the 2020 UWMP as the applicable City baseline, but recognizes that the BAWSCA study projections may more accurately depict the growth and demand projections applicable to the project area.

Supply Reliability

Mountain View's water supply reliability is dependent on a diversified supply portfolio, comprised of SFPUC wholesale deliveries, Valley Water treated supplies, City-owned groundwater wells, and recycled water. The City's 2020 UWMP determines that available supplies exceed projected demands under normal year conditions and identifies potential shortfalls during dry years if SFPUC experiences delivery reductions under the SFPUC Bay Delta Plan scenario. These shortfalls would be addressed through a combination of staged conservation measures in the City's Water Shortage Contingency Plan and increased reliance on groundwater. (City of Mountain View 2021a). Although Valley Water supplies a smaller amount of the City's total water supply, Valley Water is projected to meet Countywide demands through 2045 in normal and drought conditions using a mix of State Water Project/Central Valley Project imports, local reservoirs, managed recharge, banking, and recycled or purified water (City of Mountain View 2021a). Groundwater, specifically City-owned wells in the Santa Clara Subbasin, is the City's primary drought-reliability buffer. The subbasin is managed by Valley Water and has operational storage up to approximately 178,566 million gallons (548,000 AF) and an established record of maintaining sustainable levels through managed recharge and conjunctive use. Accordingly, the 2020 UWMP states an explicit reliance on increased groundwater production during SFPUC-shortage years to close the gap between water supply and demand in dry years while maintaining public health and safety. Additionally, recycled water offsets a portion of non-potable demands, and remains available in normal and dry years, with quality and reliability improvements planned by the Palo Alto Regional Water Quality Control Plant and its partners (City of Mountain View 2021a). While recycled volumes are modest relative to total demand, they improve overall system reliability. Considering this diversified water supply portfolio, the 2020 UWMP concludes that Mountain View expects to meet projected water demand during normal and dry-year scenarios using a combination of existing supplies and demand reduction measures. In summary, the 2020 UWMP identifies total capacity rights of up to 18.26 million GPD of potable water (plus 0.4 – 3.0 million GPD of recycled water) in normal years. In multiple dry years under the Bay Delta Plan scenario, this supply could be reduced to 11.52 million[1] GPD of potable water (plus up to 3 million GPD of recycled water).

The Utility Impact Study supports this conclusion. When compared to the 2020 UWMP Scenario B (Plumbing Codes) 2045 demand projections of 12.64 million GPD, water demand associated with the project would equate to an approximately 12.7 percent increase from overall water demand in Mountain View projected for 2045, to 14.24 million GPD (Appendix G). In high-demand and dry-year conditions, the City's supply reliability strategy remains consistent. On the supply side, the City would rely on SFPUC and Valley Water as available and shift production to groundwater during SFPUC dry years (resulting in total supply of 11.52 million GPD available of potable water). On the demand side, the City would activate Water Shortage Contingency Plan strategies to ensure targeted water use reductions of 20% while maintaining essential uses (resulting in a total water demand of 11.4 million GPD of potable water). Because Valley Water and recycled supplies remain available across all year types and because the City retains Subbasin well capacity, the City's water supply is expected to provide sufficient reliability through the project's buildout horizon of 2050.

The increase in population and subsequent increase in water demand facilitated by project implementation would occur gradually over time, concurrently with water conservation efforts. Additionally, as described above, the estimated increase in water demand is conservative, as it does not take such conservation efforts into account. Therefore, with the implementation of already

[1] Under this scenario, the SFPUC would provide as little as 46 percent of the City's supply guarantee of 12.46 million GPD, which equals 5.73 million GPD. 5.73 + 1.05 (Valley Water) + 4.74 (Groundwater) = 11.52 million GPD.

planned water conservation measures, the gradual nature of development to be facilitated by the project, the diverse water supply portfolio, and strategies for drought response outlined by the City's Water Shortage Contingency Plan, the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. This impact would be less than significant.

Mitigation Measures

This impact would be less than significant without mitigation. Mitigation would not be required.

Threshold 4:	Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
Threshold 5:	Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact UTIL-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE THE AMOUNT OF SOLID WASTE THAT IS TRANSPORTED TO AND DISPOSED OF AT THE KIRBY CANYON RECYCLING AND DISPOSAL FACILITY. THIS SOLID WASTE WOULD NOT EXCEED STATE OR LOCAL STANDARDS OR THE CAPACITY OF LOCAL INFRASTRUCTURE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As described in Chapter 2, *Project Description*, the proposed project would result in an estimated 16,000 additional units compared to baseline future conditions. CalRecycle estimates that multi-family residential uses generate an average of four pounds of solid waste per unit per day (CalRecycle 2025a). In accordance with California's Integrated Waste Management Act of 1989, cities and counties are required to divert 50 percent of all solid waste from landfills. As of 2024, Mountain View diverts approximately 84 percent of potential landfill waste, with a goal of 90 percent by 2030 (City of Mountain View 2025b). As shown below in Table 4.15-3, prior to implementation of State-mandated diversion requirements, development associated with the proposed project would generate an estimated 64,000 net pounds per day of solid waste, which equates to 32 tons or 118.5 cubic yards per day. Assuming 84 percent diversion of all solid waste associated with future development, the proposed project would generate an additional 5.12 tons per day of solid waste for disposal at landfills, which would decrease to 3.2 tons per day of solid waste assuming the City achieves its goal of 90 percent waste diversion.

Table 4.15-3 Estimated Solid Waste Generation for Operation of the Proposed Project

Potential Buildout Development/ Land Use	Quantity	Units	Generation Rate	Solid Waste (pounds per day)	Solid Waste (tons per day)	Solid Waste (cubic yards per day)[1]
Residential	16,000	dwelling units	4 pounds/ unit/day	64,000	32	118.5
Total Assuming 84% Diversion Rate				**10,240**	**5.12**	**19**
Total Assuming 90% Diversion Rate				**6,400**	**3.2**	**12**

[1] 1 ton = 3.7037037037 yard^3
Source: CalRecycle 2025a

As discussed above in Section 4.15.3(d), *Solid Waste*, the main landfill that serves the City of Mountain View is the Kirby Canyon Recycling and Disposal Facility in San Jose. As of the most recent reporting, Kirby Canyon had a max permitted throughput of 2,600 tons per day, an overall remaining capacity of 16,191,600 cubic yards of waste, and an estimated closure date of December 31, 2059. The project would generate approximately 32 tons of solid waste per day with zero diversion, and 5.12 tons of solid waste per day with a waste diversion rate of 84 percent. Even before diversion, the daily solid waste generation associated with maximum buildout of the project represents 1.23 percent of the daily permitted throughput[2], which decreases to 0.197 percent with a waste diversion rate of 84 percent[3] (CalRecycle 2025b).

Assuming 1,869 cubic yards as an annual solid waste generation rate, the project would cumulatively generate approximately 65,415 cubic yards of solid waste over a period of 35 years (Kirby Canyon's expected lifetime), which would equate to approximately 1.5 percent of Kirby Canyon's total remaining capacity of 16,191,600 cubic yards (United States Environmental Protection Agency 2016). Given that the project's solid waste generation over a period of 35 years would represent approximately 1.5 percent of Kirby Canyon's overall capacity, Kirby Canyon would have continue to have substantial remaining capacity to accommodate waste generated by additional regional growth. Therefore, Kirby Canyon has sufficient remaining capacity to accommodate the solid waste disposal needs that would be anticipated from the growth under the proposed project.

Although Kirby Canyon's remaining capacity was reaffirmed by a 2024 permit review, it is possible that the landfill's remaining capacity has declined since initially recorded in 2015. Should the Kirby Canyon Landfill reach capacity, solid waste generated by the city may be diverted to other nearby landfills, such as the Newby Island Sanitary Landfill. The Newby Island Sanitary Landfill has a maximum throughput of 4,000 tons per day and a remaining capacity of 16.6 million cubic yards, and is estimated to remain operational through January 1, 2041 (CalRecycle 2025c). Using a 2025 baseline, the estimated 2041 closure provides an effective 16-year remaining operating horizon. With the City's current waste diversion rate of 84 percent, the annual waste generation rate associated with the project would be reduced to 1,869 cubic yards of solid waste per year, or 29,904 cubic yards over a period of 16 years, which is equivalent to 0.18 percent of Newby Island's remaining capacity.[4] Accordingly, even when bounded by the Newby Island Sanitary Landfill estimated 2041 closure date, the solid waste disposal volume associated with the project would represent a small fraction of the landfill's remaining capacity, and consistent with regional transfer operations, any future redirections after the landfill's 2041 closure would be accommodated at other permitted Class III landfills without the need for constructing new disposal facilities.

Therefore, although the proposed project would increase solid waste generation, the remaining capacity of the Kirby Canyon Landfill and other nearby facilities, such as the Newby Island Sanitary Landfill, are anticipated to be able to accommodate this increase in solid waste generation. Future regional landfill capacity will continue to be addressed through State and local solid waste planning processes, including the siting, permitting, and expansion of disposal facilities as needed, which occur independently of individual development projects.

[2] Percent of permitted throughput = (32.0 tons per day/2,600 tons maximum permitted throughput) x 100 = 1.23%
[3] Percent of permitted throughput with 84% diversion = (1,869 tons per year/365) = 5.12 tons per day; (5.12 tons per day/2,600 tons max permitted throughput) x 100 = 0.197%.
[4] ((1,869 cubic yards x 16 years) / 16,600,000 cubic yards capacity) x 100 = 0.18%

Continued compliance with applicable regulations and General Plan policies listed in the Solid Waste Regulatory Setting would ensure that development facilitated by the proposed project complies with federal, State, and local statutes and regulations related to solid waste and would lead to increased recycling and waste diversion. Local infrastructure would have the capacity to accommodate solid waste generated by the project. Development facilitated by the project would also be required to demonstrate compliance with all applicable regulations. Therefore, anticipated rates of solid waste disposal from the proposed project would have a less than significant impact related to solid waste disposal facilities.

Mitigation Measures

This impact would be less than significant without mitigation. Mitigation would not be required.

4.15.4 Cumulative Impacts

IMPACT UTIL-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACT ANALYSIS AREA WOULD NOT RESULT IN A CUMULATIVELY SIGNIFICANT IMPACT ON WATER SUPPLY INFRASTRUCTURE OR WATER DEMAND, WASTEWATER TREATMENT CAPACITY, STORMWATER FACILITIES, SOLID WASTE DISPOSAL, TELECOMMUNICATIONS SERVICES, ELECTRICITY SUPPLY, OR NATURAL GAS FACILITIES. CUMULATIVE UTILITIES IMPACTS WOULD BE LESS THAN SIGNIFICANT, AND THE CONTRIBUTION OF THE PROJECT WOULD NOT BE CUMULATIVELY CONSIDERABLE.

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3].). The cumulative setting for this analysis includes the service areas of the utility providers. Please refer to Table 3-1 in Chapter 3, *Environmental Setting*, of this EIR for additional information on the projects being considered as part of the cumulative analysis below.

Water

The implementation of cumulative development would include the construction of new water supply facilities, particularly in the form of site-specific service connections and conveyance pipes. Potential environmental impacts associated with developing new water supply connections would be evaluated and mitigated as necessary as part of the lead agency's review of individual development applications for consistency with applicable General Plan policies and Municipal Code requirements, and potential cumulative impacts related to new or expanded water supply infrastructure (Impact UTIL-1) would be less than significant, as infrastructure needed for water supply would be site-specific and mitigated on a project-specific basis, thereby avoiding the potential for impacts to combine with similar impacts of other projects.

The analysis above, provided under Impact UTIL-2, is cumulative in nature and considers water demand associated with development within the City of Mountain View, SFPUC, and Valley Water service areas. Cumulative development would increase the number of residential units and square footage of non-residential uses in the project area and would introduce associated water demands. Cumulative development would be required to be consistent with existing General Plan and Zoning Code requirements. As discussed under Impact UTL-2, the UWMP includes demand reduction measures to reduce water demand in times of drought or water shortages. Implementation of these measures, if necessary, would reduce impacts to water supply associated with cumulative development. Therefore, the cumulative impact related to water supply would be less than significant, and the proposed project would not considerably contribute to a significant impact.

Wastewater

Cumulative development will continue to increase demands on the existing wastewater treatment facilities. As discussed under Impact UTIL-1, development facilitated by the proposed project would generate an estimated 1.2 MGD of wastewater per day, which is approximately 3 percent of the remaining capacity of City of Palo Alto Regional Water Quality Control Plant, and 14 percent of Mountain View's remaining contractual capacity at the RWQCP. This equates to 1.34 MGD AAF, which is 15.8 percent of Mountain View's existing contractual capacity, and would represent approximately 30 percent of the City's projected remaining contractual capacity in 2045. The Palo Alto RWQCP wastewater treatment plant currently has sufficient capacity to serve the anticipated growth in Mountain View under the proposed project and in the region, as a whole. Therefore, the cumulative impact related to wastewater treatment would be less than significant, and the development facilitated by the proposed project would not considerably contribute to significant cumulative impact.

Stormwater

Cumulative development in Mountain View would continue to increase the discharge of stormwater into the city's stormwater system. This could result in cumulative impacts if the amount of stormwater exceeds the capacity of the existing system. The City of Mountain View and service areas of utility providers are subject to the San Francisco Bay Region Municipal Regional Stormwater NPDES Permit and City stormwater guidelines, which require on-site treatment and retention measures for projects creating or replacing more than 10,000 square feet of impervious surfaces. Development facilitated by the proposed project, and all other cumulative development in Mountain View would be required to adhere to these regulations which would reduce the likelihood of a cumulatively considerable impact occurring. Furthermore, as discussed in Section 4.8, *Hydrology and Water Quality*, the project would have a less than significant impact on the stormwater system within the city. Therefore, the project would not contribute to a cumulatively considerable stormwater impact.

Solid Waste

Cumulative development in Mountain View and the surrounding areas will continue to increase solid waste generation for disposal at landfills that serve the county. Cumulative development predominantly consists of residential and commercial uses within previously developed areas, and would increase demand for solid waste disposal services due to increasing solid waste generation. State-mandated solid waste diversion rates (for recycling) would continue to minimize the quantity of waste directed to area landfills, as would the City goal of 90 percent waste diversion by 2030. In addition, compliance with applicable regulations and with General Plan goals, policies, and actions would maintain or improve upon existing solid waste diversion rates. It is assumed the City of Mountain View will continue the historical trend to divert at least 84 percent of solid waste from landfills (City of Mountain View 2025b). As discussed in Impact UTIL-3, development facilitated by the proposed project would generate a limited amount of solid waste. This incremental increase in solid waste would not considerably contribute to a significant cumulative impact related to solid waste disposal.

Telecommunications, Electricity, and Natural Gas

The geographic extent of cumulative analysis for telecommunications, electricity, and natural gas includes the entire service areas of the providers for each of these utilities.

