

R3 Zoning District Update

Draft Environmental Impact Report

APPENDICES

SCH # 2025070500

prepared by

The City of Mountain View
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RINCON CONSULTANTS

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Appendix A

NOP and Responses

Sunnyvale

August 6, 2025

Eric Anderson
City of Mountain View Community Development Department
500 Castro Street, PO Box 7459
Mountain View, California 94039

Re: Comments on The R3 Zoning District Update Project Notice of Preparation of an Environmental Impact Report

Dear Eric,

Thank you for allowing the City of Sunnyvale to provide comments on the R3 Zoning District Update Project Notice of Preparation (NOP) of an Environmental Impact Report. Comments concerning Transportation related to the project are as follows:

1. Based on the expected number of residential units that would result from the project at full buildout, we believe that this project will trigger a Congestion Management Program (CMP) requirement and a Transportation Analysis (TA) would be required. The City of Sunnyvale would like to review the scope for the TA.

2. Although intersection level of service is no longer a CEQA requirement, the City of Sunnyvale requests the City of Mountain View to evaluate intersections operationally in Sunnyvale using criteria per the VTA TA Guidelines and the Transportation Operations Analysis (TOA) Guidelines as a basis. Accordingly, the City of Sunnyvale and CMP intersections with ten or more project trips per lane added to any intersection movement should be analyzed. Due to the project size and location, it is expected that project trips would travel to the east and south through Sunnyvale, which is likely to trigger the need for intersection analysis along Moffett Park Drive, Maude Avenue, Mary Avenue, Evelyn Avenue, Bernardo Avenue, El Camino Real, Heatherstone Way, etc. Please include intersections within the City of Sunnyvale that would meet the analysis threshold of ten or more project trips per lane.

   Traffic conditions at the study intersections are typically conducted during the AM (7-10) and PM (4-7) peak hours under existing, background, and cumulative analysis scenarios.

3. A corridor analysis should be considered for El Camino Real, Maude Avenue, and Evelyn Avenue.

4. Relevant approved projects within the City of Sunnyvale and other neighboring jurisdictions need to be included in the study estimates of the background traffic volumes. This is consistent with the CMP TA Guidelines. Similarly, pending

projects and/or the application of an annual growth rate need to be incorporated in the Cumulative traffic volume estimates in order to reflect the growth in both the local and regional traffic. A current list of approved and pending development projects in the City of Sunnyvale can be supplied upon request.

5. Evaluation of the alternative modes of transportation should be included in this project's traffic analysis. The VTA CMP Guidelines indicate that traffic analysis must include transit facilities in terms of transit service availability, transit capacity relative to the increased demand, impact of increased traffic delays on the service, and the need for transit access improvements. According to the CMP Guidelines, the traffic analysis must also evaluate bicycle and pedestrian facilities in terms of their availability, project effects on future bike/pedestrian plans, and improvements proposed by the project. Maps and information on existing and planned bicycle facilities within Sunnyvale can be supplied upon request.

6. The TA should identify the existing, background, and cumulative project operational effects on Sunnyvale facilities, along with associated feasible improvements. It is important to also include the project's full/pro-rata share of financial contributions towards the implementation of these improvements to bring the roadways back to acceptable or no-project operational level of service. Please discuss the identification of improvements with the City of Sunnyvale prior to finalizing the report.

7. Truck routes and construction-related activity impacts on the City of Sunnyvale and regional corridors need to be investigated and mitigated if necessary.

8. The Valley Transportation Plan (VTP) on the VTA website contains a list of regional improvements that should be included in the cumulative conditions. Similarly, local improvements within the City of Sunnyvale that are already identified in the City's Capital Improvement Program (CIP) and/or in the Sunnyvale Traffic Impact Fee Study shall be included in the cumulative analysis. When utilizing regional and local road improvements as project mitigations, please clarify the construction schedule of these improvements relative to the schedule of the development completion.

9. The proposed project is significant in size and is expected to affect the Sunnyvale street system. Following the CMP guidelines, the City of Sunnyvale is requesting to review the draft TA report.

10. Operation effects to County of Santa Clara facilities should be improved based on projects listed in the County Expressway Planning Study.

Please do not hesitate to contact me if you have any questions regarding my comments. You can reach me by email at [redacted] or by phone at [redacted].

Sincerely,

Lillian Tsang

Lillian Tsang, P.E.
Principal Transportation Engineer
Department of Public Works

Cc: Trudi Ryan, Director, Community Development Department
Chip Taylor, Director, Department of Public Works
Ramana Chinnakotla, Director, Environmental Services Department
Shaunn Mendrin, Planning Officer, Community Development Department
Angela Obeso, Interim Transportation and Traffic Manager, Department of Public Works
George Schroeder, Principal Planner, Community Development Department
Jeffrey Cucinotta, Senior Planner, Community Development Department

From: [redacted]
To: Anderson, Eric B.
Subject: Scope of EIR for R3 Zoning Project
Date: Friday, August 8, 2025 11:30:42 AM

CAUTION: EXTERNAL EMAIL - Ensure you trust this email before clicking on any links or attachments.

Hi Eric,

Thanks for meeting with us yesterday. Here are my comments on the scope of the EIR for the R3 Zoning District Update Project.

1. Tall buildings cast shadows, especially in the wintertime when the sun is low. This will have a detrimental effect on nearby landscaping and solar power generation. In order to mitigate this, an adequate buffer zone is needed. Of course the area affected will be small compared to the overall size of the city, but for those living in the affected areas, the results could be disastrous. Their home could be plunged into perpetual shade, and their solar power investment wasted, along with a decrease in their property values.
2. A realistic parking study should be done as part of the EIR. As the state mandates that less and less parking is required while transit agencies are struggling to survive, what is a reasonable estimate of how many additional vehicles will need to park in the city and where will they do it? Many of the R3 districts already have streets that are fully parked. How can the cars for an additional 15-30,000 people be accomodated?
3. If the city zones for higher density housing and the population increases, can existing retail support that level of population growth? I'm thinking mostly of grocery stores and variety stores like Target and Walmart. Retail already seems to be taking a backseat to housing (e.g. San Antonio Center and Charleston Plaza). Will the situation only get worse as the city densifies?

Thanks for listening!
Albert Jeans

Chuck Muir
[redacted]
[redacted]
[redacted]
July 28, 2025

City of Mountain View Community Development Department
Attention: Eric Anderson
500 Castro Street, P.O. Box 7540
Mountain View, CA 940391

RE: CEQA Public Comment – Proposed Rezoning from R3-1H1S to R3-C (35 du/ac) and State Density Bonus Law impacts on future projects

Dear Planning Staff and City Council Members,

CEQA mandates that public agencies disclose and evaluate the environmental consequences of discretionary projects, including land use changes and rezoning that may alter a community's physical and visual environment (CEQA Guidelines §15002(a), §15378).

I am writing as a long-time resident of Mountain View who lives in close proximity to the parcels proposed for rezoning from R3-1H1S to R3-C (35 dwelling units per acre). I respectfully submit the following comments under the California Environmental Quality Act (CEQA) regarding the environmental impacts of this proposed zoning change.

While I understand the City's intention to increase housing availability, this proposal raises significant concerns about environmental impacts on the surrounding community that I believe warrant thorough analysis through a full Environmental Impact Report (EIR). Furthermore, California's recent updates to its **Density Bonus Law** (most notably through SB 330, SB 35, AB 2011, and SB 423) aim to accelerate the production of high-density housing by granting developers significant incentives when they include affordable units. These incentives include increased building heights, reduced parking requirements, streamlined approvals, and the ability to exceed local zoning limits such as density and setbacks. The goal is to encourage more housing, especially near transit and in urban infill areas, by overriding local restrictions that would otherwise limit residential development. In many cases, qualifying projects are protected from discretionary review, and cities are required to approve them if they meet objective standards. However, in this case the City of Mountain View is proposing changing zoning requirements to allow for high density housing even before any State density bonus laws are considered substantially increasing the impacts to existing residents, businesses, and wildlife.