Telecommunications

Telecommunications and internet services in Mountain View are provided by private companies, including AT&T and Xfinity from Comcast, Verizon, and more (Broadband Now 2025). Connections for new telecommunications services are implemented on an as needed basis, and the service provider used is generally at the discretion of the customer. Cumulative projects will establish telecommunications service connections in the same manner as residential developments under the proposed project. There are no anticipated limitations to the availability of telecommunications service. Potential cumulative impacts associated with telecommunications would be less than significant.

Electricity and Natural Gas

Mountain View residents rely on SCVE and PG&E as the electricity and natural gas providers. They are responsible for distributing electricity and natural gas to all land uses within its service area, including in Mountain View. PG&E is subject to the requirements set forth and/or enforced by the California Public Utilities Commission (CPUC). The need for electric and natural gas infrastructure would be addressed on a case-by-case basis for each cumulative project, and would be subject to CPUC requirements, similar to those applicable to implementation of the proposed project. Therefore, cumulative impacts related to electric power and natural gas transmission facilities would be less than significant. The proposed project would not have a cumulatively considerable contribution to a cumulative impact regarding electricity and natural gas.

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4.16 Impacts Found to be Less Than Significant

CEQA Guidelines Section 15128 requires an EIR to briefly describe effects that were determined not to be significant and were, therefore, not discussed in detail in the EIR. This section addresses the potential environmental effects of the Proposed Project that were found not to be significant. The CEQA topics listed below that were not found to be significant are contained in the environmental checklist form included in Appendix G of the most recent update of the *CEQA Guidelines*.

4.16.1 Agricultural and Forestry Resources

Thresholds of Significance

To determine whether a project would result in a significant impact to Agricultural and Forestry Resources, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

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

Impact Analysis

The R3 Zoning District Update sites are located within urbanized areas of Mountain View. The City's General Plan land use map does not identify any agriculture or forestry resources in Mountain View. Although the City's zoning map does identify agricultural land, it is limited within the city limits and none of that identified land is located on or adjacent to the R3 Zoning District Update sites. The Farmland Mapping and Monitoring Program of the California Department of Conservation does not identify lands in Mountain View as Prime Farmland or Farmland of Local Importance (California Department of Conservation [DOC] 2025). There is a small area south of East Middlefield Road and east of SR 85 that is designated as Unique Farmland. However, neither the R3 Zoning Update sites or adjacent properties are identified as farmland types under the Farmland Mapping and Monitoring Program, and do not support forest land or resources (DOC 2025).

There are no areas of forest land identified in Mountain View and the R3 Zoning District Update sites are not located on or adjacent to forest land, and so the Project would not result in the conversion of forest land to non-forest use. Therefore, the Project would have no impact with respect to non-agricultural use; conflict with agricultural zoning or the Williamson Act contract; result in the loss of forest land or conversion of forest land to non-forest use; or conversion of farmland to non-agricultural use. No impact would occur.

4.16.2 Energy

Setting

Electricity is primarily consumed in the built environment for lighting, appliances, heating and cooling systems, and other uses such as industrial processes in addition to being consumed by alternative fuel vehicles. Most of California's electricity is generated in state, with approximately 23 percent imported from the northwest and southwest regions of the United States in 2023 (California Energy Commission [CEC] 2025a). In addition, approximately 56 percent of California's electricity supply in 2023 came from renewable energy sources, such as wind, solar photovoltaic, geothermal, and biomass (CEC 2025a). In 2018, Senate Bill 100 accelerated the state's Renewable Portfolio Standards Program, codified in the Public Utilities Act, by requiring electricity providers to increase procurement from eligible renewable energy and zero-carbon resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

The smallest scale at which energy consumption information is readily available in California is at the county level. Therefore, energy consumption in Santa Clara County is used herein to characterize the existing consumption of electricity and natural gas in Mountain View. According to the California Energy Commission (CEC), Santa Clara County consumed approximately 17,102 GWh of electricity in 2022 from residential and non-residential uses (CEC 2025b). Mountain View is served by Silicon Valley Clean Energy (SCVE), which supplies electricity to all accounts (residential, business, and municipal) and is delivered through Pacific Gas and Electric (PG&E) infrastructure. SCVE builds and buys power mainly from clean sources like wind, solar, and hydropower. SCVE provides clean electricity for 96 percent of residents and businesses across the 13 Silicon Valley communities (SCVE 2025). Santa Clara County consumed approximately 424 million therms of natural gas in 2022 in both residential and non-residential uses (CEC 2025c).

Petroleum fuels are primarily consumed by on-road vehicles and trucks and off-road equipment in addition to some industrial processes, with California being one of the top petroleum-producing states in the nation (CEC 2025d). Gasoline, which is used by light-duty cars, pickup trucks, and sport utility vehicles, is the most used transportation fuel in California with 11.7 million gallons sold in 2023 (CEC 2025e). Diesel, which is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles, is the second most used fuel in California with 2.98 million gallons sold in 2023 (CEC 2025e).

The City of Mountain View adopted a Climate Protection Roadmap (CPR) in 2015, and a Sustainability Action Plan (SAP) in 2019, which outline building energy reduction, building energy efficiency, and electrification strategies (City of Mountain View 2015; 2019).

Energy consumption is directly related to environmental quality in that the consumption of nonrenewable energy resources releases criteria air pollutant and greenhouse gas (GHG) emissions into the atmosphere. The environmental impacts of air pollutant and GHG emissions associated with the Project's energy consumption are discussed in detail in Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*, respectively.

Thresholds of Significance

To determine whether a project would result in a significant impact to Energy, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

1. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation;
2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Impact Analysis

1) Future development under the Proposed Project would consume energy during construction and operation, using petroleum fuel, natural gas, and electricity, as discussed below.

Construction

Energy use during construction associated with future development under the Proposed Project would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. Temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during the construction of individual projects would be temporary in nature, and equipment used would be typical of construction projects in the region. It is reasonable to assume contractors would avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. Construction of the Project would comply with the California Air Resources Board's (CARB) In-Use Off-Road Diesel-Fueled Fleets Regulation, which imposes limits on idling and restricts the use of older vehicles, which are typically less fuel efficient compared with newer vehicles and equipment. The CALGreen Building Standards Code, which are mandatory, includes specific requirements related to recycling, construction materials, and energy efficiency standards that would apply to construction of the Proposed Project. Construction activities associated with reasonably foreseeable development under the Proposed Project would be required to utilize fuel-efficient equipment consistent with federal and State regulations and would comply with State measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. These practices would result in efficient use of energy during construction of future development under the Proposed Project. Therefore, future construction activities associated with development under the Proposed Project would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and this impact would be less than significant in relation to construction.

Operation

Operational energy use would include the use of transportation fuel. California requires that all motorists use California Reformulated Gasoline, a cleaner formulation of gasoline that results in lower emissions of ozone, CO and other air pollutants when burned. The Proposed Project would facilitate housing development on infill sites and on sites in proximity to corridors served by Class I, II, and III bicycle lanes and bus stops, such as California Street, Montecito Avenue, Middlefield Road, and the Stevens Creek Trail. All R3 Zoning District Update sites are located within a half-mile walk to a bus station. The Proposed Project would increase housing in areas served by pedestrian and bicycle facilities and within walking and biking distance to stations to facilitate the use of alternative modes of transportation, which would reduce consumption of gasoline. Therefore, the energy consumption of transportation fuels occurs regardless of the Proposed Project, and the fuel consumed for vehicle trips would not be wasteful or excessive.

In addition to transportation energy use, operation of the Project would consume electricity for building power, lighting, and water conveyance, among other operational requirements, and would utilize natural gas for heat, also consuming energy. Nonetheless, the Proposed Project would be required to comply with all standards set in the latest iteration of the California Building Standards Code (California Code of Regulations Title 24), adopted pursuant to Mountain View City Code Section 8.10.1, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources by the built environment during operation. California's CalGreen standards (California Code of Regulations Title 24, Part 11) require implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Further, the 2022 Building Energy Efficiency Standards (California Code of Regulations Title 24, Part 6) require newly constructed buildings to meet energy performance standards set by the CEC. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. Therefore, it would be expected that building energy consumption associated with the Proposed Project would not be more inefficient, wasteful, or unnecessary than for any other similar buildings in the region. Pursuant to CalGreen, all plumbing fixtures used for the Proposed Project would be high-efficiency fixtures, which would minimize the potential inefficient or wasteful consumption of energy related to water and wastewater.

Project operation would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

2) The City of Mountain View has adopted sustainability goals through its General Plan and Climate Protection Roadmap (CPR), adopted in September 2015, which aims to reduce GHG emissions, promote energy efficiency, and support climate resilience across sectors. The Land Use Design and Infrastructure and Conservation Elements of the General Plan, as well as policies outlined in the CPR, encourage energy efficiency and renewable energy. Policies including, but not limited to, LUD-10.5, LUD-10.6, INC-13.5, INC-14.1, INC-14.2, INC-14.3, INC-15.1, and INC-15.3 specifically promote building energy efficiency and the deployment of renewable energy technologies throughout the city. The CPR also prioritizes the transition to renewable energy through specific strategies such as Strategies A2 and B1, which focus on developing large scale renewable energy generation and installing solar panels on new construction. The California Green Building Standards Code (CALGreen) and Title 24 energy efficiency standards apply to new construction and major renovations, ensuring that development facilitated by the Project meets statewide energy performance requirements.

Applicable state plans for renewable energy or energy efficiency include the Warren-Alquist Act, Assembly Bill (AB) 2076, Senate Bill (SB) 100, SB 350, AB 1493, AB 1007, the Energy Action Plan, Title 24, and CALGreen, which collectively promote energy conservation, vehicle emissions reductions, and a transition to renewable energy sources. SB 100, for example, requires 60 percent of electricity sales to come from renewable sources by 2030, while SB 350 supports doubling energy efficiency in buildings.

The R3 Zoning District Update supports these state and local plans by facilitating increased housing capacity in areas with strong access to public transit, helping to reduce dependence on automobile travel and supporting more energy-efficient lifestyles. The proposed zoning changes would enable higher-density housing on sites located near major transit routes, employment centers, and amenities, thereby reducing trip lengths and energy consumption associated with transportation. Additionally, the Project would implement form-based development standards that promote

sustainable design, landscaping, and resource-efficient buildings. These measures align with both the City's CRP and statewide objectives to reduce fossil fuel use and enhance energy resilience.

The Project would not conflict with or obstruct implementation of any state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

4.16.3 Mineral Resources

Setting

The R3 Zoning District Update sites are located within urbanized areas of Mountain View. The city of Mountain View is classified by the California Department of Conservation as MRZ-1, which indicates that there is adequate information to indicate that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence (DOC 1996). Therefore, there are no significant mineral resources within the City limits. There are also no mining operations in or near the R3 Zoning District Update sites.

Thresholds of Significance

To determine whether a project would result in a significant impact to Mineral Resources, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

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

Impact Analysis

1-2) The R3 Zoning District Update sites and surrounding properties are part of an urbanized area with no current oil or gas extraction. According to the California Department of Conservation, the sites are not designated as a significant mineral resources zone as there are no mineral deposits in the area, and the Project would not alter or displace mineral resources or mining activities (DOC 1996). No impacts would occur.

4.16.4 Wildfire

Setting

According to maps prepared by the California Department of Forestry and Fire Protection (CAL FIRE), Mountain View is not located in a state responsibility area (SRA) or local responsibility area (LRA) fire hazard severity zones (FHSZs). The R3 Zoning District Update sites are not located within or near (within 1 mile of) a Very High Fire Hazard Severity Zone or SRA. The nearest Very High Fire Hazard Severity Zone is located approximately 2.5 miles southwest of Site 13 (CAL FIRE] 2025).

Thresholds of Significance

To determine whether a project would result in a significant impact to Wildfire, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

1. Be located in or near state responsibility areas or lands classified as very high fire hazard severity zones and substantially impair an adopted emergency response plan or emergency evacuation plan;

2. Be located in or near state responsibility areas or lands classified as very high fire hazard severity zones and due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
3. Be located in or near state responsibility areas or lands classified as very high fire hazard severity zones and require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
4. Be located in or near state responsibility areas or lands classified as very high fire hazard severity zones and expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Impact Analysis

1, 2, 3, 4) Neither the R3 Zoning District Update sites nor the city as a whole are located in or near a VHFHSZ in an SRA or LRA. The Project area and its surroundings are developed with residential, commercial, and public facilities. The R3 Zoning District Update sites and their immediate surroundings are urbanized and not adjacent to wildlands. The nearest designated wildfire hazard area is approximately 2.5 miles southwest of Site 13, located at Continental/Dale. The R3 Zoning District Update would primarily facilitate higher-density residential development on existing parcels within an already urbanized setting. No new public infrastructure such as roads, power lines, or water mains would be constructed in undeveloped, high fire-risk areas.

Typical California wildfire behavior indicates that fire spread is more rapid on sloping terrain and in areas with heavy fuel loads. The topography of the city is characterized as being primarily in flat, urbanized areas lacking significant slopes or vegetation, and would not be prone to extreme wildfire behavior. The R3 Zoning Update sites are not located within landslide hazard areas (see Section 4.5, *Geology and Soils*) and are largely not located within flood hazard zones (see Section 4.8.4, *Hydrology and Water Quality*). The generally flat topography of the city further reduces the potential for landslide or flooding hazards, including post-fire conditions.

In addition, the City of Mountain View maintains an Emergency Operations Plan and fire safety policies to guide emergency preparedness and evacuation protocols for the community. Development facilitated under the R3 Zoning District Update would be subject to compliance with the City's Fire Code (MMC Section 14.10) and would undergo individual project review to ensure adequate emergency vehicle access, evacuation routes, and adherence to fire safety standards. These provisions would reduce the potential for conflicts with adopted emergency response and evacuation plans.

Therefore, the proposed R3 Zoning District Update would not substantially impair an adopted emergency response plan or emergency evacuation plan; would not expose future project occupants to pollutant concentrations from wildfire; would not involve the construction or maintenance of infrastructure in high fire-risk areas; and would not increase the risk of flooding or landslides as a result of post-fire effects. Furthermore, the Project would be required to comply with existing regulations, City codes, and review processes. Accordingly, impacts related to wildfire would be less than significant.

5 Other CEQA Required Discussions

This section discusses the potential significant environmental effects that cannot be avoided, growth-inducing impacts, and irreversible environmental impacts associated with the implementation of the Proposed Project.

5.1 Growth Inducement

Section 15126(d) of the *CEQA Guidelines* requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The Proposed Project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

5.1.1 Population Growth

As discussed in Section 4.11, *Population and Housing*, of the Environmental Impact Report, the Proposed Project could facilitate development of up to 16,000 new residential units and would therefore directly generate population growth. The current estimated population of Mountain View is 86,513 (California Department of Finance [DOF] 2025). As of 2025, average household size is 2.3 persons per household, while persons per unit in multifamily development is approximately 2.0[1] Based on this generation rate, the Project could add up to an estimated 32,000 new residents with full buildout, which would increase Mountain View's population to 177,800 residents. The current estimated number of housing units in Mountain View is 40,534 units (DOF 2025). There are a number of other areas in the City where significant residential growth can be accommodated under existing zoning (such as El Camino Real, North Bayshore, San Antonio and East Whisman). These areas are expected to add capacity for up to approximately 70,000 units across the City. When combined with the projected 16,000 units from the Proposed Project, the number of housing units in Mountain View would increase to 84,900 units.