While California's Density Bonus Law grants developers powerful tools—such as increased height, reduced parking, and deviations from local zoning—to promote the development of affordable housing, these incentives do not exempt projects from the California

Environmental Quality Act (CEQA) unless specific statutory exemptions apply. A project invoking density bonus provisions that proposes significant physical changes to a site—such as increased building mass, height, or intensity beyond what is normally allowed under existing zoning—may result in substantial environmental impacts that CEQA is expressly designed to evaluate.

Specifically, the proposed density increase may result in the following potentially significant environmental effects:

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1. Noise and Air Quality Impacts on Adjacent Residents

The increased density will substantially raise the number of residents and vehicles in the area, leading to more traffic noise, more HVAC units, more trash collection and greater daily activity adjacent to existing low-density homes. Construction-related noise and dust may also degrade local air quality and livability for nearby families, particularly those with young children or vulnerable health conditions. CEQA Guidelines Appendix G requires analysis of air pollutant exposure to sensitive receptors and substantial increases in ambient noise levels. I request a noise and air quality impacts analysis be done before the new R3 rezoning requirements go into effect.

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2. Shading, Privacy, and Visual Impacts

CEQA requires analysis of a project's potential to degrade the visual character or quality of the site and its surroundings (CEQA Guidelines Appendix G, Aesthetics). High-density housing, by its nature, introduces larger buildings with greater mass and height that are fundamentally out of scale with the surrounding single-story or two-story homes. These drastic changes in architectural scale, bulk, and intensity can irreparably alter the visual integrity and identity of a neighborhood, amounting to a substantial aesthetic impact. Courts have recognized aesthetics as a valid environmental concern under CEQA when changes in visual character are significant and noticeable to the public (e.g., *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903).

Rezoning that permits dense, multistory housing adjacent to traditional single-family homes disregards the established architectural cohesion and residential character of these neighborhoods. Such visual discord violates CEQA's mandate to evaluate whether a project substantially degrades the existing visual character or quality of the site and its surroundings.

If multi-story buildings are permitted under the new zoning, nearby single-story homes (such as mine) will be negatively affected by shadowing, reduced privacy, and potential visual

intrusions. This change will degrade the visual character of the neighborhood which CEQA recognizes as a valid aesthetic impact requiring mitigation.

Visual character and quality

Changes to Community Character: Projects are evaluated for potential impacts on the visual character of the existing neighborhood, such as alterations to architectural style, design, or overall ambiance.

Mass and Height: High-density housing's potential to introduce structures of greater mass and height compared to existing single-family homes is examined.

Consistency with Plans: Evaluation includes assessing the project's consistency with local plans and zoning ordinances that guide development and visual character.

Viewshed impacts

In addition to overall visual character, CEQA requires examination of a project's impact on scenic vistas and public viewsheds. Multistory high-density housing may obstruct valued public views of natural features, open space, or neighborhood landmarks, particularly in communities with lower building profiles. The introduction of taller structures in formerly low-density zones can also intrude upon private views and significantly diminish the sense of openness and privacy enjoyed by existing residents—another factor that CEQA deems relevant to aesthetic impacts.

Moreover, the proximity of large multi-unit buildings to single-family homes can result in a loss of privacy through elevated sight lines into private yards or interior living spaces. These cumulative visual intrusions can result in a substantial adverse effect on the community's aesthetic and environmental experience.

- Public Views and Vistas: The project's potential to block or obstruct valued public views, including scenic vistas or views of prominent landmarks, is a key consideration.
- Privacy and Proximity: The proximity and potential visual intrusion of higher density housing on adjacent single-family homes are examined.

Light and glare

CEQA further mandates evaluation of new sources of substantial light or glare that may adversely affect day or nighttime views in the area. High-density projects often incorporate exterior lighting for parking structures, walkways, balconies, and security purposes, which can introduce significant nighttime illumination incompatible with the subdued lighting typical of single-family neighborhoods. The spillover of artificial light can compromise

nighttime privacy and diminish residents' enjoyment of their homes, especially where no effective screening or mitigation is required.

- Daytime and Nighttime Views: The introduction of substantial light and glare from the new development and its impact on day and nighttime views in the area are evaluated.
- Impact on Adjacent Residences: Consideration is given to the impact of new light sources on the privacy and comfort of residents in adjacent single-family homes.

Overshadowing

One potential environmental impact of high-density housing developments near single-family homes is **the loss of access to sunlight**, which can significantly affect residents' ability to grow food, maintain trees, and support healthy plant life. Taller buildings introduced into lower-scale neighborhoods can cast prolonged shadows over adjacent properties, reducing the amount and duration of direct sunlight reaching yards, gardens, and open spaces. This shadowing effect, particularly in morning or late afternoon hours, can:

- **Hinder vegetable gardens and urban farming** by limiting photosynthesis, which most edible plants rely on for growth.
- **Stress or kill sun-dependent trees and shrubs**, especially fruit-bearing or native species that require full sun.
- **Alter microclimates**, reducing temperature and evaporation in shaded areas, which can increase mold, mildew, and soil moisture imbalance.
- **Reduce biodiversity**, as many pollinators and beneficial insects are drawn to sunlit gardens and habitats.
- **Diminish sustainability efforts**, such as residents trying to grow their own food or maintain carbon-sequestering green space.

These impacts, while localized, cumulatively degrade the ecological health and environmental resilience of low-density neighborhoods and should be considered under CEQA's analysis of indirect and cumulative environmental effects.

I request a shading, privacy, and visual impacts analysis be done before the new R3 rezoning requirements go into effect, so the public is fully aware of the potential impacts. I also request shading, privacy, and visual impacts analysis be done to demonstrate the potential impacts caused by developers or contractors claiming State exemptions under the various Density Bonus Laws.

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3. Transportation and Parking Effects

Higher density development will generate a significant increase in daily vehicle trips. Overflow parking and traffic congestion are likely to affect adjacent residential streets that were not designed for such intensity. CEQA requires review of potential safety impacts and level-of-service degradation, particularly near homes and pedestrian routes.

California's Density Bonus laws, particularly recent updates, allow qualifying housing projects to reduce or eliminate on-site parking requirements as a cost-saving and space-maximizing incentive. While this benefits developers and can help accelerate affordable housing production, the impact on existing neighborhoods and residents can be significant. Eliminating on-site parking often pushes overflow parking onto public streets, increasing congestion and reducing parking availability for current residents. In neighborhoods with older infrastructure or limited curb space, especially single-family areas, this can lead to traffic safety issues, blocked driveways, and tensions between new and existing residents. Additionally, the visual and functional character of these neighborhoods may be altered as high-density buildings without adequate parking introduce more vehicles than the area was designed to accommodate. Ultimately, while the exemption supports housing goals, it may create unintended burdens on communities already grappling with limited space and resources.

I request a transportation and parking analysis be done before the new R3 rezoning requirements go into effect.

---

4. Infrastructure and Public Services Capacity

It is unclear whether current infrastructure (water, sewer, stormwater, and electrical) is sufficient to support the added demand from the proposed density increase. CEQA requires an analysis of whether existing utility systems and public services can accommodate growth without significant expansion or degradation of service.