Plan Bay Area 2050 is the most recent regional long-range plan and regional growth forecast for the Bay Area (ABAG and MTC 2021). While it does not provide projections by city, it includes housing and employment forecasts for "Growth Geographies," which are areas identified for future development based on proximity to transit and access to opportunity. Mountain View is located within Transit-Rich Areas and High-Resource Areas, both of which are designated Growth Geographies in the plan. As discussed in Section 4.11, *Population and Housing,* and described in Table 4.11-2, ABAG projects approximately 74,650 housing units in Mountain View by 2050. The proposed R3 Zoning District Update, in combination with the City's Housing Element, would facilitate a potential total of up to 84,900 housing units by 2050. This represents a 13.7 percent increase in housing units over ABAG's projected buildout for the city.

[1] The estimated number of 2.0 persons per multifamily household used in this analysis was calculated by City of Mountain View planning staff. This estimate is based on the City's total population in multifamily units and the number of multifamily housing units present in Mountain View.

As discussed in Chapter 2, *Project Description*, the State requires that all local governments adequately plan to meet the housing needs of their communities. The City's 6th cycle Housing Element, adopted in 2023, was prepared and adopted to meet State requirements and accommodate regional population growth that generates the need for housing. Although buildout from the Project alone would be within ABAG projected population and housing buildout, when combined with buildout planned by the City's Housing Element, population buildout would exceed ABAG projections. Since the ABAG Regional Growth Forecast is updated with each iteration of the Metropolitan Transportation Plan/Sustainable Communities Strategy, the forecast will be updated in future years to reflect changes associated with updates to each jurisdiction's General Plan, including land use designations. While the Project would facilitate development beyond what is forecast for the city in the ABAG Regional Growth Forecast, the Project would be consistent with state requirements since it facilitates the City's ability to develop housing units at sufficient densities to achieve state objectives for the City's 6th Cycle Housing Element. Further, the growth associated with the Proposed Project is planned and evaluated throughout the EIR. Therefore, the potential increase in housing units associated with the Proposed Project would be within the broader growth projections for the region and would not result in unanticipated or unregulated growth.

The Proposed Project is intended to facilitate residential development in accordance with the goals and policies of the City's 2023-2031 Housing Element. Given that the State is in an ongoing and protracted housing crisis due to an insufficient housing supply, the additional units under the Proposed Project would further assist in addressing the existing crisis and meeting the housing needs of Mountain View. The timing, scale, and location of land development and population growth are shaped by a range of land use and economic factors. Variables include regional economic conditions, market demand for both residential and commercial uses, land availability and cost, access to transportation infrastructure and public services, proximity to employment hubs, housing supply and affordability, and applicable regulatory frameworks. The City's Housing Element identifies how the city will accommodate its share of regional housing needs with available sites and housing programs and policies.

Although certain components of the Proposed Project are consistent with policies and programs contained in the City's Housing Element, the overall growth represented by the Project constitutes new development that was not anticipated by the Housing Element or analyzed in its EIR. This growth responds to broader State and regional planning objectives rather than Housing Element implementation. Mountain View is a community where additional housing supports these objectives due to its existing transportation infrastructure and significant jobs-housing imbalance. The jobs-housing imbalance, which includes a disproportionately higher amount of jobs than housing, is substantial and even with the units proposed under the Proposed Project would not be fully addressed. Accordingly, the Project represents a distinct initiative aimed at advancing regional housing and sustainability goals outside the scope of the Housing Element.

Therefore, the Proposed Project would not result in substantial unplanned population growth, either directly or indirectly.

5.1.2 Economic Growth

The Proposed Project would facilitate new residential development and would not directly result in new commercial or other uses that would generate employment opportunities. Development facilitated by the Project would generate temporary employment opportunities during construction. However, construction workers would be expected to be drawn primarily from the existing regional work force, and project construction would not be growth-inducing from an employment

standpoint. Further, operation of proposed new residences may involve additional residential service-related jobs (such as for maintenance, landscaping or domestic workers). However, these jobs would also be expected to be drawn primarily from the existing regional workforce and would not be growth-inducing from an employment standpoint. The Proposed Project would not induce substantial economic expansion to the extent that direct physical environmental effects would result.

The proposed R3 Zoning District Update would not directly result in new commercial or office development intended to generate substantial employment opportunities. While the Project allows for limited neighborhood-serving commercial uses and live-work units, these are intended to support residential neighborhoods and are not expected to induce significant job growth. However, as noted in Table 2-2 in Chapter 2, *Project Description,* the Project could result in a marginal increase of approximately 100–250 new jobs. This increase is minimal in the context of the city's projected 2050 employment total of 133,000 jobs and does not represent a substantial shift in the city's employment base.

The Proposed Project would not be expected to induce substantial economic expansion to the extent that direct physical environmental effects would result. Moreover, the environmental effects associated with any future development in or around Mountain View would be addressed as part of the CEQA environmental review for such development projects.

5.1.3 Removal of Obstacles to Growth

The proposed Change Areas are located in a fully urbanized area that is served by existing infrastructure. Because the Change Areas are considered infill development, no major roadway upgrades are anticipated to serve specific future development. Potential upgrades would be minor, such as lane reconfiguration or restriping, and would not include the construction of new arterial or connector roads or extension of arterial or connector roads into undeveloped areas. Although new residential development on the Change Areas may require minor utility upgrades or expansion (e.g., water line connections, site drainage design) on a project-by-project basis, minor utility upgrades would not induce growth outside of the city. As discussed in Section 4.15, *Utilities and Service Systems*, the existing utility systems for water, wastewater, stormwater, electric power, natural gas, and telecommunication facilities have sufficient capacity to serve future development under the Proposed Project. Because development under the Proposed Project would involve redevelopment within an urbanized area and does not require the extension of new infrastructure through undeveloped areas, Project implementation would not remove an obstacle to growth.

5.2 Irreversible Environmental Effects

CEQA Guidelines Section 15126.2(c) requires a discussion of any significant irreversible environmental changes that would be caused by a proposed project. Specifically, Section 15126.2(c) states:

> 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. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irreversible commitments of resources should be evaluated to assure that such current consumption is justified.

The Proposed Project involves amendments to the City of Mountain View's General Plan and Zoning Ordinance to facilitate infill residential development on parcels that are already developed or partially developed. Construction and operation of development facilitated by the Project would involve an irreversible commitment of construction materials and non-renewable energy resources. These materials include concrete, steel, glass, and other building components, as well as energy resources such as electricity and petroleum-based fuels. Consumption of these resources would occur with any development in the region and are not unique to the Proposed Project.

Development facilitated by the Proposed Project would also irreversibly increase local demand for non-renewable energy resources such as petroleum products and natural gas. However, increasingly efficient building design would offset this demand to some degree by reducing energy demands of future development. As discussed in Section 4.16, *Impacts Found to be Less Than Significant*, all future development would be required to comply with the California Energy Code (Title 24, Part 6) and the California Green Building Standards Code (Title 24, Part 11), which include mandatory energy efficiency and conservation measures. These standards require energy-efficient lighting, heating and cooling systems, water fixtures, and building envelopes. Additionally, the City of Mountain View's Climate Protection Roadmap and Sustainability Action Plan promote electrification and renewable energy use, which would further reduce long-term energy consumption. Consequently, development facilitated by the Project would not use unusual amounts of energy or construction materials and impacts related to consumption of non-renewable and slowly renewable resources would be less than significant. Again, consumption of these resources would occur with any development in the region and is not unique to the Proposed Project.

Additional vehicle trips associated with development facilitated by the Proposed Project would incrementally increase local traffic and regional air pollutant and GHG emissions. As discussed in Section 4.2, *Air Quality*, the Project would not result in significant project-level operational air quality and would be consistent with applicable air quality. As described under the cumulative analyses in Section 4.2, *Air Quality*, and Section 4.13, *Transportation*, uncertainty regarding the ultimate amount and distribution of development precludes precise quantification of long-term cumulative effects, and even modest increases in regional VMT may undermine adopted transportation and air quality thresholds. Although the Project promotes VMT-reducing land use patterns and would not result in significant project-level impacts, cumulative regional growth could lead to increases in overall vehicle activity and associated criteria air pollutants. These secondary effects, particularly incremental increases in regional VMT, would commit future generations to sustained reliance on transportation infrastructure and ongoing vehicle use patterns. While the Project itself advances planning objectives intended to minimize such effects, the cumulative impact associated with vehicle emissions and regional growth represents an irreversible environmental change as a result of the Proposed Project.

Development facilitated by the Project would also require a commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. However, as discussed in Section 4.12, *Public Services*, and Section 4.15, *Utilities and Service Systems*, impacts to these service systems would be less than significant and would not require construction of new facilities that could result in significant environmental impacts.

5.3 Significant and Unavoidable Impacts

CEQA requires decision makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. The environmental effects of the Proposed Project, along with recommended mitigation measures, are discussed in detail in Section 4, Environmental Impact Analysis, of this EIR and summarized in the Executive Summary. The following environmental issues were determined to be less than significant, or can be reduced to less than significant with the incorporation of mitigation measures:

- Aesthetics
- Agricultural and Forestry Resources
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services and Recreation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

CEQA Guidelines Section 15126.2(b) requires that an EIR describe any significant impacts, including those that can be mitigated but not reduced to less than significant levels, as a result of implementation of the Proposed Project. Based on the analysis presented in Sections 4.1 through 4.15 of this EIR, the Project would result in significant and unavoidable impacts related to the following topics:

- **Air Quality (Section 4.2, Impact AQ-C-1):** the Project could contribute considerably to cumulative VMT impacts which could result in cumulative operational air quality impacts.
- **Greenhouse Gas Emissions (Section 4.6, Impact GHG-1, Impact GHG-2, and Impact GHG-C-1):** Even with implementation of Mitigation Measure GHG-1, the Project would remain inconsistent with BAAQMD thresholds and the 2022 Scoping Plan.
- **Transportation (Section 4.13, Impact TRA-C-1):** the Project could contribute considerably to cumulative VMT impacts.

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6 Alternatives

6.1 Introduction

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines provides guidance for the identification and evaluation of project alternatives in an Environmental Impact Report (EIR). The *CEQA Guidelines* state that an "EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives."

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines a range of reasonable alternatives to the project that would attain most of the following project objectives:

1. Create opportunities for diverse unit types, including middle-income ownership and stacked flats;
2. Produce better design that reflects the community's vision through objective form-based standards, including pedestrian-friendly neighborhoods, respectful transitions, and increased tree canopy and landscaping;
3. Create opportunities for neighborhood-serving uses;
4. Update the R3 Zoning District to be consistent with state law and the General Plan while addressing Housing Element programs and improving development review;
5. Use density change in targeted areas to achieve desired goals, implement changes to large-parcel areas rather than small, and increase the supply of housing; and
6. Encourage parcel aggregation.

6.2 Project Alternatives

This discussion focuses on alternatives to the Proposed Project, including alternatives that were considered but ultimately rejected from further evaluation. These alternatives have been selected for their ability to reduce or eliminate one or more of the significant adverse impacts associated with the project while still meeting most of the basic project objectives. This EIR also evaluates a No Project Alternative, consistent with the *CEQA Guidelines* Section 15126.6(e).

6.2.1 Alternatives Considered but Rejected from Further Evaluation

Section 15126.6(c) of the *CEQA Guidelines* requires that an EIR identify alternatives that were considered but rejected as infeasible and provide a brief explanation as to why such alternatives were not fully considered in the EIR. As required by the *CEQA Guidelines*, the selection of alternatives for this EIR included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet project objectives. Alternatives that do not clearly provide any environmental advantages compared to the Proposed Project, do not meet basic project objectives, or do not achieve overall lead agency policy goals, have been eliminated from further consideration. The factors that may be considered when addressing the feasibility of alternatives include site suitability, economic viability, availability of

infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (*CEQA Guidelines*, Section 15126.6[f][1]).

CEQA Guidelines Section 15126.6(a) also states that "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." The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. Other alternatives may be considered but are not required to satisfy the requirements of CEQA. For the project, characteristics used to reject alternatives from further consideration include:

- Failure to meet basic project objectives;
- Limited effectiveness in reducing project environmental impacts;
- Inconsistency with City policies;
- Potential for inconsistency with adopted agency plans and policies; and
- Reasonableness of the alternative when compared to other alternatives under consideration.

The following alternatives were considered but eliminated from further analysis by the City of Mountain View due to one or more of these factors.

6.2.1.1 Alternative Location

The first step in considering an off-site alternative is identifying whether any of the significant impacts of the project would be avoided or substantially lessened by siting the project in a different location. Only locations that would avoid or substantially lessen any of the significant impacts of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126.6[f][2][A]). If it is determined that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion (CEQA Guidelines Section 15126.6[f][2][B]).

No alternative locations to undertake the Proposed Project are evaluated in this EIR. The City has determined that residential zoning districts in Mountain View that are designed for low density residential (i.e. R1) are not well-suited to the development of multi-family residential that would be facilitated by the Proposed Project, since the smaller parcels prevalent in these areas tend to constrain economic feasibility at higher densities. A similar argument applies to focusing growth within different R2 and R3 sites. Commercial zones within the city (e.g., CN, CS, CO, zoning districts and precise plans such as El Camino Real and San Antonio) have recently been the focus of increases in residential density, do not provide enough land area for a comparable level of growth potential, and/or could reduce the City's supply of neighborhood-serving commercial if redeveloped as housing. Several industrial zones within the City (e.g., ML areas rezoned to the East Whisman Precise Plan and North Bayshore Precise Plan) have also been recently rezoned to allow higher-density residential, and the remaining areas may be necessary to maintain a balanced and vibrant City economy. The City cannot reasonably acquire or control additional land through annexation or other means in a timely fashion that would allow for the implementation of a project that could facilitate a similar number of additional residential dwelling units. As a result of these considerations, alternative project site locations were considered and rejected, consistent with CEQA Guidelines Section 15126.6(c).

6.2.1.2 Additional Density Increases Across the R3 Zone

The Proposed Project would primarily involve an update to the City of Mountain View's R3 Zoning District to facilitate increased residential densities, increasing maximum allowable densities in the R3-A, R3-D1, and R3-D2 subdistricts to 15-20 units, 50-75 units, and 75-110 units, respectively. The City considered an alternative that would involve greater increase of allowable residential densities in the R3-A, R3-D1, and R3-D2 subdistricts beyond the Proposed Project. Such an alternative would facilitate greater residential growth than the Proposed Project. However, the increased potential for greater residential growth could result in additional demands for public services and utilities and service systems, thereby requiring additional services potentially beyond the capacity of existing public services and utilities infrastructure. In addition, such an alternative would be anticipated to result in additional operational greenhouse gas (GHG) emissions and cumulative Vehicle Miles Traveled. Although this alternative would meet most of the project objectives, because it would generally result in more adverse environmental impacts compared to the Proposed Project, this alternative was rejected from consideration, consistent with CEQA Guidelines Section 15126.6(c).

6.2.2 Description of Alternatives Evaluated

This analysis considers the following three alternatives to the Proposed Project:

- Alternative 1: No Project Alternative
- Alternative 2: No Change in Rowhouse and Condominium Areas
- Alternative 3: Lower-Density Alternative Across All Change Areas

Each of the alternatives is described below. The potential environmental impacts of each alternative are analyzed in Section 6.3.

6.2.2.1 Alternative 1: No Project Alternative

The purpose of describing and analyzing a No Project Alternative is to allow decision-makers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project. According to *CEQA Guidelines* Section 15126.6(e)(3)(C), the lead agency should analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved. Under this Alternative, the proposed new R3 Zoning Subdistricts and development standards would not be implemented. In this case, the No Project Alternative involves continued implementation of the City's existing zoning and General Plan, which would guide development within the R2 and R3 Zoning Subdistricts in accordance with the existing land use designations, policies, and zoning standards. The No Project Alternative does not preclude future development on the R2 and R3 Zoning District sites, but potential future development would be consistent with the existing zoning and General Plan designations on the sites. However, some development that would otherwise occur to take advantage of the higher densities would not occur under the No Project Alternative.

6.2.2.2 Alternative 2: No Change in Rowhouse and Condominium Areas

Alternative 2 would not increase densities in the areas identified as predominantly rowhouses and condominiums in Attachment 5 to the Council Report dated March 25, 2025 (Mountain View 2025). These areas would retain their existing density allowances but would have reduced development standards consistent with the proposed R3-B and R3-C subdistricts. The proposed changes would

still apply to all other identified change areas. By omitting rowhouse and condominium areas, this alternative would result in a modest reduction in overall housing capacity compared to the Proposed Project. It would also reduce the potential for future redevelopment of existing ownership housing, as well as the small sites included in these areas because they are surrounded by rowhouses and condominiums.

6.2.2.3 Alternative 3: Lower-Density Across All Change Areas

Alternative 3 would apply over the same geographic extent of land use changes as the Proposed Project but would apply a lower-density zoning designation across all change areas identified in the Proposed Project. Instead of allowing for development up to 110 units per acre in the R3-D2 designation, this alternative would only include the R3-D1 designation at 50-75 units per acre, and all R3-D2 sites in the Project would be R3-D1. The intent of Alternative 3 is to accommodate incremental growth while limiting additional demand on infrastructure and public services. This approach would result in a substantial reduction in total housing capacity compared to the Proposed Project, and the urban form would evolve more gradually, with fewer larger-scale developments.

6.3 Alternatives Impact Analysis

6.3.1 Alternative 1: No Project Alternative

a. Aesthetics

The No Project Alternative involves continued implementation of the City's existing zoning and General Plan, which would guide development within the R2 and R3 Zoning Subdistricts in accordance with existing land use designations, policies, and zoning standards. Accordingly, less residential development would be facilitated by the No Project Alternative compared to the Proposed Project. Due to the incrementally reduced maximum allowable heights and building mass anticipated to be facilitated by the No Project Alternative, this alternative would have slightly reduced potential to result in adverse impacts to scenic vistas or introduce substantial light and glare compared to the Proposed Project. Residential development facilitated by the No Project Alternative would be required to adhere to existing City Municipal Code, including Section 8.242, and General Plan policies, including Policy LUD-9.5 and Policy LUD-9.6, which would ensure residential development would minimize potential adverse impacts associated with blocking scenic vistas or introducing substantial light and glare on an individual project site, similar to the Proposed Project. Accordingly, the No Project Alternative's impacts related to scenic vistas and light and glare would be reduced compared to the Proposed Project.

As with the Proposed Project, the No Project Alternative would not occur within the vicinity of a designated state scenic highway and no impact would occur.

Unlike the Proposed Project, the No Project Alternative would not include implementation of new objective form-based development standards; however, residential development facilitated by the No Project Alternative would continue to be subject to the City's existing Municipal Code and General Plan policies to ensure consistency with regulations governing visual quality and character. As with the Proposed Project, residential development facilitated by the No Project Alternative would not conflict with applicable zoning or other regulations governing scenic quality. Impacts would be similar to the Proposed Project and would be less than significant.

Summary

Compared to the Proposed Project, the No Project Alternative would result in reduced impacts related to scenic views and light and glare and similar impacts related to scenic highways and zoning conflicts. Overall, both the No Project Alternative and Proposed Project would result in less than significant impacts to aesthetics, as shown in Table 6-1.

b. Air Quality

The No Project Alternative involves continued implementation of the City's existing zoning and General Plan which would guide development within the R2 and R3 Zoning Subdistricts in accordance with the existing land use designations, policies, and zoning standards. Because the No Project Alternative would not increase allowable residential densities beyond existing conditions, it would accommodate less overall population growth than the Proposed Project and would result in fewer additional vehicle trips and lower mobile-source emissions over time. While development under the No Project Alternative would still contribute incrementally to regional growth, the scale of development would be more limited, resulting in a reduced contribution to cumulative regional VMT and associated criteria air pollutant emissions. Accordingly, the No Project Alternative would result in no change in vehicle trips and mobile emissions compared to allowable buildout under existing conditions. As with the Proposed Project, the No Project Alternative would not conflict with the 2017 Clean Air Plan; the impact would be similar to that of the Proposed Project and would remain less than significant.

Because the No Project Alternative would not increase allowed residential density within the R2 and R3 Zoning Subdistricts, this alternative would involve less construction activity and less overall emissions of criteria air pollutants during construction. Individual residential development projects would continue to be subject to Bay Area Air District regulations to minimize impacts associated with criteria air pollutants. Under the No Project Alternative, Mitigation Measures AQ-1, which would require quantitative analysis of individual projects exceeding the Air District's screening criteria, would not be included. However, because the No Project Alternative would result in reduced potential for development compared to the Proposed Project, impacts related to criteria air pollutant release would be reduced compared to the Proposed Project and impacts would be less than significant.

Due to the reduction in construction emissions, this alternative also would result in lower overall emissions of toxic air contaminants during construction. Individual residential development projects would continue to be subject to Bay Area Air District regulations to minimize impacts associated with toxic air contaminants. Under the No Project Alternative, mitigation measures AQ-2 and AQ-3, which would require a construction and operational health risk assessment, respectively, would not be required. However, because the No Project Alternative would result in reduced potential for development compared to the Proposed Project, impacts related to toxic air contaminants would be reduced compared to those of the Proposed Project and impacts would be less than significant.

Similar to the Proposed Project, the No Project Alternative would not include uses that generate substantial odorous emissions. Therefore, the No Project Alternative's impacts related to odors would be the same as the Proposed Project.

Summary

Compared to the Proposed Project, the No Project Alternative would result in reduced impacts related to air pollutant and toxic air contaminant emissions and similar impacts related to conflicts

with the 2017 Clean Air Plan and odors. Overall, the No Project Alternative would result in less than significant impacts to air quality and the Proposed Project would result in less than significant impacts with mitigation, as shown in Table 6-1.

c. Biological Resources

The No Project Alternative involves continued implementation of the City's existing zoning and General Plan which would guide development within the R2 and R3 Zoning Subdistricts in accordance with the existing land use designations, policies, and zoning standards. Less overall residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. Accordingly, development facilitated by the No Project Alternative could result in reduced ground-level disturbances compared to the Proposed Project. Therefore, the No Project Alternative could result in reduced potential for impacts to special-status plant and wildlife species, riparian habitat, wetlands, and wildlife corridors compared to the Proposed Project due to the anticipated increased development footprints as development facilitated by the Proposed Project. Individual residential projects facilitated by the No Project Alternative would be subject to the same federal, state, and local regulations to minimize impacts to biological resources. However, unlike the Proposed Project, the No Project Alternative would not include mitigation measures BIO-1, BIO-2, or BIO-3, which require biological resources screening and assessment, habitat assessments and protocol surveys, and avoidance and minimization. Nevertheless, the No Project Alternative would result in reduced development compared to the Proposed Project and overall slightly reduced impacts compared to the Proposed Project and impacts would be less than significant.

Summary

Compared to the Proposed Project, the No Project Alternative would result in reduced impacts to biological resources. Overall, the No Project Alternative would result in less than significant impacts to biological resources and the Proposed Project would result in less than significant impacts with mitigation, as shown in Table 6-1.

d. Cultural Resources

The No Project Alternative involves continued implementation of the City's existing zoning and General Plan which would guide development within the R2 and R3 Zoning Subdistricts in accordance with the existing land use designations, policies, and zoning standards. Less overall residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. Accordingly, the No Project Alternative could have reduced potential impacts compared to the Proposed Project to facilitate residential development that could adversely affect historical resources, archaeological resources, and human remains. However, unlike the Proposed Project, development facilitated by the No Project Alternative would not include mitigation measures CUL-1a and CUL-1b which require a historic resource evaluation and treatment plan or mitigation measures CUL-2a and CUL-2b which would require an archaeological resource assessment to be prepared and work to halt upon an discovery of an unanticipated resource. As with the Proposed Project, development facilitated by the No Project Alternative would occur in compliance with State Health and Safety Code Section 7050.5, 7051, and 7054 and Public Resources Code Section 5097.98 which sets forth procedures in the event of discovery of human remains. Overall, the No Project Alternative would result in reduced development compared to the Proposed Project and overall

reduced impacts compared to the Proposed Project and impacts would be less than significant. Proposed Project.

Summary

Compared to the Proposed Project, the No Project Alternative would result in reduced impacts to cultural resources. Overall, the No Project Alternative would result in less than significant impacts to cultural resources and the Proposed Project would result in less than significant impacts with mitigation, as shown in Table 6-1.

e. Geology and Soils

The No Project Alternative would facilitate residential development in areas with the same geologic hazards as the residential development facilitated by the Proposed Project would experience. Development facilitated by the No Project Alternative would be subject to the same regulations as residential development facilitated by the Proposed Project, including the California Building Code (CBC) and policies within the City's General Plan Public Safety Element. Residential development would be designed in compliance with these regulations to ensure the risk of loss, injury, or death involving geologic hazards would be similar to the Proposed Project and would remain less than significant.

Less residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones; however, the R3 Zoning District Update sites are generally developed and flat, which limits the potential for substantial soil erosion under existing conditions. The No Project Alternative involves continued implementation of the City's existing zoning and General Plan which would guide development within the R2 and R3 Zoning Subdistricts in accordance with the existing land use designations, policies, and zoning standards. Less overall residential development would be facilitated by the No Project Alternative compared to the Proposed Project. Accordingly, development facilitated by the No Project Alternative would result in less ground-level disturbances compared to the Proposed Project. The No Project Alternative's potential impacts to soil erosion would be slightly decreased compared to the Proposed Project but would remain less than significant.

As with the Proposed Project, residential development facilitated by the No Project Alternative would be connected to the local wastewater treatment system and no septic systems or alternative wastewater systems would be used.

The No Project Alternative involves continued implementation of the City's existing zoning and General Plan which would guide development within the R2 and R3 Zoning Subdistricts in accordance with the existing land use designations, policies, and zoning standards. Less overall residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. Accordingly, development facilitated by the No Project Alternative would result in reduced ground-level disturbances compared to the Proposed Project. As with the Proposed Project, development facilitated by the No Project Alternative would occur in compliance with the Mountain View Standard Condition of Approval (COA) for Discovery of Paleontological Resources in the event of a fossil discovery during construction to ensure that construction is halted, and a qualified paleontologist assesses the find to determine its significance. The No Project Alternative would have slightly reduced impacts to paleontological resources compared to the Proposed Project and impacts would be less than significant.

Summary

Compared to the Proposed Project, the No Project Alternative would result in reduced impacts related to erosion and paleontological resources and similar impacts related to geologic hazards and wastewater systems. Overall, the No Project Alternative would result in less than significant impacts to geology and soils and the Proposed Project would result in less than significant impacts with mitigation, as shown in Table 6-1.

f. Greenhouse Gas Emissions

Less residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. Accordingly, less overall GHG emissions would occur from the No Project Alternative compared to the Proposed Project due to reduced development. However, development under the No Project Alternative would not be concentrated near existing transit facilities to the extent that the Proposed Project is, thereby potentially increasing VMT-associated GHG emissions during operation, leading to long-term GHG emissions increases. As with the Proposed Project, development facilitated by the No Project Alternative could use natural gas which would be inconsistent with Bay Area Air District GHG threshold 1.a of prohibiting natural gas appliances or natural gas plumbing. While it is possible that fewer units would require fewer new gas stoves, the No Project Alternative could modestly reduce building-related GHG emissions relative to existing conditions. However, any such reduction would not fully offset the increase in mobile-source emissions associated with higher VMT under the No Project Alternative. Therefore, as with the Proposed Project, the No Project Alternative would have a significant and unavoidable impact related to GHG emissions.

Summary

Compared to the Proposed Project, the No Project Alternative would result in greater GHG emissions impacts. Overall, both the No Project Alternative and Proposed Project would result in significant and unavoidable impacts to greenhouse gas emissions, as shown in Table 6-1.

g. Hazards and Hazardous Materials

Less residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. Accordingly, the No Project Alternative would result in less overall hazardous materials use for the construction (i.e., fuels, cleaners, solvents, etc.) and operation (i.e., household hazardous chemicals) compared to the Proposed Project. The No Project Alternative's potential impacts related to the use, transport, and storage of hazardous materials and accidental release would be minimized with compliance with existing federal, state, and local regulations related to the safe use of hazardous materials. The No Project Alternative's potential impacts related to the use, transport, and storage of hazardous materials and accidental release would be slightly reduced compared to the Proposed Project but would remain less than significant.

The No Project Alternative involves continued implementation of the City's existing zoning and General Plan which would guide development within the R2 and R3 Zoning Subdistricts in accordance with the existing land use designations, policies, and zoning standards. Less overall residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. Accordingly, the No Project Alternative would result in slightly reduced impacts related to

development on listed hazardous materials sites. Proposed Project. Under the No Project Alternative, Mitigation Measure HAZ-1 would not be included. Nevertheless, the No Project Alternative would have a reduced potential to result in impacts related to development on listed hazardous materials sites compared to the Proposed Project and impacts would less than significant.

The No Project Alternative would facilitate residential development in similar locations as the Proposed Project that are located outside of the safety and noise contours of the Moffett Federal Airfield, similar to the Proposed Project. Therefore, the No Project Alternative would have the same impact related to airport hazards as the Proposed Project, which would remain less than significant.

Less residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. Accordingly, the No Project Alternative would have less potential to interfere with emergency response or evacuation compared to the Proposed Project. As with the Proposed Project, development facilitated by the No Project Alternative would be subject to review by the City of Mountain View Police Department, MVFD, and EOC for compliance with adopted emergency response plans. The No Project Alternative's impact would be reduced compared to the Proposed Project but would remain less than significant.