California's Density Bonus laws, by allowing increased housing density beyond what local zoning permits, can strain existing infrastructure and public services in established neighborhoods. Higher-density developments often introduce more residents than the area was originally planned to support, leading to increased demand on roads, water and sewer systems, stormwater infrastructure, parks, schools, and emergency services. In areas without prior upgrades or capacity planning, this can result in overloaded systems, reduced service quality, and accelerated infrastructure deterioration. Longtime residents may experience more traffic congestion, slower emergency response times, and crowded public facilities, especially if the density increase occurs without corresponding investments in infrastructure expansion or maintenance.

I request an infrastructure and public service capacity analysis be done before the new R3 rezoning requirements go into effect.

---

5. Cumulative Environmental Impacts

This rezoning, combined with similar recent and anticipated developments in the area, may contribute to cumulative impacts on noise, air quality, traffic, aesthetics, and infrastructure. CEQA requires that the City consider the combined effect of this zoning change along with past, present, and reasonably foreseeable future projects.

Request for Environmental Impact Report (EIR)

Considering the above, any rezoning that permits high-density housing adjacent to established single-family homes must undergo a full CEQA review, with careful analysis of aesthetic impacts. These include alterations to community character, loss of visual privacy, obstruction of views, and introduction of light and glare. Such changes are not minor nor purely subjective—they are environmental effects that directly influence the quality of life for existing residents and the physical context of the community.

Approving such rezoning without fully addressing and mitigating these impacts would violate CEQA's intent to ensure informed decision-making and public transparency. Unless these aesthetic issues can be effectively mitigated or avoided, the rezoning should not proceed as proposed.

Given the scale of the proposed zoning increase and the close proximity to existing low-density, single-family homes, I request that the City prepare a full **Environmental Impact Report (EIR)** to ensure all the above concerns are adequately analyzed, disclosed, and mitigated. A Mitigated Negative Declaration would not sufficiently capture the potentially significant and long-term impacts this zoning change may cause.

Thank you for your consideration of this comment. I urge the City to approach this rezoning with care, balancing housing goals with the well-being and environmental quality of current residents.

Sincerely,

Chuck Muir

Chuck Muir

July 23, 2025

From: Daniel Shane, [redacted]

To: Eric Anderson, Planning Manager, City of Mountain View

Re: Comments regarding the scope and content of the EIR for the R3 Zoning District Update

Dear Mr. Anderson,

I appreciate the opportunity to provide my individual input regarding the scope and content of the EIR for the R3 Zoning District Update.

Background

For the past 3.5 years I have developed and advocated ideas, potential solutions, and practical remedies to difficult and complex problems that have continued over decades and have created new challenges for all cities.

I know there are competing interests that must be balanced and evaluated in all decisions made by the city officials such as the need for more affordable housing and protection of our important urban natural resources. I believe that city zoning has an important function in both meeting the growing housing demand and the protection of public health, welfare, environment, and climate. This is a big key challenge for all municipalities.

Zoning should not be done in a vacuum but be part of a holistic strategy to provide more housing and protect our precious and limited natural urban natural resources where feasible. City policies, goals, priorities, plans (i.e., biodiversity and urban forestry plan, parks and recreation strategy, city regulations (i.e., ordinance and codes), and zoning requirements are all part of the holistic strategy. The city should acknowledge that they are all part of an interdependent relationship.

I believe there are good practical and feasible solutions that have either not been considered or not implemented to date for a variety of reasons which I will not get into.

According to the city, the zoning updates may have probable environmental effects. The EIR will identify and evaluate the potentially significant environmental impacts and evaluate whether there are feasible mitigation measures that may lessen or avoid the impacts. The city has listed potentially significant environmental effects related to 19 environmental issues.

Comments

The creative ideas from both city staff and the public are key to shaping an innovative zoning plan that will be responsive to community, environment, climate, and public health needs and will accomplish a bold new vision for our communities, neighborhoods, parks, facilities, programs, and open spaces on both private and public lands.

The city has several key goals and priorities including greater environmental sustainability, climate change actions, biodiversity and urban forestry, improved air quality and public health that are relevant to zoning decisions.

To better meet these goals and priorities it is important to add urban forests, highway vegetation barriers, climate, and public health to the list of 19 potentially significant environmental effects. There needs to be an acknowledgement that significant environmental features such as urban forests and highway vegetation barriers provide important benefits such as climate resilience, environmental sustainability, cleaner air quality, and improved public health. Highway vegetation barriers are often associated with urban forests on private lands and act as noise and air pollution barriers between mobile and stationary emission sources and residential neighborhoods. This results in significant health benefits to people living in residential areas located near roadway and highway infrastructures.

Urban forestry and highway vegetation barriers are especially important for private lands that will fall under R3 zoning requirements. Some of these private lands may have significant natural resources such as trees, forests, highway vegetation barriers, wildlife habitat for birds, mammals, reptiles, and amphibians, native plants that support pollinators such as hummingbirds. bees, bats, butterflies, moths, beetles, ants, wasps, and even small mammals.

In that light, I submit my innovative ideas that can be a part of the grand vision. Multi-purpose natural urban forests on private land should be an important element in the R3 zoning requirements because these important natural resources could be deeded to the city by corporate developers pursuant to park land dedication policies, municipal ordinance and codes.

These administrative and regulatory tools can be modified to better preserve natural open spaces, natural urban forestry, wildlife habitat, native pollinator plants, carbon sinks, clean air quality, noise buffering, climate moderation, park-like amenities, and natural ecosystems that are nature's laboratory and strategic stockpile for sustainable and resilient environmental evolutionary "DNA", and many more benefits to the community and beyond.

Some other ideas for accomplishing this vision are:

(1) Modify existing municipal policies, plans, ordinances, and codes such as Chapter 41 - Park Land Dedication or Fees In Lieu Thereof.

Some ideas include adding important natural resources such as urban forests and highway vegetation barriers for consideration along with public parks and recreational facilities and envisioning urban forests as potential multi-purpose resources with potential park-like amenities.

Additionally, properties zoned for commercial use should be added to the existing residential properties zoned R1-R4 for the purposes of this Chapter because workers also enjoy the benefits of our parks and urban forests.

A partial marked-up copy of Chapter 41with recommended modifications is available upon request.

(2) update and revise the Formal Planning Development Application Checklist
(planning checklist)

The planning checklist places the environmental setting at the very end of the many various elements to be reviewed and evaluated. There needs to be higher priority given to natural resources on the project site and consideration for the important environmental features.

The planning staff need more environmental information and data to perform a thorough evaluation of the environmental setting and potential impacts of the proposed project on the environment, climate, and public health.

A marked-up copy of the planning checklist with added language is available upon request.

(3) develop a new policy or requirement for developers to conduct a community early engagement process (CEEP) during the earliest phases of the project planning and design process.

This would involve engaging the community prior to large spending on engineering plans and designs, tours of the project site, providing opportunities for community to voice their issues, concerns, ideas, and potential mitigations to impacts of the project to public health, safety, environment, climate, and other issues, concerns, and suggestions.

The purpose would be to consider community input for incorporation into the developer's initial project plans and designs, protect important natural resources, improve the health & safety of the community, and enhance amenities.

The result should be reduced project delays, elevated trust and goodwill between the developer and community, significant savings in time and money needed to move development through the administrative review and approval process.

(4) Educate developers, consultants, and the public on a new model for project plans and designs. More education and outreach are needed to communicate a paradigm shift in planning and designing housing and commercial developments that can better meet energy and environmental sustainability, climate change action, and public health goals.

The building, development, and design industry need new direction, model, and guidance. The city no longer has the time or desire to review old, outdated, unimaginative, non-innovative, unsustainable, non-resilient, and eco-unfriendly project plan designs that are submitted by many, but not all, developers.

The city needs to communicate to developers a new vision that places the protection of public health, welfare, environment, and climate at the pinnacle of their development priorities.

It is a vision that realizes the importance of nature in our lives and seeks to integrate, rather than replace, our natural environmental ecosystems. It is a vision that crushes the myth that housing and nature, profit and sustainability, are mutually exclusive. This is categorically untrue.

We can build more affordable housing and try not to displace nature but to integrate nature, or the green infrastructure, with the human infrastructure.

We do not want to replace our natural urban forests with artificial landscapes void of mature, complex, and evolved natural ecosystems. But we can enhance these areas by planting more trees, native pollinator plants and bushes where they are needed to fill gaps in the noise and pollution barrier, canopy, understory, and on the fringes of the forest.

It is a vision that acknowledges the science that has proven the importance of natural highway vegetation barriers for the protection of public health by buffering high levels of noise, filtering soot particulates, and absorbing pollutants and contaminants such as volatile organic compounds from vehicle emissions.

Scientific evidence indicates exposures to environmental contaminates such as automotive highway emissions cause higher incidences of chronic disease and cancer. Medical and healthcare costs have skyrocketed in Santa Clara County and beyond.

These natural barriers are usually associated with urban forests on private lands. I propose we conduct an inventory of urban forests that are one acre or greater in size on private (and public) lands to quantify, and bring more situational awareness, to the number and importance of urban forests on private lands.

These barriers need to be preserved, restored, and enhanced in our neighbors, schools, and other public areas to protect the residents and school children from exposures to hazardous airborne emissions from mobile and stationary sources.

You will most assuredly have questions for me and require more details about my ideas and recommendations. Please contact me anytime to discuss this email or even better have your staff meet with me.

Sincerely,

Daniel Shane
Environmental Coordinator, Educator, Advocate, and Solutionist
[redacted]

Mountain View YIMBY

Dear Mountain View Community Development Department,

In line with our June 24 letter to the Council, we would like the EIR to study an alternative that applies R3-D2 standards to all R3 Change Areas (i.e. all R3-D1 is at R3-D2 densities). We believe this would provide the city with maximum flexibility for future decisions as decisions that may increase densities in the Change Area would be covered by this alternative, avoiding the need for supplemental amendments and their associated costs and delay.

We would also like the alternative to study applying R3-A to all R2 properties in order to provide the city with flexibility, given R2 in some fashion is as dense as R1. The alternative should also include rezoning any nonconforming property in R1 or R2 to a zoning district that conforms to the property; doing so provides clarity and transparency for all.

Best Regards,
David Watson

On behalf of Mountain View YIMBY

From: [redacted]
To: Anderson, Eric B.
Subject: Input for R3 EIR Preparation
Date: Monday, August 11, 2025 10:14:29 PM

CAUTION: EXTERNAL EMAIL - Ensure you trust this email before clicking on any links or attachments.

Hello Eric and City Staff Preparing EIR for R3 Project,

Thank you for the opportunity to give input on considerations for environmental analysis when preparing the EIR for R3 up-zoning project.

Per Eric's presentation on July 23, 2025, the R3 project will add estimated 10,000 to 16,000 new dwellings in MV. This will lead to significant increase in buildings with stories anywhere from 7 to 14 depending on the projects and the state density bonuses that developers may utilize. It will also result in significant loss of thousands of mature heritage trees and green canopy as they are not protected or required to be preserved within the future buildings.

The EIR environmental analysis does include categories (per presentation) such as Agriculture/Forestry, Air Quality, Green House Gas Emissions (GHGe), but it needs to add more serious adverse effects of Climate Change/Extremes, Urban Heat Island Phenomenon, Loss of Biodiversity, all of which will lead to poor Respiratory and Mental Health impacts.

There are many cities around the world that have gone through densification without considering open space and retention of green resources, namely trees, and have as a consequence reduced the quality of life for its inhabitants. Once the buildings are up and the mature green canopy is gone, there is no going back to balanced sustainable living.

Let's carefully evaluate the proposed high increase of infrastructure and plan to mitigate negative adverse impacts accordingly.

Sincerely,
Hala Alshahwany
MV Resident[redacted]

LEAGUE OF WOMEN VOTERS®
OF LOS ALTOS-MOUNTAIN VIEW AREA

July 24, 2025

Re: Draft EIR for R3 Zoning District Update Project

Dear City of Mountain View Community Development Department:

The League of Women Voters (LWV) supports actions that increase the stock of housing and particularly affordable housing. The LWV also supports diversified housing and the involvement of community members throughout the process when land use decisions are made.

While the City Council has tentatively set the densities for the designated change areas, the LWV suggests that the Environmental Impact Report (EIR) evaluate all the proposed change areas based on the potential R3-D2 (multiple family housing – 6 stories) designation in an alternative. This approach would allow the City Council greater flexibility when it finalizes the standards and densities of change areas, given that any future modifications that increase density would already have been evaluated under this EIR, thus avoiding a potential supplemental EIR.

Please send any questions about this letter to Kevin Ma, Co-Chair of the Housing Committee, at housing@lwvlamv.org.

Sincerely,

Katie Zoglin
President
Los Altos-Mountain View Area LWV

From: [redacted]
To: Anderson, Eric B.
Subject: R3 discussion
Date: Monday, August 11, 2025 4:38:04 PM

CAUTION: EXTERNAL EMAIL - Ensure you trust this email before clicking on any links or attachments.

TO: Eric Anderson, Planning, City of Mountain View

Dear Mr. Anderson,

Thank you very much for taking your time to answer questions. The R3 zoning is obviously controversial. I am not sure why it is being redone, but I am sure that the continual urge to build is fed, behind the curtain, by the profits coming from building apartments. I know that the state wants more and more growth. It does appear that the fast taking over of AI will reduce human employment. There will be bright computer folks learning how to teach AI, and once the robots are even better than now, there will be still fewer humans. The human species need to eat and look for health insurance. The AI just plugs in. Who will live there?

When Sacramento started to spread the word that we have a housing crisis, some representatives talked about the citizens with low to moderate incomes needing apartments or even homes that could be within their budgets. However, large and tall developments are not looking at places for even moderate incomes. So, I regret to say, a lot of what is being discussed is baloney.

The plan that I have heard at Council meetings will change Mountain View into a high rise, urban setting. It will also chase out owners of single family dwellings, if they are financially able to relocate. Why would someone move? Because having a high rise next door or nearby will drop the home's property value. It will also take away privacy, sunlight, and air, but when the dwelling's value is drops – the owners cannot sell it for enough to cover a move. I recognize that the City and the State are very anti-single family homes. Why is that? Because their hearts are happy when they can house more needy individuals and families? I don't think so. The developments are not focusing on those individuals and families. The market rate for an apartment is high. It is not aimed at moderate incomes.

Mountain View's new apartments will have no places to park cars. This will cut down on driving cars. That is one good health effort. It is a rule that everyone works, goes to school, goes to a grocery store within walking distance. from the R3 apartments. Will the train cooperate by having the stops within a half mile strolling to one's work? New schools will need to replace the current ones. The builders will remember to put in weight lifting gyms to get shoppers reading for walking back from the grocery. IF a grocery is within a half mile from the apartments, I guess everyone could drop in to the grocery daily. There is a little math which the state senators ignore: a half mile walk to schools or grocery stores, turns into one mile on the way back. Carrying grocery bags, and maybe carrying or leading children there and back with full bags; this is reality.