The No Project Alternative would facilitate residential development in similar locations as the Proposed Project which are located outside of designated Fire Hazard Severity Zones. As with the Proposed Project, the No Project Alternative would have no impact related to wildland fire.

Summary

Compared to the Proposed Project, the No Project Alternative would result in reduced impacts related to hazardous materials handling, hazardous materials sites, and emergency response. The No Project Alternative would result in similar impacts related to airport hazards and wildland fire as the Proposed Project. Overall, the No Project Alternative would result in less than significant impacts to hazards and hazardous materials, and the Proposed Project would result in less than significant impacts with mitigation, as shown in Table 6-1.

h. Hydrology and Water Quality

Less residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. Accordingly, the No Project Alternative would have reduced potential to result in water quality degradation due to a reduction in overall construction activities compared to the Proposed Project. Development facilitated by the No Project Alternative would occur in compliance with the same regulations as development facilitated by the Proposed Project, including the Construction Stormwater General Permit, Chapter 35 of the Mountain View Municipal Code, the Phase I MS4 Permit, and City of Mountain View stormwater requirements, which would minimize the potential for development to substantially degrade water quality, polluted runoff, or conflict with a water quality control plan. Therefore, the No Project Alternative would slightly reduce the Proposed Project's impacts related to water quality degradation, polluted runoff, and conflicts with a water quality control plan, but impacts would remain less than significant.

Less residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. Accordingly, the No Project Alternative would result in less groundwater demand compared

to the Proposed Project. As the Proposed Project would not substantially decrease groundwater supplies or interfere with sustainable groundwater management, the No Project Alternative's reduced groundwater use would also not substantially decrease groundwater supplies or interfere with sustainable groundwater management. The No Project Alternative's impact related to groundwater would be slightly reduced compared to the Proposed Project, but impacts would remain less than significant.

The No Project Alternative would facilitate development in similar locations as the Proposed Project; therefore, the development facilitated by the No Project Alternative within the R3 Zoning District Update sites would not be located within a flood hazard zone and would not be subject to flood risk. As with the Proposed Project, the No Project Alternative would have no impact related to flooding.

Summary

Compared to the Proposed Project, the No Project Alternative would result in reduced impacts related to water quality degradation, polluted runoff, conflicts with a water quality control plan, and groundwater. The No Project Alternative would result a similar impact related to flooding as the Proposed Project. Overall, both the No Project Alternative and Proposed Project would result in less than significant impacts to hydrology and water quality, as shown in Table 6-1.

i. Land Use and Planning

The No Project Alternative would facilitate development in similar locations as the Proposed Project which are primarily infill parcels which would not physically divide established neighborhoods within Mountain View. As with the Proposed Project, the No Project Alternative would not conflict with Plan Bay Area 2050, the City's General Plan, or the El Camino Real Precise Plan as the No Project Alternative would continue development in accordance with the existing land use designations, policies, and zoning standards. However, the No Project Alternative would facilitate less housing than the Proposed Project. Therefore, the No Project Alternative would support the Plan Bay Area 2050 and City policies for housing to a lesser extent compared to the Proposed Project. The No Project Alternative impacts related to land use would be slightly reduced compared to the Proposed Project, but impacts would remain less than significant.

Summary

Compared to the Proposed Project, the No Project Alternative would result in reduced impacts related to land use. Overall, both the No Project Alternative and Proposed Project would result in less than significant impacts to land use and planning, as shown in Table 6-1.

j. Noise

Less residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. Accordingly, the No Project Alternative would result in less overall construction noise, operational noise, and groundborne vibration compared to the Proposed Project. As with the Proposed Project, residential development facilitated by the No Project Alternative would be subject to the City's Standard COAs which would require the use of several noise reduction measures for construction and operation and implementation of vibration best management practices (BMP) during construction. Under the No Project Alternative, Mitigation Measures NOI-1 and NOI-2, which would require pile driving noise and vibration reduction measures, respectively,

would not be included. Nevertheless, the No Project Alternative's impacts related to construction noise, operational noise, and groundborne vibration would be slightly reduced compared to the Proposed Project and impacts would be less than significant.

The No Project Alternative would facilitate residential development in similar locations as the Proposed Project which are located outside of the noise contours of the Moffett Federal Airfield. As with the Proposed Project, the No Project Alternative would have no impact related to airport noise.

Summary

Compared to the Proposed Project, the No Project Alternative would result in reduced construction noise, operational noise, and groundborne vibration impacts. The No Project Alternative would result a similar impact related to airport noise as the Proposed Project. Overall, the No Project Alternative would result in less than significant impacts to noise, and the Proposed Project would result in less than significant impacts with mitigation, as shown in Table 6-1.

k. Population and Housing

Less residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. Accordingly, the No Project Alternative would result in less population growth compared to the Proposed Project. As the Proposed Project's anticipated growth would be within the estimates and plans for growth beyond the horizon of the 2023-2031 Housing Element to accommodate for growth projected by the Association of Bay Area Governments (ABAG), the No Project Alternative's reduced growth would also be within these projections. The No Project Alternative's impact related to population growth would be reduced compared to the Proposed Project, but impacts would remain less than significant.

The No Project Alternative would facilitate less development and redevelopment which would result in less displacement of residents compared to the Proposed Project. Existing state regulations would provide protection for tenants temporarily displaced which would minimize potential adverse impacts due to displacement. The No Project Alternative's potential impacts related to displacement would be reduced compared to the Proposed Project and would remain less than significant.

Summary

Compared to the Proposed Project, the No Project Alternative would result in reduced impacts related to unplanned growth and displacement. Overall, both the No Project Alternative and Proposed Project would result in less than significant impacts to population and housing, as shown in Table 6-1.

l. Public Services and Recreation

Less residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. Accordingly, the No Project Alternative would result in less demand for fire, police, school, parks, or other public facilities compared to the Proposed Project, and would result in slower deterioration of existing recreational facilities compared to the Proposed Project. Accordingly, the No Project Alternative would result in slightly reduced impacts on public services and recreation compared to the Proposed Project, but impacts would remain less than significant.

Summary

Compared to the Proposed Project, the No Project Alternative would result in reduced impacts related to public service and recreation. Overall, both the No Project Alternative and Proposed Project would result in less than significant impacts to public services and recreation, as shown in Table 6-1.

m. Transportation

Less residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. As with the Proposed Project, the No Project Alternative would not include physical changes to existing roadway, transit, bicycle, or pedestrian facilities and would not interfere with implementation of projects outlined in the Plan Bay Area 2050, the Santa Clara County Congestion Management Program, Valley Transportation Plan 2040 Plan, the Countywide Bicycle Plan, the City's General Plan, the Mountain View Pedestrian Master Plan, or Santa Clara Valley Transportation Authority's (VTA) pedestrian improvement strategies. The No Project Alternative's impacts related to conflicts with a transportation plan, program, ordinance, or policy would remain less than significant, same as the Proposed Project.

Less residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. As a result, the No Project Alternative would not result in VMT per capita reductions that would occur under the Proposed Project due to the higher density housing permitted under the Proposed Project. While development under the No Project Alternative would still contribute incrementally to regional growth, the scale of development would be more limited, resulting in a reduced contribution to cumulative regional VMT and associated criteria air pollutant emissions. Accordingly, the No Project Alternative would result in increased impacts compared to the Proposed Project and impacts would be significant and unavoidable.

As with the Proposed Project, individual developments facilitated by the No Project Alternative would be required to be designed in accordance with the standards for vehicle ingress/egress and emergency access set forth within Chapter 14, Article 1 of the City's Municipal Code and the standards of the Mountain View Fire Department. These standards, and review of individual projects from the City and the Mountain View Fire Department would ensure such developments would minimize geometric hazards and provide adequate ingress/egress for emergency access. Accordingly, the No Project Alternative would have similar impacts related to geometric hazards and emergency access as the Proposed Project which would remain less than significant.

Summary

Compared to the Proposed Project, the No Project Alternative would result in increased impacts related to VMT and similar impacts related to conflicts with transportation policies, geometric hazards, and emergency access. Overall, both the No Project Alternative and Proposed Project would result in less than significant impacts to transportation, as shown in Table 6-1.

n. Tribal Cultural Resources

Assembly Bill 52 and Senate Bill 18 consultation carried out as part of the Proposed Project has not identified known tribal cultural resources within the project area. Accordingly, the No Project Alternative, which would facilitate development in the same areas as the Proposed Project, would

not have potential to impact known tribal cultural resources. As with the Proposed Project, individual developments facilitated by the No Project Alternative would undergo site-specific review in accordance with Assembly Bill 52 and Senate Bill 35 which would require project-specific tribal cultural resource identification and consultation, and the appropriate avoidance, minimization, or mitigation would be incorporated. The No Project Alternative would not include implementation of Mitigation Measure TCR-1. Nevertheless, the No Project Alternative would have a reduced potential to result in impacts related to potential disturbance of tribal cultural resources compared to the Proposed Project due to the reduced buildout, and impacts would less than significant.

Summary

Compared to the Proposed Project, the No Project Alternative would result in reduced impacts to tribal cultural resources. Overall, the No Project Alternative would result in less than significant impacts to tribal cultural resources, and the Proposed Project would result in less than significant impacts with mitigation, as shown in Table 6-1.

o. Utilities and Service Systems

Less residential development would be facilitated by the No Project Alternative compared to the Proposed Project as the No Project Alternative would not include density increases in the R2 or R3 zones. Accordingly, the No Project Alternative would decrease water demand, wastewater generation, solid waste generation, and electricity, natural gas, and telecommunication infrastructure demand compared to the Proposed Project. As the Proposed Project would not result in water demand in excess of existing City supplies, wastewater generation exceeding Mountain View's capacity allocation of the Palo Alto Regional Water Quality Control Plant, solid waste exceeding Kirby Canyon Recycling and Disposal Facility capacity, or result in substantial stormwater, electricity, natural gas, and telecommunication infrastructure demand, the No Project Alternative's reduced development would also not result in substantial utility demands. Accordingly, the No Project Alternative would have a reduced impact on utilities and service systems compared to the Proposed Project and this impact would remain less than significant.

Summary

Compared to the Proposed Project, the No Project Alternative would result in a reduced impact to utilities and service systems. Overall, both the No Project Alternative and Proposed Project would result in less than significant impacts to utilities and service systems, as shown in Table 6-1.

6.3.2 Alternative 2: No Change in Rowhouse and Condominium Areas

a. Aesthetics

Alternative 2 would not increase densities in the areas identified as predominantly rowhouses and condominiums. Accordingly, less residential development would be facilitated by Alternative 2 compared to the Proposed Project. Due to the reduced maximum allowable heights and building mass anticipated to be facilitated by Alternative 2 on some parcels, Alternative 2 would have reduced potential to result in adverse impacts to scenic vistas or introduce substantial light and glare compared to the Proposed Project. Residential development facilitated by Alternative 2 would be required to adhere to existing City Municipal Code, including Section 8.242, and General Plan policies, including Policy 9.5 and Policy LUD-9.6, which would ensure residential development would

minimize potential adverse impacts associated with blocking scenic vistas or introducing substantial light and glare on an individual project site. Accordingly, Alternative 2's impacts related to scenic vistas and light and glare would be slightly reduced compared to the Proposed Project but would remain less than significant.

As with the Proposed Project, Alternative 2 would not occur within the vicinity of a designated state scenic highway and no impact would occur.

Alternative 2 would include implementation of new objective form-based development standards, but to a lesser degree than the Proposed Project. Residential development facilitated by Alternative 2 would continue to be subject to the City's existing Municipal Code and General Plan policies to ensure consistency with regulations governing visual quality and character. As with the Proposed Project, residential development facilitated by Alternative 2 would not conflict with applicable zoning or other regulations governing scenic quality. Alternative 2's impacts would be similar compared to the Proposed Project and would remain less than significant.

Summary

Compared to the Proposed Project, Alternative 2 would result in reduced impacts related to scenic views and light and glare and similar impacts related to scenic highways and zoning conflicts. Overall, both Alternative 2 and Proposed Project would result in less than significant impacts to aesthetics, as shown in Table 6-1.

b. Air Quality

Alternative 2 would not increase densities in the areas identified as predominantly rowhouses and condominiums. Accordingly, Alternative 2 would result in less increase in vehicle trips and mobile emissions compared to the Proposed Project due to the decrease in maximum number of residents that could be added to Mountain View's population. However, similar to the Proposed Project, development under Alternative 2 would still occur within the context of broader regional growth, and any project-level reduction in vehicle activity would not eliminate cumulative increases in regional VMT and associated criteria air pollutant emissions. As with the Proposed Project, Alternative 2 would not conflict with the 2017 Clean Air Plan.

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Because Alternative 2 would not increase allowed residential density on parcels developed with rowhouses and condominiums, this alternative would involve less construction activity and less overall emissions of criteria air pollutants during construction. Individual residential development projects would be subject to Mitigation Measure AQ-1 requiring a quantitative analysis of individual projects exceeding the BAAQMD's screening criteria for criteria pollutant emissions and specifies emission reduction measures that shall be implemented if significance thresholds for criteria pollutants are exceeded. . While Alternative 2's project-level operational air quality impacts would be reduced compared to the Proposed Project and would remain less than significant, this Alternative would contribute to the same significant and unavoidable cumulative air quality impacts identified under AQ-C-1 of the Proposed Project.

Due to the reduction in construction emissions, this alternative also would result in lower overall emissions of toxic air contaminants during construction. Individual residential development projects would continue to be subject to Bay Area Air District regulations to minimize impacts associated with toxic air contaminants. Alternative 2 would also require implementation of mitigation measures AQ-2 and AQ-3 requiring health risk assessments for project-specific development within

1,000 feet of sensitive receptors and operational health risk assessments for project-specific development within 500 feet of a freeway, high volume roadway, railyard, or rail line using diesel locomotives. Because Alternative 2 would have less potential for development compared to the Proposed Project, impacts related to toxic air contaminants would be reduced compared to the Proposed Project but would remain less than significant with mitigation incorporated.

Similar to the Proposed Project, Alternative 2 would not include uses that generate substantial odorous emissions. Therefore, Alternative 2's impacts related to odors would be the same as the Proposed Project and would remain less than significant.

Summary

Compared to the Proposed Project, Alternative 2 would result in reduced impacts related to conflicts with the 2017 Clean Air Plan, air pollutant emissions, and toxic air contaminant emissions and similar impacts related to odors. However, Alternative 2 would not avoid the significant and unavoidable cumulative operational air quality impacts associated with long-term regional growth and cumulative increases in vehicle activity. Overall, both Alternative 2 and the Proposed Project would result in less than significant impacts with mitigation to air quality and cumulatively significant and unavoidable impacts to criteria pollutants, as shown in Table 6-1.

c. Biological Resources

Less residential development would be facilitated by Alternative 2 compared to the Proposed Project as Alternative 2 would not include density increases on parcels currently developed with rowhouses and condominiums. However, as Mountain View is a developed area, the density increases facilitated by the Proposed Project are anticipated to result in taller residential structures across similar sites as Alternative 2 rather than increased development footprints in undisturbed areas. Accordingly, development facilitated by Alternative 2 would result in slightly reduced ground-level disturbances compared to the Proposed Project and Alternative 2 would have a slightly reduced potential for impacts to special-status plant and wildlife species, riparian habitat, wetlands, and wildlife corridors compared to the Proposed Project. Individual residential projects facilitated by Alternative 2 would be subject to the same federal, state, and local regulations to minimize impacts to biological resources. As with the Proposed Project, Alternative 2 would include implementation of mitigation measures BIO-1, BIO-2, and BIO-3 to reduce potential impacts related to biological resources. Overall, Alternative 2 would have a slightly reduced impact on biological resources compared to the Proposed Project but impacts would remain less than significant with mitigation incorporated.