Another look at reality: Mountain View will be aged-ly cleared from most individuals over 40 or 45 who do not want to ride a bike in traffic. Since I have never once seen a cyclist stop for a stop sign, perhaps the City will provide insurance for bicycle injuries. Mr. Anderson, I have sincere respect for you and your job. I know that you are well informed. I hope that Mtn. View citizens will hear about these changes and become more involved.

Thank you for your kind attention, Leslie Friedman, Aug. 11, 2025

Leslie Friedman, Ph.D., History, Stanford University

Dancer: "with her strong technique and capacity for expression she was simply a joy to watch!"–***The Times*, London**

Author: *The Dancer's Garden*, "I love it. It is a perfect book, in conception and execution....a marvelous writer..." Diana Ketcham, *House & Garden*, Editor; Books Editor, *The Oakland Tribune* (ret)

"There is so much delight and poetry and wisdom to be found in the garden and in this book!" Sharon Abe, CA Academy of Sciences (ret)

The Story of Our Butterflies: Mourning Cloaks in Mountain View, "This is a wonderful book. I look forward to sharing it with the rest of our staff here." Joe Melisi, Center for Biological Diversity, (national conservation organization)

"Leslie Friedman is an historian, a dancer and choreographer, and now a perceptive writer about nature...in a second splendid work she takes wing into the world of butterflies...One is grateful for this delightful book, so well written and illustrated." Peter Stansky, Author, Historian, Prof. Stanford

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Michelle Carr

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

July 15, 2025

Eric Anderson
City of Mountain View
500 Castro Street
Mountain View CA 94039

Re 2025070500 R3 Zoning District Update Project Santa Clara County

Dear Mr. Anderson:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completian of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that on application for a project is complete or of a decision by a public agency to undertake a project, a lead agency sholl provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated Califarnia Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- **a.** A brief description of the project.
- **b.** The lead agency contact informotion.
- **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A leod agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native Americon tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resaurces Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- **a.** Alternatives to the project.
- **b.** Recommended mitigation measures.
- **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- **a.** Type of environmental review necessary.
- **b.** Significance of the tribal cultural resources.
- **c.** Significance of the project's impacts on tribal cultural resources.
- **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Cade §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any informatian, including but not limited to, the location, description, and use of tribal cultural resources submitted by a Califarnia Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe thot pravided the information consents, in writing, to the disclosure of some or all of the information ta the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
- **b.** Whether feasible alternatives or mitigatian measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: [redacted]

Sincerely,

Mathew Lin

Mathew Lin
Cultural Resources Analyst

cc: State Clearinghouse

Outlook

RE: NOP to the R-3 Zoning District Update EIR- Public Notice

From

Date Mon 7/21/2025 4:14 PM

To Wu, Elton H <[redacted]>; Anderson, Eric B. <Eric.Anderson2@mountainview.gov>; Murdock, Christian

Cc [redacted]

CAUTION: EXTERNAL EMAIL - Ensure you trust this email before clicking on any links or attachments.

Hi, Eric:

To underscore Elton's comments, the City and County of San Francisco, through the SFPUC, owns its pipeline right of way in fee and not as an easement.

Thank you in advance for removing the SFPUC's property in Mountain View from the zoning update.

Rosanna Russell

Real Estate Director

From: Wu, Elton H <[redacted]>
Sent: Monday, July 21, 2025 3:22 PM
To: Eric.Anderson2@mountainview.gov
Cc: [redacted]
Subject: NOP to the R-3 Zoning District Update EIR- Public Notice

Hello Eric,

Thank you for the Notice of Preparation for the EIR for the R-3 Zoning District Update Project. The SFPUC provides the following preliminary comments:

The SFPUC's water transmission right of way extends across the City of Mountain View in an east-west direction (please see attached map). To protect its water supply infrastructure and to allow maintenance and operation activities, the SFPUC's policies do not allow structures to be built on its pipeline right of way. Therefore, housing is not permitted on the SFPUC's property in Mountain View. The proposed zoning map update should reflect the SFPUC's policy and exempt SFPUC property from zoning updates.

Please contact me if you have any questions or need further information. Thanks.

Elton Wu

Pronouns: He/ Him

Environmental Compliance and Land Planner

SFPUC Water Enterprise

Natural Resources and Lands Management Division

525 Golden Gate Avenue, 10th Floor

San Francisco, CA 94102

[redacted]

[redacted]



From: [redacted]
To: Anderson, Eric B.
Subject: Letter from Livable Mountain View on R3 zoning update Draft EIR scoping
Date: Monday, August 11, 2025 12:05:39 PM

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To those preparing the Draft EIR for the R3 zoning update project,

Livable Mountain View thanks Mountain View city staff for this opportunity to comment on the scoping of the Draft EIR for the R3 zoning update project. We also thank Advance Planning Manager Eric Anderson for hosting a Q & A session with our group on this subject. Mr. Anderson urged us to summarize our comments in a formal letter, so we are doing that here:

1. We ask that the those preparing the Draft EIR consider the **state density bonus** when determining the impacts of the R3 project. In particular, since Mountain View has a 15% inclusionary affordable housing mandate, developers will meet the 50% density bonus requirement simply by following the Mountain View mandate. This is why projects like Chase Bank redevelopment are opting for the 50% state density bonus. Furthermore, by providing another 5% of affordable housing, a 100% density bonus would be permitted. The Draft EIR should NOT ignore this by studying only the base density.

2. We ask that the Draft EIR be delayed until after **September 12, 2025,** so that the results of the **California Assembly vote on SB79** are known. SB79 would permit BY RIGHT 5-7 story buildings (up 10-14 stories with the state density bonus) within one-half mile of train, light rail, and frequent bus stops. This would significantly alter the permitted zoning in our city. It is best to undertake the Draft EIR AFTER the SB79 vote in taken.

3. We ask that impacts on infrastructure needs, in particular water usage, the effects on climate change, and greenhouse gas emissions be adequately considered.

4. We ask that the cumulative effect of background projects, for example, the Moffett Precise Plan and frequent gatekeeper project approvals, be considered.

5. We ask that the Draft EIR make specific positive recommendations that

will mitigate the effects of the R3 upzoning project. It would be greatly disappointing if this Draft EIR ends up being just a legally mandated but practically meaningless exercise.

Thank you for listening to our recommendations on this important topic.
Robert Cox, Louise Katz, Peter Spitzer, Maureen BNlando, Hala Alshahwany, Chuck Muir, Julie Muir, Muriel Sivyer-Lee, Nancy Stuhr, Toni Rath, Natalie Solomon, Jerry Steach, and Lorraine Wormald
For the Steering Committee of Livable Mountain View

County of Santa Clara
Roads and Airports Department

101 Skyport Drive
San Jose, California 95110-1302
1-408-573-2400

August 6, 2025

VIA EMAIL (Eric.Anderson2@mountainview.gov)

City of Mountain View
500 Castro St.
Mountain View, CA 94041
Attn: Eric Anderson

SUBJECT: Roads and Airports Department Comments on the R3 Multifamily Residential Zoning Update

The County of Santa Clara Roads and Airports Department (the "Department") appreciates the opportunity to review and comment on the R3 Multifamily Residential Zoning Update. On behalf of the Department, we submit the following comments:

- Traffic Impact Analysis (TIA) to include proposed grade separation projects at Central/Rengstorff and Central/Castro. This includes the Mountain View Transit Center, Castro Street full closure, and potential Central/Castro grade separation for pedestrians and bikes.
- TIA to include future Class I – Shared Use Path along Central Expressway, refer to the County Active Transportation Plan documents.
- TIA to look at pedestrian and bike connectivity across Caltrain railroad tracks.
- Please include all signalized intersections on Central Expressway from San Antonio to Bernardo in the Transportation Impact Analysis.
- Refer to recently adopted VTA, TIA, and TOA Guidelines for LOS analysis.

Thank you again for your continued outreach and coordination with the Department. If you have any questions or concerns about these comments, please feel free to contact me at [redacted]

Thank you,

Board of Supervisors: Sylvia Arenas, Betty Duong, Otto Lee, Susan Ellenberg, Margaret Abe-Koga
County Executive: James R. Williams

From: [redacted]
To: Anderson, Eric B.
Subject: RE: R3 Zoning District Update Project
Date: Friday, August 15, 2025 11:48:29 AM

CAUTION: EXTERNAL EMAIL - Ensure you trust this email before clicking on any links or attachments.

Hi Eric,

Thanks for the extension. Following are Santa Clara Valley Water District (Valley Water) comments:

1. Since the proposed project/Zoning update includes the potential to increase water supply demand by more than 500 residential units, according to SB610, the water retailer is required to prepare a Water Supply Assessment to evaluate water supply availability. The DRAFT EIR include a Water Supply Assessment as part of the evaluation of Hydrology and Water Quality impacts with the assumption that this project will likely increase the City's water demand and clearly define the project's potential impact on Mountain View's water supply and availability.
2. Please note that any work within or adjacent to Valley Water right of way will need an encroachment permit, in accordance with the Water Resources Protection Ordinance. Permits take about 6-8 weeks for approval.

Please inform Valley Water if there are any other documents for review on this project,

Thank you,

Shree Dharasker
Associate Engineer Civil
Community Projects Review Unit
[redacted]

Appendix B

AB 52 and SB 18 correspondence

AB 52 Correspondence Tracker for the R3 Zoning District Update for the City of Mountain View

Contact List	Notice (Date Received/ Method of Delivery)	Documentation of Response (Date/Type/Comments-Concerns/potential or confirmed TCR identified)	Follow up Documentation (Date/Type/Comments-Concerns/TCR Mitigation discussed)	Consultation Documentation (Date/Type/Comments-Concerns, TCR Mitigation Agreements, Close of Consultation)
Tamien Nation Johnathan Wasaka Costillas, THPO 10721 Pingree Road Clearlake Oaks, CA, 94523 thpo@tamien.org	Notice returned to sender	See below	See below	See below
Tamien Nation Quirina Luna Geary, Chairperson PO Box 8053 San Jose, CA, 95155 qgeary@tamien.org	9/2/2025 Certified Mail	9/3/2025 Telephone call with overview of standard consultation process 9/10/2025 Email requesting consultation	9/19/2025 Emailed documentation of standard COAs 10/30/2025 Virtual meeting, Tribal Rep requested GIS data of project, City provided	No response to data provided

R3 Zoning District Update for the City of Mountain View SB 18 Correspondence Tracking

Contact List Received from NAHC on June 24, 2025	Date Letter Sent to Contact	Date of Phone Contact	Comments/Concerns
Amah Mutsun Tribal Band Valentin Lopez, Chairperson P.O. Box 5272 Galt, CA, 95632 vjltestingcenter@aol.com	August 20, 2025		
Amah Mutsun Tribal Band Ed Ketchum, Vice-Chairperson aerieways@aol.com	August 20, 2025		
Amah Mutsun Tribal Band of Mission San Juan Bautista Shelby Brown, Senior Cultural Monitor & Consultant, Councilwoman 2451 Tyrolean Way Sacramento, CA, 95821 shelbyzimmer1997@gmail.com	August 20, 2025		
Amah Mutsun Tribal Band of Mission San Juan Bautista Garry Zimmer, Senior Cultural Monitor & Consultant PO Box 214211, 2929 Fulton Ave Unit 19 Sacramento, CA, 95821 garryzimmer@gmail.com	August 20, 2025		
Amah Mutsun Tribal Band of Mission San Juan Bautista Christopher Zimmer, Senior Cultural Monitor & Consultant, Councilman PO Box 214211, 2929 Fulton Ave Unit 19 Sacramento, CA, 95821 cdzimmer93@gmail.com	August 20, 2025		

Contact List Received from NAHC on June 24, 2025	Date Letter Sent to Contact	Date of Phone Contact	Comments/Concerns
Amah Mutsun Tribal Band of Mission San Juan Bautista Michelle Zimmer, Senior Cultural Monitor & Consultant PO Box 214211, 2929 Fulton Ave Unit 19 Sacramento, CA, 95821 michellezimmer1966@gmail.com	August 20, 2025		
Amah Mutsun Tribal Band of Mission San Juan Bautista Irenne Zwierlein, Chairperson 3030 Soda Bay Road Lakeport, CA, 95453 amahmutsuntribalcommunications@gmail.com	August 20, 2025		
Costanoan Rumsen Carmel Tribe Henry Muñoz, Cultural Resource Officer 108 South Acacia Rialto, CA, 92376 crct.crd@gmail.com	August 20, 2025		
Costanoan Rumsen Carmel Tribe Samuel Rodriguez, Cultural Resource Officer 29539 Oakbridge Dr Menifee, CA, 92586 crct.crd@gmail.com	August 20, 2025		
Costanoan Rumsen Carmel Tribe Carla Munoz, Tribal Council crct.crd@gmail.com	August 20, 2025		
Indian Canyon Mutsun Band of Costanoan Ann Marie Sayers, Retired Honorable Elder P.O. Box 28 Hollister, CA, 95024 admin@kanyonkonsulting.com	August 20, 2025		

Contact List Received from NAHC on June 24, 2025	Date Letter Sent to Contact	Date of Phone Contact	Comments/Concerns
Indian Canyon Mutsun Band of Costanoan Kanyon Sayers-Roods, Tribal Chairwoman 971 S 7th Street San Jose, CA, 95122 kanyon@kanyonkonsulting.com	August 20, 2025 10/1/2025 City emailed additional information on request	No reply	Monitoring of projects Signage and other acknowledgements
Muwekma Ohlone Tribe of the SF Bay Area Richard Massiatt, Councilmember/MLD Tribal Rep. 1169 S. Main Street, Ste. 336 Manteca, CA, 95337 rmassiatt@muwekma.org	August 20, 2025 9/22/2025 Tribal Rep emailed (unclear request), City replied requesting confirmation 10/1/2025 Tribal Rep emailed confirming formal request for consultation 10/2/2025 City emailed additional information on request	No reply	Monitoring of projects
Muwekma Ohlone Tribe of the SF Bay Area Charlene Nijmeh, Chairperson 1169 S. Main Street, Ste. 336 Manteca, CA, 95337 cnijmeh@muwekma.org	August 20, 2025		
Northern Valley Yokut / Ohlone Tribe Katherine Perez, Chairperson P.O. Box 717 Linden, CA, 95236 canutes@verizon.net	August 20, 2025		

Contact List Received from NAHC on June 24, 2025	Date Letter Sent to Contact	Date of Phone Contact	Comments/Concerns
Northern Valley Yokut / Ohlone Tribe Timothy Perez, Tribal Compliance Officer P.O. Box 717 Linden, CA, 95236 huskanam@gmail.com	August 20, 2025		
Tamien Nation Johnathan Wasaka Costillas, THPO 10721 Pingree Road Clearlake Oaks, CA, 94523 thpo@tamien.org	August 20, 2025		
Tamien Nation Quirina Luna Geary, Chairperson PO Box 8053 San Jose, CA, 95155 qgeary@tamien.org	August 20, 2025	Virtual meeting on September 3, 2025 9/19/2025 City emailed additional information on request Virtual meeting on October 30, 2025 10/30/2025 City emailed additional information on request	Request for follow-up information, including GIS data of project
Tamien Nation Lillian Camarena, Secretary 336 Percy Street Madera, CA, 93638 Lcamarena@tamien.org	August 20, 2025		
The Ohlone Indian Tribe Desiree Vigil, THPO 259 Winwood Avenue Pacifica, CA, 94044 dirwin0368@yahoo.com	August 20, 2025		