Summary

Compared to the Proposed Project, Alternative 2 would result in reduced impacts to biological resources. Overall, both Alternative 2 and the Proposed Project would result in less than significant impacts with mitigation to biological resources, as shown in Table 6-1.

d. Cultural Resources

As Mountain View is a developed area, the density increases facilitated by the Proposed Project are anticipated to result in taller residential structures across similar sites as Alternative 2 rather than increased development footprints in undisturbed areas. Accordingly, development facilitated by Alternative 2 would result in slightly reduced ground-level disturbances as the Proposed Project and Alternative 2 would have slightly reduced potential to facilitate residential development that could

adversely affect historical resources, archaeological resources, and human remains. As with the Proposed Project, development facilitated by Alternative 2 would result in a significant and unavoidable impact to historical resources, even with implementation of mitigation measures CUL-1a and CUL-1b. Similarly, development facilitated by Alternative 2 would also result in a significant and unavoidable impact to archaeological resources, even with implementation of mitigation measures CUL-2a and CUL-2b. As with the Proposed Project, development facilitated by Alternative 2 would occur in compliance with State Health and Safety Code Section 7050.5, 7051, and 7054 and Public Resources Code Section 5097.98 which sets forth procedures in the event of discovery of human remains and would ensure development facilitated by Alternative 2 would have a less than significant impact on human remains. Overall, Alternative 2's impact on cultural resources would be similar to those of the Proposed Project and impacts would remain less than significant with mitigation incorporated.

Summary

Compared to the Proposed Project, Alternative 2 would result in similar impacts to cultural resources. Overall, both Alternative 2 and the Proposed Project would result in less than significant impacts with mitigation to cultural resources, as shown in Table 6-1.

e. Geology and Soils

Alternative 2 would facilitate residential development in areas with the same geologic hazards as the residential development facilitated by the Proposed Project would experience. Development facilitated by Alternative 2 would be subject to the same regulations as residential development facilitated by the Proposed Project, including the CBC and policies within the City's General Plan Public Safety Element. Residential development would be designed in compliance with these regulations to ensure the risk of loss, injury, or death involving geologic hazards would be similar to the Proposed Project and would remain less than significant.

As Mountain View is a developed area, the density increases facilitated by the Proposed Project are anticipated to result in taller residential structures across similar sites as Alternative 2 rather than increased development footprints in undisturbed areas. Accordingly, development facilitated by Alternative 2 would result in slightly reduced ground-level disturbances compared to the Proposed Project and a corresponding minor reduction in the potential for substantial erosion. Development facilitated by Alternative 2 would occur in compliance with existing regulations such as erosion control standards administered by the San Francisco Bay RWQCB through the NPDES permit process to minimize erosion. Accordingly, Alternative 2's potential impacts to soil erosion would be similar to the Proposed Project and impacts would remain less than significant.

As with the Proposed Project, residential development facilitated by Alternative 2 would be connected to the local wastewater treatment system and no septic systems or alternative wastewater systems would be used.

Development facilitated by Alternative 2 would result in slightly reduced ground-level disturbances compared to the Proposed Project. As with the Proposed Project, development facilitated by Alternative 2 would occur in compliance with the Mountain View Standard COA for Discovery of Paleontological Resources and Mitigation Measure GEO-1 in the event of a fossil discovery during construction to ensure that construction is halted, and a qualified paleontologist assesses the find to determine its significance. Accordingly, Alternative 2 would have similar impacts to paleontological resources as the Proposed Project and impacts would remain less than significant with mitigation incorporated.

Summary

Compared to the Proposed Project, Alternative 2 would result in similar impacts to geology and soils. Overall, both Alternative 2 and the Proposed Project would result in less than significant impacts with mitigation to geology and soils, as shown in Table 6-1.

f. Greenhouse Gas Emissions

Less residential development would be facilitated by Alternative 2 compared to the Proposed Project, which would reduce project-generated emissions associated with building energy use and construction. However, Alternative 2 would also result in a slight increase in VMT compared to the Proposed Project due to land use patterns and reduced proximity of housing to services and employment centers. This increase in VMT could offset the reduced emissions associated with lower levels of new development, particularly where new development under the Proposed Project could incorporate more energy-efficient designs or all-electric construction. As with the Proposed Project, development facilitated by Alternative 2 could use natural gas which would be inconsistent with Bay Area Air District GHG threshold 1.a of prohibiting natural gas appliances or natural gas plumbing. Similar to the Proposed Project, Alternative 2 would still be unable to fully ban natural gas appliances or plumbing and would remain inconsistent with the 2022 Scoping Plan. Therefore, despite some reductions in development-related emissions, Alternative 2 would result in greenhouse gas emissions that are similar to the Proposed Project and would have a significant and unavoidable impact related to GHG emissions.

Summary

Compared to the Proposed Project, Alternative 2 would result in similar GHG emissions impacts. Overall, both Alternative 2 and Proposed Project would result in significant and unavoidable impacts to greenhouse gas emissions, as shown in Table 6-1.

g. Hazards and Hazardous Materials

Less residential development would be facilitated by Alternative 2 compared to the Proposed Project. Accordingly, Alternative 2 would result in less overall hazardous materials use for the construction (i.e., fuels, cleaners, solvents, etc.) and operation (i.e., household hazardous chemicals) compared to the Proposed Project. Alternative 2's potential impacts related to the use, transport, and storage of hazardous materials and accidental release would be minimized with compliance with existing federal, state, and local regulations related to the safe use of hazardous materials. Alternative 2's potential impacts related to the use, transport, and storage of hazardous materials and accidental release would be slightly reduced compared to the Proposed Project and impacts would remain less than significant.

Alternative 2 would not increase allowable density on parcels developed with rowhouses and condominiums; however, Alternative 2 could continue to facilitate residential development on these sites under existing allowed densities. There are listed hazardous material sites within the rowhouse and condominium areas of the R3 zone. As Alternative 2 would reduce development in these areas, Alternative 2 would reduce potential to result in impacts related to development on listed hazardous materials sites, which would be less than significant level with implementation of Mitigation Measure HAZ-1. Impacts would remain less than significant with mitigation incorporated.

Alternative 2 would facilitate residential development in the locations that are located outside of the safety and noise contours of the Moffett Federal Airfield, similar to the Proposed Project.

Therefore, Alternative 2 would have the same impact related to airport hazards as the Proposed Project.

Less residential development would be facilitated by Alternative 2 compared to the Proposed Project. Accordingly, Alternative 2 would have less potential to interfere with emergency response or evacuation compared to the Proposed Project. As with the Proposed Project, development facilitated by Alternative 2 would be subject to review by the City of Mountain View Police Department, MVFD, and EOC for compliance with adopted emergency response plans. Alternative 2's impacts related to emergency response and evacuation would be slightly reduced compared to the Proposed Project but would remain less than significant.

Alternative 2 would facilitate residential development in similar locations as the Proposed Project which are located outside of designated Fire Hazard Severity Zones. As with the Proposed Project, Alternative 2 would have no impact related to wildland fire.

Summary

Compared to the Proposed Project, Alternative 2 would result in reduced impacts related to hazardous materials handling, hazardous materials sites, and emergency response. Alternative 2 would result in similar impacts related to airport hazards and wildland fire as the Proposed Project. Overall, both Alternative 2 and the Proposed Project would result in less than significant impacts with mitigation to hazards and hazardous materials, as shown in Table 6-1.

h. Hydrology and Water Quality

Less residential development would be facilitated by Alternative 2 compared to the Proposed Project. Accordingly, Alternative 2 would have reduced potential to result in water quality degradation due to a reduction in overall construction activities compared to the Proposed Project. Development facilitated by Alternative 2 would occur in compliance with the same regulations as development facilitated by the Proposed Project, including the Construction Stormwater General Permit, Chapter 35 of the Mountain View Municipal Code, the Phase I MS4 Permit, and City of Mountain View stormwater requirements, which would minimize the potential for development to substantially degrade water quality, polluted runoff, or conflict with a water quality control plan. Therefore, Alternative 2 would slightly reduce the Proposed Project's impacts related to water quality degradation, polluted runoff, and conflicts with a water quality control plan, but impacts would remain less than significant.

Less residential development would be facilitated by Alternative 2 compared to the Proposed Project. Accordingly, Alternative 2 would result in less groundwater demand compared to the Proposed Project. As the Proposed Project would not substantially decrease groundwater supplies or interfere with sustainable groundwater management, Alternative 2's reduced groundwater use would also not substantially decrease groundwater supplies or interfere with sustainable groundwater management. Alternative 2's impact related to groundwater would be reduced compared to the Proposed Project but would remain less than significant.

Alternative 2 would facilitate development in similar locations as the Proposed Project; therefore, the development facilitated by Alternative 2 within the R3 Zoning District Update sites would not be located within a flood hazard and would not be subject to flood risk. As with the Proposed Project, Alternative 2 would have no impact related to flooding.

Summary

Compared to the Proposed Project, Alternative 2 would result in reduced impacts related to water quality degradation, polluted runoff, conflicts with a water quality control plan, and groundwater. Alternative 2 would result a similar impact related to flooding as the Proposed Project. Overall, both Alternative 2 and the Proposed Project would result in less than significant impacts to hydrology and water quality, as shown in Table 6-1.

i. Land Use and Planning

Alternative 2 would facilitate development in similar locations as the Proposed Project which are primarily infill parcels which would not physically divide established neighborhoods within Mountain View. As with the Proposed Project, Alternative 2 would not conflict with Plan Bay Area 2050, the City's General Plan, or the El Camino Real Precise Plan as Alternative 2 would facilitate residential development to meet the goals of these plans related to ensuring a sufficient housing supply is available. However, Alternative 2 would facilitate less housing than the Proposed Project. Therefore, Alternative 2 would support the Plan Bay Area 2050 and City policies for housing to a lesser extent than the Proposed Project. Alternative 2's impacts related to land use would be similar to the Proposed Project.

Summary

Compared to the Proposed Project, Alternative 2 would result in similar impacts related to land use. Overall, both Alternative 2 and Proposed Project would result in less than significant impacts to land use and planning, as shown in Table 6-1.

j. Noise

Less residential development would be facilitated by Alternative 2 compared to the Proposed Project. Accordingly, Alternative 2 would result in less overall construction noise and operational noise. As with the Proposed Project, residential development facilitated by Alternative 2 would be subject to the City's Standard COAs which would require the use of several noise reduction measures for construction and operation. Additionally, Alternative 2 would include Mitigation Measures NOI-1, which would require pile driving noise reduction measures to be implemented. Impacts related to construction noise and operational noise would be slightly reduced compared to the Proposed Project and remain less than significant with mitigation incorporated.

Less residential development would be facilitated by Alternative 2 compared to the Proposed Project. Accordingly, Alternative 2 would result in less overall groundborne vibration compared to the Proposed Project. As with the Proposed Project, Alternative 2 would include implementation of Mitigation Measure NOI-2, which would require pile driving vibration reduction measures to be implemented. Alternative 2's impacts related to groundborne vibration would be slightly reduced compared to the Proposed Project and would remain less than significant with mitigation incorporated.

Alternative 2 would facilitate residential development in similar locations as the Proposed Project which are located outside of the noise contours of the Moffett Federal Airfield. As with the Proposed Project, Alternative 2 would have no impact related to airport noise.

Summary

Compared to the Proposed Project, Alternative 2 would result in reduced construction noise, operational noise, and groundborne vibration impacts. Alternative 2 would result a similar impact related to airport noise as the Proposed Project. Overall, both Alternative 2 and the Proposed Project would result in less than significant impacts with mitigation to noise, as shown in Table 6-1.

k. Population and Housing

Less residential development would be facilitated by Alternative 2 compared to the Proposed Project. Accordingly, Alternative 2 would result in less population growth compared to the Proposed Project. As the Proposed Project's anticipated growth would be within the estimates and plans for growth beyond the horizon of the 2023-2031 Housing Element to accommodate for growth projected by the ABAG, Alternative 2's reduced growth would also be within these projections. Alternative 2's impact related to population growth would be slightly reduced compared to the Proposed Project but would remain less than significant.

As with the Proposed Project, Alternative 2 may facilitate redevelopment which could result in the displacement of residents; however, this loss would be offset by the residential units added during overall implementation of Alternative 2. Furthermore, existing state regulations would provide protection for tenants temporarily displaced which would minimize potential adverse impacts due to displacement. Alternative 2's potential impacts related to displacement would be similar to the Proposed Project and impacts would remain less than significant.

Summary

Compared to the Proposed Project, Alternative 2 would result in reduced impacts related to unplanned growth and similar impacts related to displacement. Overall, both Alternative 2 and Proposed Project would result in less than significant impacts population and housing, as shown in Table 6-1.

l. Public Services and Recreation

Less residential development would be facilitated by Alternative 2 compared to the Proposed Project. Accordingly, Alternative 2 would result in less demand for fire, police, school, parks, or other public facilities compared to the Proposed Project, and would result in slower deterioration of existing recreational facilities compared to the Proposed Project. Accordingly, the reduced growth associated with Alternative 2 would also result in a slightly reduced impacts on public services and recreation compared to the Proposed Project but impacts would remain less than significant.

Summary

Compared to the Proposed Project, Alternative 2 would result in reduced impacts related to public services and recreation. Overall, both Alternative 2 and Proposed Project would result in less than significant impacts to public services and recreation, as shown in Table 6-1.

m. Transportation

Less residential development would be facilitated by Alternative 2 compared to the Proposed Project. As with the Proposed Project, Alternative 2 would not include physical changes to existing roadway, transit, bicycle, or pedestrian facilities and would not interfere with implementation of projects outlined in the Plan Bay Area 2050, the Santa Clara County Congestion Management Program, Valley Transportation Plan 2040 Plan, the Countywide Bicycle Plan, the City's General Plan, the Mountain View Pedestrian Master Plan, or VTA's pedestrian improvement strategies. Alternative 2's impacts related to conflicts with a transportation plan, program, ordinance, or policy would remain less than significant, the same as the Proposed Project.