Contact List Received from NAHC on June 24, 2025	Date Letter Sent to Contact	Date of Phone Contact	Comments/Concerns
The Ohlone Indian Tribe Vincent Medina, Cultural Leader 17365 Via Del Rey San Lorenzo, CA, 94580 vincent.d.medina@gmail.com	August 20, 2025		
The Ohlone Indian Tribe Andrew Galvan, Chairperson P.O. Box 3388 Fremont, CA, 94539 chochenyo@AOL.com	August 20, 2025		
Wuksachi Indian Tribe/Eshom Valley Band Kenneth Woodrow, Chairperson 1179 Rock Haven Ct. Salinas, CA, 93906 kwood8934@aol.com	August 20, 2025		

Appendix C

Transportation Impact Analysis prepared by Fehr & Peers

Fehr & Peers

City of Mountain View R3 Zoning District Update

Transportation Analysis for the Environmental Review

Submitted to:
Opticos Design Inc. and City of Mountain View

Submitted on:
October 14, 2025



City of Mountain View R3 Zoning District Update:

Transportation Analysis for the Environmental Review

Prepared for:
Opticos Design Inc. and City of Mountain View

Submitted on:
October 14, 2025

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Executive Summary

Overview

The City of Mountain View proposes a comprehensive update to its R3 Zoning District Code to facilitate higher-density, multifamily housing across targeted infill locations. The update introduces a tiered zoning framework (R3-A to R3-D2), raising allowable densities from 12 to 110 dwelling units per acre (du/ac), and aligns local regulations with state housing laws and Housing Element Programs 1.3 and 1.5.

Transportation Analysis Approach

In compliance with Senate Bill 743 and CEQA guidelines, the Transportation Assessment (TA) uses infill housing vehicle miles traveled (VMT) assessment methods to evaluate the Project's transportation impacts. This approach was selected due to the scale of the Project and the uncertainty of future development patterns, which make traditional modeling tools insufficient.

Project Description

The Project proposes an updated tiered R3 multifamily zoning (R3-A, R3-B, R3-C, R3-D1, R3-D2) with densities from 15 to 110 du/ac. Current realistic development capacity in R3 areas is about 2,000–3,500 units, based on the allowed density and potential redevelopment at under-utilized sites. The Project could enable approximately five times more development, or 10,000–16,000 units citywide, by increasing density on key corridors and redeveloping large, underutilized lots. This analysis assumes buildout over the 25–30-year horizon. Other uses, such as small-scale retail or community facilities, may accompany housing, but the focus is residential.

The Project incorporates Council priorities for expanding housing options, with an emphasis on apartments, condominiums, and affordable units that address "missing middle" income needs. It implements Housing Element Programs by upzoning marginal R2 lots, allowing SB 9 splits, and protecting existing multifamily housing. The Project also aligns with the Housing Accountability Act and State Density Bonus law by streamlining approvals, codifying objective design standards, and significantly increasing feasible housing density citywide.

Council-Adopted Goals: The Project was guided by City Council goals to[1]:

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.*

[1] City of Mountain View. (2025). *Project description: R3 Zoning District Update.* In *Draft Environmental Impact Report.* City of Mountain View Community Development Department, Planning Division.

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.*
6. *Encourage parcel aggregation.*

Housing Element Integration: Key Housing Element programs integrated into the Project include[2]:

- ***Program 1.3(a):*** *Conduct a development prototype study, update definitions as necessary for consistency between plans and districts, and revise multifamily development standards in major districts (including R3) and Precise Plans to ensure projects can, at minimum, meet their allowed density and are economically feasible, where possible through reductions of physical development standards. Economic feasibility and the cumulative effects of standards will be inputs in the reduction of standards. Where appropriate, calibrate standards to lot size. Focus on standards with the greatest feasibility impacts on underutilized sites, such as open area, parking, and building coverage.*
- ***Program 1.3(c):*** *Ensure that zoning code is updated to reflect densities and other standards as required by state law (e.g., SB 478).*
- ***Program 1.3(e):*** *Study live-work as an allowed residential use near retail areas, major corridors and other viable locations.*
- ***Program 1.3(h):*** *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 unties 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.*
- ***Program 1.5:*** *Update the Zoning Ordinance to allow replacement of multifamily development in the R1 and R2 districts with non-conforming density to preserve units above the allowed density in the underlying zone.*

Consistency with State Law

The ordinance will incorporate requirements from 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 the Housing Accountability Act to support streamlined approval of qualifying projects and full compliance with state mandates. Other housing-related legislation relevant to the Project are detailed and described later in this report.

Zoning Framework

The Project establishes a graduated set of districts, the proposed density and purpose of each is detailed in **Table ES 1** below.

[2] City of Mountain View. (2023). *2023–2031 housing element of the general plan.* City of Mountain View Community Development Department, Planning Division. Retrieved October 10, 2025, from https://www.mountainview.gov/our-city/departments/community-development/planning/regulations/housing-element

Table ES 1: Zoning Framework

District	Maximum Density (du/ac)	Purpose
R3-D2	75 – 110	Highest-intensity stacked-flat and mixed-use sites
R3-D1	50 – 75	Mid-rise multifamily neighborhoods
R3-C	35	Form-based standards for established Medium-High Density General Plan designation areas
R3-B	25	Form-based standards for established Medium Density General Plan designation areas
R3-A	15 – 20	Moderate increases for current R2 locations
R2	12	Amended to enable SB 9 lot splits and additional ADUs

Source: Fehr & Peers, 2025.

Under the update, existing R3-zoned sites would be rezoned into the new subdistrict framework based on the following:

- Sites identified by the City Council on March 25, 2025 and June 24, 2025, generally focusing on areas with larger parcels (among other criteria) would be reclassified to R3-D1 and R3-D2.
- Areas where R3-D1 and R3-D2 designations transition to single family neighborhoods would have "Transition Zones" where lower densities apply.
- Remaining sites with an existing general plan designation of Medium Density Residential would be reclassified to R3-B.
- Remaining sites with an existing general plan designation of Medium-High Density Residential would be reclassified to R3-C.

Existing R2-zoned sites (typically ~12 du/ac) could be reclassified as R3-A (15–20 du/ac), or would allow SB 9 type development that could create up to 4 units per typical parcel (plus allowance for additional ADUs). It is projected that these changes would roughly quintuple development capacity, enabling on the order of 10,000–16,000 new housing units citywide by infill development along key corridors and on large, underutilized lots. For analysis purposes, it is assumed this added capacity would build out over a 25–30-year horizon. While small-scale retail or community facilities may be included in some R3 projects, the Project's focus is overwhelmingly residential.

The Project reflects Council priorities for diverse housing types (e.g. affordable units, apartments, condominiums, stacked flats) and strong pedestrian-friendly design. It also integrates the Housing Element programs listed above (such as up-zoning some R2 areas to R3, allowing SB 9 lot splits, and protecting existing multifamily units). The updated code will align with state laws like the Density Bonus and Housing Accountability Act. By streamlining approvals and codifying objective design standards, the Project aims to facilitate significantly more housing production with fewer regulatory barriers.

CEQA Impacts and Mitigation Summary

Direct VMT Impact

The R3 Code Update is a policy action that facilitates infill housing development. On its own, the zoning change does not generate vehicle trips. However, future housing built under the new zoning could influence citywide travel patterns.