Less residential development would be facilitated by Alternative 2 compared to the Proposed Project. As a result, Alternative 2 would result in less VMT per capita reductions compared to the Proposed Project due to the reductions in high density housing that would be permitted under the Proposed Project. However, given that Alternative 2 would include some permitted residential density, Alternative 2 is anticipated to result in some reductions in VMT per capita. Alternative 2's overall contribution to cumulative regional VMT increases would be reduced compared to the Proposed Project. Alternative 2 would result in less development compared to the Proposed Project which would slightly lessen, but not eliminate, the Project's significant and unavoidable cumulative impacts to regional VMT contribution to cumulative VMT growth. However, ultimately Alternative 2 would contribute to regional growth and vehicle emissions, resulting in significant and unavoidable cumulative impacts, similar to the Proposed Project. Accordingly, Alternative 2 would have greater impacts related to VMT compared to the Proposed Project, but this impact would remain less than significant.

As with the Proposed Project, individual developments facilitated by Alternative 2 would be required to be designed in accordance with the standards for vehicle ingress/egress and emergency access set forth within Chapter 14, Article 1 of the City's Municipal Code and the standards of the Mountain View Fire Department. These standards, and review of individual projects from the City and the Mountain View Fire Department would ensure such developments would minimize geometric hazards and provide adequate ingress/egress for emergency access. Accordingly, Alternative 2 would have similar impacts related to geometric hazards and emergency access as the Proposed Project which would remain less than significant.

Summary

Compared to the Proposed Project, Alternative 2 would result in increased impacts related to VMT and similar impacts related to conflicts with transportation policies, geometric hazards, and emergency access. Overall, both Alternative 2 and Proposed Project would result in less than significant impacts to transportation, as shown in Table 6-1.

n. Tribal Cultural Resources

Assembly Bill 52 and Senate Bill 18 consultation carried out as part of the Proposed Project has not identified known tribal cultural resources within the project area. Accordingly, Alternative 2, which would facilitate development in similar areas as the Proposed Project, would not have potential to impact known tribal cultural resources. As with the Proposed Project, individual developments facilitated by Alternative 2 would undergo site-specific review in accordance with Assembly Bill 52 and Senate Bill 35 which would require project-specific tribal cultural resource identification and consultation, and the appropriate avoidance, minimization, or mitigation would be incorporated. In addition, Alternative 2 would include implementation of Mitigation Measure TCR-1 requiring suspension of work around potential tribal cultural resources. Therefore, Alternative 2 would have similar impacts to tribal cultural resources as the Proposed Project, which would remain less than significant with mitigation incorporated.

Summary

Compared to the Proposed Project, Alternative 2 would result in similar impacts to tribal cultural resources. Overall, both Alternative 2 and the Proposed Project would result in less than significant impacts with mitigation to tribal cultural resources, as shown in Table 6-1.

o. Utilities and Service Systems

Alternative 2 would result in slightly less residential development compared to the Proposed Project. Accordingly, Alternative 2 would result in a modest decreases to water demand, wastewater generation, solid waste generation, and electricity, natural gas, and telecommunication infrastructure demand. As the Proposed Project would not result in water demand in excess of existing City supplies, wastewater generation exceeding Mountain View's capacity allocation of the Palo Alto Regional Water Quality Control Plant, solid waste exceeding Kirby Canyon Recycling and Disposal Facility capacity, or result in substantial stormwater, electricity, natural gas, and telecommunication infrastructure demand, Alternative 2's reduced development would also not result in substantial utility demands. Accordingly, Alternative 2 would result in reduced impacts on utilities and service systems to the Proposed Project and would remain less than significant.

Summary

Compared to the Proposed Project, Alternative 2 would result in reduced impacts to utilities and service systems. Overall, both Alternative 2 and Proposed Project would result in less than significant impacts to utilities and service systems, as shown in Table 6-1.

6.3.3 Alternative 3: Lower-Density Across All Change Areas

a. Aesthetics

Alternative 3 would apply a single zoning designation at 50-75 units per acre across all change areas identified in the Proposed Project. Accordingly, Alternative 3 would facilitate the development of fewer units compared to the Proposed Project. Due to the reduced residential development anticipated to be facilitated by Alternative 3, Alternative 3 would have reduced potential to result in adverse impacts to scenic vistas or introduce substantial light and glare compared to the Proposed Project. Residential development facilitated by Alternative 3 would be required to adhere to existing City Municipal Code, including Section 8.242, and General Plan policies, including Policy 9.5 and Policy LUD-9.6, which would ensure residential development would minimize potential adverse impacts associated with blocking scenic vistas or introducing substantial light and glare on an individual project site. Accordingly, Alternative 3's impacts related to scenic vistas and light and glare would be reduced compared to the Proposed Project but would remain less than significant.

As with the Proposed Project, Alternative 3 would not occur within the vicinity of a designated state scenic highway and no impact would occur.

Alternative 3 would include implementation of new objective form-based development standards, but to a lesser degree than the Proposed Project due to the lower-density zoning designations. Residential development facilitated by Alternative 3 would continue to be subject to the City's existing Municipal Code and General Plan policies to ensure consistency with regulations governing visual quality and character. As with the Proposed Project, residential development facilitated by Alternative 3 would not conflict with applicable zoning or other regulations governing scenic quality. Alternative 3's impacts would be reduced compared to the Proposed Project but would remain less than significant.

Summary

Compared to the Proposed Project, Alternative 3 would result in reduced impacts related to scenic views, light and glare, and zoning conflicts and similar impacts related to scenic highways. Overall,

both Alternative 3 and Proposed Project would result in less than significant impacts to aesthetics, as shown in Table 6-1.

b. Air Quality

Alternative 3 would apply a single zoning designation at 50-75 units per acre across all of the change areas identified in the Proposed Project. Accordingly, Alternative 3 would result in less increases in vehicle trips and mobile emissions compared to the Proposed Project due to the decrease in maximum number of residents that could be added to Mountain View's population. However, similar to the Proposed Project, development under Alternative 3 would still occur within the context of broader regional growth, and any project-level reduction in vehicle activity would not eliminate cumulative increases in regional VMT and associated criteria air pollutant emissions. As with the Proposed Project, Alternative 3 would not conflict with the 2017 Clean Air Plan.

Because Alternative 3 would apply a single zoning designation at 50-75 units per acre across all of the change areas identified in the Proposed Project, this alternative would involve less construction activity and less overall emissions of criteria air pollutants during construction. Individual residential development projects would be subject to Mitigation Measure AQ-1 requiring a quantitative analysis of individual projects exceeding the BAAQMD's screening criteria for criteria pollutant emissions and specifies emission reduction measures that shall be implemented if significance thresholds for criteria pollutants are exceeded. While Alternative 3's project-level operational air quality impacts would be reduced compared to the Proposed Project and would remain less than significant, this Alternative would contribute to the same significant and unavoidable cumulative air quality impacts identified under AQ-C-1 of the Proposed Project.

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Due to the reduction in construction emissions, Alternative 3 also would result in lower overall emissions of toxic air contaminants during construction. Individual residential development projects would continue to be subject to Bay Area Air District regulations to minimize impacts associated with toxic air contaminants. Alternative 3 would also require implementation of Mitigation Measures AQ-2 and AQ-3 requiring construction health risk assessments for project-specific development within 1,000 feet of sensitive receptors and operational health risk assessments for project-specific development within 500 feet of a freeway, high volume roadway, railyard, or rail line using diesel locomotives. Because Alternative 3 would have less potential for development compared to the Proposed Project, impacts related to toxic air contaminants would be reduced compared to the Proposed Project but would remain less than significant with mitigation incorporated.

Similar to the Proposed Project, Alternative 3 would not include uses that generate substantial odorous emissions. Therefore, Alternative 3's impacts related to odors would be the same as the Proposed Project and would remain less than significant.

Summary

Compared to the Proposed Project, Alternative 3 would result in reduced impacts related to conflicts with the 2017 Clean Air Plan, air pollutant emissions, and toxic air contaminant emissions and similar impacts related to odors. However, Alternative 2 would not avoid the significant and unavoidable cumulative operational air quality impacts associated with long-term regional growth and cumulative increases in vehicle activity. Overall, both Alternative 3 and the Proposed Project

would result in less than significant impacts with mitigation to air quality and cumulatively significant and unavoidable impacts to criteria pollutants, as shown in Table 6-1.

c. Biological Resources

Alternative 3 would apply a single zoning designation at 50-75 units per acre across all of the change areas identified in the Proposed Project. Accordingly, Alternative 3 would facilitate the development of fewer units compared to the Proposed Project. However, as Mountain View is a developed area, the density increases facilitated by the Proposed Project are anticipated to result in taller residential structures across similar sites compared to Alternative 3 rather than increased development footprints in undisturbed areas. Accordingly, development facilitated by Alternative 3 would result in similar ground-level disturbances as the Proposed Project. Therefore, Alternative 3 would result in a similar potential for impacts to special-status plant and wildlife species, riparian habitat, wetlands, and wildlife corridors compared to the Proposed Project. Individual residential projects facilitated by Alternative 3 would be subject to the same federal, state, and local regulations to minimize impacts to biological resources. As with the Proposed Project, Alternative 3 would include implementation of mitigation measures BIO-1, BIO-2, and BIO-3 to reduce potential impacts related to biological resources. Overall, Alternative 3 would have a similar impact on biological resources compared to the Proposed Project and the level of impact would remain less than significant with mitigation incorporated.

Summary

Compared to the Proposed Project, Alternative 3 would result in similar impacts to biological resources. Overall, both Alternative 3 and the Proposed Project would result in less than significant impacts with mitigation to biological resources, as shown in Table 6-1.

d. Cultural Resources

As Mountain View is a developed area, the density increases facilitated by the Proposed Project are anticipated to result in taller residential structures across similar sites as Alternative 3 rather than increased development footprints in undisturbed areas. Accordingly, development facilitated by Alternative 3 would result in similar ground-level disturbances as the Proposed Project. Alternative 3 would have similar potential as the Proposed Project to facilitate residential development that could adversely affect historical resources, archaeological resources, and human remains. As with the Proposed Project, development facilitated by Alternative 3 would result in a significant and unavoidable impact to historical resources, even with implementation of mitigation measures CUL-1a and CUL-1b. Similarly, development facilitated by Alternative 3 would also result in a significant and unavoidable impact to archaeological resources, even with implementation of Mitigation Measures CUL-2a and CUL-2b]. As with the Proposed Project, development facilitated by Alternative 3 would occur in compliance with State Health and Safety Code Section 7050.5, 7051, and 7054 and Public Resources Code Section 5097.98 which sets forth procedures in the event of discovery of human remains and would ensure development facilitated by Alternative 3 would have a less than significant impact on human remains. Overall, Alternative 3's impact on cultural resources would be similar to the Proposed Project but would remain less than significant.

Summary

Compared to the Proposed Project, Alternative 3 would result in similar impacts to cultural resources. Overall, both Alternative 3 and the Proposed Project would result in significant and unavoidable impacts to cultural resources, as shown in Table 6-1.

e. Geology and Soils

Alternative 3 would facilitate residential development in areas with the same geologic hazards as the residential development facilitated by the Proposed Project would experience. Development facilitated by Alternative 3 would be subject to the same regulations as residential development facilitated by the Proposed Project, including the CBC and policies within the City's General Plan Public Safety Element. Residential development would be designed in compliance with these regulations to ensure the risk of loss, injury, or death involving geologic hazards would be similar to the Proposed Project and would remain less than significant.

As Mountain View is a developed area, the density increases facilitated by the Proposed Project are anticipated to result in taller residential structures across similar sites as Alternative 3 rather than increased development footprints in undisturbed areas. Accordingly, development facilitated by Alternative 3 would result in similar ground-level disturbances as the Proposed Project. Development facilitated by Alternative 3 would occur in compliance with existing regulations such as erosion control standards administered by the San Francisco Bay RWQCB through the NPDES permit process to minimize erosion. Accordingly, Alternative 3's potential impacts to soil erosion would be similar to the Proposed Project and would remain less than significant.

As with the Proposed Project, residential development facilitated by Alternative 3 would be connected to the local wastewater treatment system and no septic systems or alternative wastewater systems would be used. Therefore, Alternative 3 would be similar to the Proposed Project.

However, as Mountain View is a developed area, the density increases facilitated by the Proposed Project are anticipated to result in taller residential structures across similar sites as Alternative 3 rather than increased development footprints in undisturbed areas. Accordingly, development facilitated by Alternative 3 would result in similar ground-level disturbances as the Proposed Project. As with the Proposed Project, development facilitated by Alternative 3 would occur in compliance with the Mountain View Standard COA for Discovery of Paleontological Resources and Mitigation Measure GEO-1 in the event of a fossil discovery during construction to ensure that construction is halted, and a qualified paleontologist assesses the find to determine its significance. Accordingly, Alternative 3 would have similar impacts to paleontological resources as the Proposed Project and would remain less than significant with mitigation incorporated.

Summary

Compared to the Proposed Project, Alternative 3 would result in similar impacts to geology and soils. Overall, both Alternative 3 and the Proposed Project would result in less than significant impacts with mitigation to geology and soils, as shown in Table 6-1.

f. Greenhouse Gas Emissions

Alternative 3 would facilitate the development of fewer units compared to the Proposed Project, which would reduce project-generated emissions associated with building energy use and construction. However, Alternative 2 would also result in a slight increase in VMT compared to the

Proposed Project due to land use patterns and reduced proximity of housing to services and employment centers. This increase in VMT could offset the reduced emissions associated with lower levels of new development, particularly where new development under the Proposed Project could incorporate more energy-efficient designs or all-electric construction. As with the Proposed Project, development facilitated by Alternative 3 could use natural gas which would be inconsistent with Bay Area Air District GHG threshold 1.a of prohibiting natural gas appliances or natural gas plumbing. Similar to the Proposed Project, Alternative 3 would still be unable to fully ban natural gas appliances or plumbing and would remain inconsistent with the 2022 Scoping Plan. Therefore, despite some reductions in development-related emissions, Alternative 2 would result in greenhouse gas emissions that are similar to the Proposed Project and would have a significant and unavoidable impact related to GHG emissions.

Summary

Compared to the Proposed Project, Alternative 3 would result in similar GHG emissions impacts. Overall, both the Alternative 3 and the Proposed Project would result in significant and unavoidable impacts to greenhouse gas emissions, as shown in Table 6-1.

g. Hazards and Hazardous Materials

Alternative 3 would facilitate the development of fewer units compared to the Proposed Project. Accordingly, Alternative 3 would result in less overall hazardous materials use for the construction (i.e., fuels, cleaners, solvents, etc.) and operation (i.e., household hazardous chemicals) compared to the Proposed Project. Alternative 3's potential impacts related to the use, transport, and storage of hazardous materials and accidental release would be minimized with compliance with existing federal, state, and local regulations related to the safe use of hazardous materials. Alternative 3's potential impacts related to the use, transport, and storage of hazardous materials and accidental release would be reduced compared to the Proposed Project but would remain less than significant.

Alternative 3 would facilitate residential development on the same sites as the Proposed Project. Accordingly, Alternative 3 would have the same potential to result in impacts related to development on listed hazardous materials sites, which would be reduced to a less than significant level with implementation of Mitigation Measure HAZ-1. Therefore, impacts under Alternative 3 would be similar to the Proposed Project and would remain less than significant with mitigation incorporated.

Alternative 3 would facilitate residential development in the same locations as the Proposed Project which are located outside of the safety and noise contours of the Moffett Federal Airfield, similar to the Proposed Project. Therefore, Alternative 3 would have the same impact related to airport hazards as the Proposed Project, which would remain less than significant.

Alternative 3 would facilitate the development of fewer units compared to the Proposed Project. Accordingly, Alternative 3 would have less potential to interfere with emergency response or evacuation compared to the Proposed Project. As with the Proposed Project, development facilitated by Alternative 3 would be subject to review by the City of Mountain View Police Department, MVFD, and EOC for compliance with adopted emergency response plans. Alternative 3's impacts related to emergency response and evacuation would be reduced compared to the Proposed Project but would remain less than significant.

Alternative 3 would facilitate residential development in similar locations as the Proposed Project which are located outside of designated Fire Hazard Severity Zones. As with the Proposed Project, Alternative 3 would have no impact related to wildland fire.

Summary

Compared to the Proposed Project, Alternative 3 would result in reduced impacts related to hazardous materials handling and emergency response. Alternative 3 would result in similar impacts related to hazardous materials sites, airport hazards, and wildland fire as the Proposed Project. Overall, both Alternative 3 and the Proposed Project would result in less than significant impacts with mitigation to hazards and hazardous materials, as shown in Table 6-1.

h. Hydrology and Water Quality

Alternative 3 would facilitate the development of fewer units compared to the Proposed Project. Accordingly, Alternative 3 would have reduced potential to result in water quality degradation due to a reduction in overall construction activities compared to the Proposed Project. Development facilitated by Alternative 3 would occur in compliance with the same regulations as development facilitated by the Proposed Project, including the Construction Stormwater General Permit, Chapter 35 of the Mountain View Municipal Code, the Phase I MS4 Permit, and City of Mountain View stormwater requirements, which would minimize the potential for development to substantially degrade water quality, polluted runoff, or conflict with a water quality control plan. Therefore, Alternative 3 would reduce the Proposed Project's impacts related to water quality degradation, polluted runoff, and conflicts with a water quality control plan but impacts would remain less than significant.

Alternative 3 would facilitate the development of fewer units compared to the Proposed Project. Accordingly, Alternative 3 would result in less groundwater demand compared to the Proposed Project. As the Proposed Project would not substantially decrease groundwater supplies or interfere with sustainable groundwater management, Alternative 3's reduced groundwater use would also not substantially decrease groundwater supplies or interfere with sustainable groundwater management. Alternative 3's impact related to groundwater would be reduced compared to the Proposed Project but would remain less than significant.

Alternative 3 would facilitate development at the same locations as the Proposed Project; therefore, the development facilitated by Alternative 3 within the R3 Zoning District Update sites would not be located within a flood hazard and would not be subject to flood risk. As with the Proposed Project, Alternative 3 would have no impact related to flooding.

Summary

Compared to the Proposed Project, Alternative 3 would result in reduced impacts related to water quality degradation, polluted runoff, conflicts with a water quality control plan, and groundwater. Alternative 3 would result a similar impact related to flooding as the Proposed Project. Overall, both Alternative 3 and the Proposed Project would result in less than significant impacts to hydrology and water quality, as shown in Table 6-1.

i. Land Use and Planning

Alternative 3 would facilitate development at the same locations as the Proposed Project which are primarily infill parcels which would not physically divide established neighborhoods within Mountain

View. As with the Proposed Project, Alternative 3 would not conflict with Plan Bay Area 2050, the City's General Plan, or the El Camino Real Precise Plan as Alternative 3 would facilitate residential development to meet the goals of these plans related to ensuring a sufficient housing supply is available. However, Alternative 3 would facilitate less housing than the Proposed Project. Therefore, Alternative 3 would support the Plan Bay Area 2050 and City policies for housing to a lesser extent compared to the Proposed Project. Alternative 3's impacts related to land use would be similar to the Proposed Project and would remain less than significant.

Summary

Compared to the Proposed Project, Alternative 3 would result in similar impacts related to land use. Overall, both Alternative 3 and Proposed Project would result in less than significant impacts to land use and planning, as shown in Table 6-1.

j. Noise

Alternative 3 would facilitate the development of fewer units compared to the Proposed Project. Accordingly, Alternative 3 would result in less overall construction noise and operational noise compared to the Proposed Project. As with the Proposed Project, residential development facilitated by Alternative 3 would be subject to the City's Standard COAs which would require the use of several noise reduction measures for construction and operation. Additionally, Alternative 3 would include Mitigation Measures NOI-1, which would require pile driving noise reduction measures to be implemented. Impacts related to construction noise and operational noise would be slightly reduced compared to the Proposed Project and remain less than significant with mitigation incorporated.

Alternative 3 would facilitate the development of fewer units compared to the Proposed Project. Accordingly, Alternative 3 would result in less overall groundborne vibration compared to the Proposed Project. As with the Proposed Project, Alternative 3 would include implementation of Mitigation Measure NOI-1 for the use of piling driving proximate to sensitive receptors. Alternative 3's impacts related to groundborne vibration would be reduced compared to the Proposed Project.

Alternative 3 would facilitate residential development in similar locations as the Proposed Project which are located outside of the noise contours of the Moffett Federal Airfield. As with the Proposed Project, Alternative 3 would have no impact related to airport noise.

Summary

Compared to the Proposed Project, Alternative 3 would result in reduced construction noise, operational noise, and groundborne vibration impacts. Alternative 3 would result a similar impact related to airport noise as the Proposed Project. Overall, both Alternative 3 and the Proposed Project would result in less than significant impacts with mitigation to noise, as shown in Table 6-1.

k. Population and Housing

Alternative 3 would facilitate the development of fewer units compared to the Proposed Project. Accordingly, Alternative 3 would result in less population growth compared to the Proposed Project. As the Proposed Project's anticipated growth would be within the estimates and plans for growth beyond the horizon of the 2023-2031 Housing Element to accommodate for growth projected by the ABAG, Alternative 3's reduced growth would also be within these projections. Alternative 3's

impact related to population growth would be reduced compared to the Proposed Project but would remain less than significant.

As with the Proposed Project, Alternative 3 may facilitate redevelopment which could result in the displacement of residents; however, this loss would be offset by the residential units added during overall implementation of Alternative 3. Furthermore, existing state regulations would provide protection for tenants temporarily displaced which would minimize potential adverse impacts due to displacement. Although Alternative 3 would facilitate the development of fewer units compared to the Proposed Project, Alternative 3's potential impacts related to displacement would be similar to the Proposed Project and would remain less than significant.

Summary

Compared to the Proposed Project, Alternative 3 would result in reduced impacts related to unplanned growth and similar impacts related to displacement. Overall, both Alternative 3 and Proposed Project would result in less than significant impacts to population and housing, as shown in Table 6-1.

l. Public Services and Recreation

Alternative 3 would facilitate the development of fewer units compared to the Proposed Project. Accordingly, Alternative 3 would result in less demand for fire, police, school, parks, or other public facilities compared to the Proposed Project, and would result in slower deterioration of existing recreational facilities compared to the Proposed Project. As the Proposed Project's growth would result in a less than significant impact on public services and recreation, the reduced growth associated with Alternative 3 would also result in reduced impacts compared to the Proposed Project, but those impacts would remain less than significant.

Summary

Compared to the Proposed Project, Alternative 3 would result in reduced impacts related to public service and recreation. Overall, both Alternative 3 and Proposed Project would result in less than significant impacts to public services and recreation, as shown in Table 6-1.

m. Transportation

Alternative 3 would facilitate the development of fewer units compared to the Proposed Project. As with the Proposed Project, Alternative 3 would not include physical changes to existing roadway, transit, bicycle, or pedestrian facilities and would not interfere with implementation of projects outlined in the Plan Bay Area 2050, the Santa Clara County Congestion Management Program, Valley Transportation Plan 2040 Plan, the Countywide Bicycle Plan, the City's General Plan, the Mountain View Pedestrian Master Plan, or VTA's pedestrian improvement strategies. Alternative 3's impacts related to conflicts with a transportation plan, program, ordinance, or policy would remain less than significant, the same as the Proposed Project.

Alternative 3 would facilitate the development of fewer units compared to the Proposed Project. As a result, Alternative 3 would result in less VMT per capita reductions compared to the Proposed Project due to fewer high-density housing units that would be permitted under the Proposed Project. However, given that Alternative 3 would include some permitted residential density, Alternative 3 is anticipated to result in some reductions in VMT per capita. Alternative 3's overall contribution to cumulative regional VMT increases would be reduced compared to the Proposed Project. Alternative 3 would result in less development compared to the Proposed Project which

would slightly lessen, but not eliminate, the Project's significant and unavoidable cumulative impacts to regional VMT contribution to cumulative VMT growth. However, ultimately Alternative 3 would contribute to regional growth and vehicle emissions, resulting in significant and unavoidable cumulative impacts, similar to the Proposed Project. Accordingly, Alternative 3 would have greater impacts related to VMT compared to the Proposed Project but would remain less than significant.

As with the Proposed Project, individual developments facilitated by Alternative 3 would be required to be designed in accordance with the standards for vehicle ingress/egress and emergency access set forth within Chapter 14, Article 1 of the City's Municipal Code and the standards of the Mountain View Fire Department. These standards, and review of individual projects from the City and the Mountain View Fire Department would ensure such developments would minimize geometric hazards and provide adequate ingress/egress for emergency access. Accordingly, Alternative 3 would have similar impacts related to geometric hazards and emergency access as the Proposed Project which would remain less than significant.

Summary

Compared to the Proposed Project, Alternative 3 would result in increased impacts related to VMT and similar impacts related to conflicts with transportation policies, geometric hazards, and emergency access. Overall, both Alternative 3 and Proposed Project would result in less than significant impacts to transportation, as shown in Table 6-1.

n. Tribal Cultural Resources

Assembly Bill 52 and Senate Bill 18 consultation carried out as part of the Proposed Project has not identified known tribal cultural resources within the project area. Accordingly, Alternative 3, which would facilitate development in the same locations as the Proposed Project, would not have potential to impact known tribal cultural resources. As with the Proposed Project, individual developments facilitated by Alternative 3 would undergo site-specific review in accordance with Assembly Bill 52 and Senate Bill 35 which would require project-specific tribal cultural resource identification and consultation, and the appropriate avoidance, minimization, or mitigation would be incorporated. In addition, Alternative 3 would include implementation of Mitigation Measure TCR-1 requiring suspension of work around potential tribal cultural resources. Therefore, Alternative 3 would have similar impacts to tribal cultural resources as the Proposed Project which would remain less than significant with mitigation incorporated.

Summary

Compared to the Proposed Project, Alternative 3 would result in similar impacts to tribal cultural resources. Overall, both Alternative 3 and the Proposed Project would result in less than significant impacts with mitigation to tribal cultural resources, as shown in Table 6-1.

o. Utilities and Service Systems

Alternative 3 would facilitate the development of fewer units compared to the Proposed Project. Accordingly, Alternative 3 would decrease water demand, wastewater generation, solid waste generation, and electricity, natural gas, and telecommunication infrastructure demand compared to the Proposed Project. As the Proposed Project would not result in water demand in excess of existing City supplies, wastewater generation exceeding Mountain View's capacity allocation of the Palo Alto Regional Water Quality Control Plant, solid waste exceeding Kirby Canyon Recycling and Disposal Facility capacity, or result in substantial stormwater, electricity, natural gas, and

telecommunication infrastructure demand, Alternative 3's reduced development would also not result in substantial utility demands. Furthermore, because Alternative 3 yields a smaller residential capacity and supports more gradual physical change across the plan area, its potential to obstruct or burden to utilities would be reduced relative to the Proposed Project. Accordingly, Alternative 3 would have a reduced impact on utilities and service systems compared to the Proposed Project and would remain less than significant.

Summary

Compared to the Proposed Project, Alternative 3 would result in reduced impacts to utilities and service systems. Overall, both Alternative 3 and the Proposed Project would result in less than significant impacts to utilities and service systems, as shown in Table 6-1.

6.4 Environmentally Superior Alternative

CEQA requires the identification of an environmentally superior alternative among the alternatives evaluated in an EIR. The CEQA Guidelines do not define a specific methodology for determining the environmentally superior alternative. For the purposes of this analysis, the project alternatives have been compared within each issue area to the Proposed Project, and a determination has been made as to whether the potential environmental effects of each alternative would be reduced, increased, or is similar in comparison to the Proposed Project (refer to Table 6-1).

Based on the analysis above, Alternative 2 and Alternative 3 would result in reduced impacts compared to the Proposed Project for most environmental issue areas. These alternatives would each involve a reduction in overall housing capacity compared to the Proposed Project, and therefore would facilitate less development activities compared to the Proposed Project. Alternative 2 and Alternative 3 would not reduce the Proposed Project's significant and unavoidable GHG emissions impacts and would each result in greater impacts related to VMT, as these impacts would include less residential density than the Proposed Project, although VMT impacts would remain less than significant.

As shown in Table 6-1, Alternative 2 would be the environmentally superior alternative. Alternative 2 would result in the greatest reductions in potential impacts related to density, construction activity, and ground disturbance, such as aesthetics, air quality, biological resources, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services and recreation, and utilities and service systems.

Although Alternative 2 is considered the environmentally superior alternative, Alternative 2 would partially meet the following objectives, but not to the same degree as the Proposed Project, as these objectives relate to introducing higher-density housing to Mountain View:

- Create opportunities for diverse unit types, including middle-income ownership and stacked flats.
- Update the R3 Zoning District to be consistent with state law and the General Plan while addressing Housing Element programs and improving development review.
- Use density change in targeted areas to achieve desired goals, implement changes to large-parcel areas rather than small, and increase the supply of housing.
- Encourage parcel aggregation.

Table 6-1 Overall Impact Comparison of Alternatives

Issue	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: No Change in Rowhouse and Condominium Areas	Alternative 3: Lower-Density Alternative Across All Change Areas
Aesthetics	LTS	+	+	+
Air Quality	LTSM	+	+	+
Biological Resources	LTSM	+	+	=
Cultural Resources	LTSM	+	=	=
Geology and Soils	LTSM	+	=	=
Greenhouse Gas Emissions	SU	-	=	=
Hazards and Hazardous Materials	LTSM	+	+	+
Hydrology and Water Quality	LTS	+	+	+
Land Use and Planning	LTS	+	=	=
Noise	LTSM	+	+	+
Population and Housing	LTS	+	+	+
Public Services and Recreation	LTS	+	+	+
Transportation	LTS	-	-	-
Tribal Cultural Resources	LTSM	+	=	=
Utilities and Service Systems	LTS	+	+	+
Total		2 – 13 + 0 =	1 – 9 + 5 =	1 – 8 + 6 =

NI = No Impact; LTS = Less than Significant; LTSM = Less than Significant with Mitigation; SU = Significant and Unavoidable

+ Superior to the Proposed Project (reduced level of impact)

- Inferior to the Proposed Project (increased level of impact)

= Similar level of impact to the Proposed Project

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