In general, infill multifamily housing generates lower VMT per capita rates than equivalent growth in outlying areas, due to shorter trip distances and increased use of walking, biking and transit modes.

The Project does not reduce existing housing affordability– there is no direct displacement of affordable units. This aligns with California law under SB 330 (as made permanent by AB 130), which requires the replacement of any "protected" affordable or rent-stabilized units that are demolished or withdrawn, ensuring no net loss of housing for lower-income households.[3]

Moreover, the Project actively increases residential density and concentrates growth in transit-served, low-VMT areas, which is the primary basis for concluding that the impacts would be less than significant. These factors indicate that the project-generated VMT impact is likely to fall below the City's significance threshold (15% below regional average VMT per capita). In other words, adding denser housing in Mountain View's infill locations is expected to reduce average VMT per capita, resulting in a ***less-than-significant*** project-level VMT impact under CEQA.

Cumulative VMT Impact

Under cumulative conditions, the effect of adding thousands of new homes is nuanced. On one hand, the Project will improve the jobs-housing balance and promote infill development-both of which reduce VMT per capita compared to the adopted cumulative scenario. On the other hand, the sheer scale of growth (up to 10,000 to 16,000 new units and residents) means that total (or "boundary") VMT in the region may still increase in absolute terms.

There are also uncertainties-such as the exact locations of future development, evolving travel behavior; emerging technologies that reduce resistance to driving; and future transit and other infrastructure improvements-that could influence per-capita VMT in unpredictable ways.

Given Mountain View's threshold of no net increase in cumulative boundary VMT (that is, VMT on all roadways in the region), even a small increase in total VMT would constitute a significant cumulative impact. In the absence of project-specific travel modeling, the City has taken a conservative approach: it concludes that the R3 Project could make a cumulatively considerable contribution to regional VMT under future conditions.

This determination aligns with the City's General Plan EIR, which found buildout of planned growth (now augmented by this project) would result in significant and unavoidable cumulative transportation impacts.

[3] California State Legislature; SB 330 (Housing Crisis Act of 2019) and AB 130 (Budget Act of 2021) Housing Unit Replacement Requirements, 2019 & 2021.

Therefore, for purposes of CEQA, the cumulative transportation impact of the Project is considered ***potentially significant.***

Plan Consistency: The Project was also reviewed for consistency with adopted plans and policies. It was found to support the objectives of regional and local plans by focusing growth near transit and existing infrastructure. The R3 update does not conflict with any transportation or land use plans (such as Plan Bay Area 2050, VTA's countywide plans, or Mountain View's General Plan policies); no significant plan inconsistencies were identified.

VMT Mitigation Strategy

Although a legislative act like a zoning code update cannot include on-site mitigations, the City can continue to address cumulative VMT impacts through its adopted VMT Policy and project-level review process. The mitigation strategies outlined below fall within the City's existing VMT mitigation framework and are designed to reduce per-capita VMT over time:

Tier 1 – Project Characteristics

Encouraging increased residential density—as envisioned by the R3 Project—can reduce VMT per capita by shortening trip distances and supporting alternative transportation modes. Additional strategies include:

- Promoting mixed-use development.
- Including affordable or below-market-rate housing to reduce displacement and keep lower-income residents near jobs.

Example: Strengthening the jobs-housing linkage through updated linkage fees and advancing affordable housing and anti-displacement measures to reduce long commutes and regional VMT.

Tier 2 – Multi-Modal Network Improvements

Implement infrastructure that supports walking, biking, and transit use. This includes:

- Bicycle lanes, pedestrian upgrades, traffic calming, and enhanced transit access.
- Coordinating with City staff to prioritize projects already identified in adopted City plans.

Example: Expanding transit and active transportation options in R3 areas to maintain low per-capita VMT as the population grows.

Tier 3 – Parking

Use parking policies known to reduce VMT, such as:

- Right-sizing parking supply.
- Expanding end-of-trip bicycle facilities.
- Pairing reduced on-site parking with residential permit programs in surrounding neighborhoods.

Tier 4 – Travel Demand Management (TDM)

Deploy TDM measures to reduce reliance on single-occupancy vehicles, including:

- School and work carpools, bike-share, car-share, and trip reduction campaigns.
- Parking cash-out, subsidized transit, telecommuting, alternative work schedules, and employer shuttles.
- Paid or unbundled parking and vanpool subsidies.

Example: Requiring TDM measures in new R3 housing—such as transit subsidies, car-share programs, and unbundled parking—to reduce vehicle use. These efforts can be paired with adaptive management strategies that monitor VMT trends and adjust policies as needed to meet long-term reduction goals.

Although the Project is subject to AB 130 housing mitigation fee requirements, payment of this fee alone would not reduce the Project's cumulative VMT impact to a less-than-significant level under CEQA. Because CEQA requires mitigation to be specific, enforceable, and demonstrably effective, reliance on the AB 130 fee cannot eliminate the Project's potentially significant cumulative transportation impact.[4,5]

Consistent with the City's General Plan EIR, the key long-term strategy for reducing cumulative VMT remains facilitating additional infill housing especially near transit and in low-VMT areas alongside the City's existing and ongoing VMT policy.

Through the above strategies, Mountain View can substantially lessen the Project's cumulative VMT impact. Many of these measures are already embedded in City policy or regional programs, and rigorous implementation will be essential. With aggressive mitigation and continued alignment with Plan Bay Area's Transit-Oriented Communities policies, the additional housing growth from the Project can likely be accommodated without increasing per-capita VMT in the long term.

Nevertheless, given the uncertainties discussed, the cumulative VMT impact is classified as a significant and unavoidable impact with mitigation. The City's proactive commitment to mitigation will be critical to ensure the Project ultimately furthers a reduction in regional VMT while providing much-needed housing.

[4] Cox, Castle & Nicholson LLP; Another Fee-Based Approach to CEQA Mitigation? California Creates New Mitigation Option for Vehicle Miles Traveled but Significant Questions Remain, January 22, 2025.

[5] Elisa Barbour; Repurposing Impact Fee Programs Since Adoption of SB 743, University of California Institute of Transportation Studies, 2022.

1. Introduction and Project Description

The City of Mountain View is advancing a citywide zoning code amendment to modernize its R3 residential zoning districts and support higher-density housing in strategically selected areas. This initiative is known as the R3 Zoning District Update, stems from the City Council's FY 2019–21 goal to "review and propose revisions to the R3 Zone standards that consider form-based zoning, incentivizing stacked flats, and updated rowhouse guidelines" (*City of Mountain View, Notice of Preparation of a Draft EIR, 2025*).

The update is designed to expand housing options while aligning with General Plan policies and complying with recent state housing legislation.

This Transportation Analysis evaluates the environmental implications of the proposed zoning changes under the California Environmental Quality Act (CEQA). Following the December 2018 guideline amendments, vehicle miles traveled (VMT), is now the required metric for assessing transportation impacts. In response, the City of Mountain View adopted a citywide VMT policy and released its *Multimodal Transportation Analysis (MTA) Handbook* in June 2020. Guided by these frameworks and the legislative intent of Senate Bill 743, this TA provides a qualitative infill housing VMT assessment, VMT-focused assessment of the Project's potential direct, indirect, and cumulative transportation impacts.

Purpose

The primary purpose of this transportation analysis is to evaluate the Project's transportation impacts in compliance with CEQA. Specifically, the analysis identifies potential transportation impacts-both direct and cumulative-and recommends mitigation measures for inclusion in the Environmental Impact Report (EIR).

This report includes:

- A plan consistency analysis, comparing the Project against relevant regional, county, and local transportation plans.
- A qualitative infill housing VMT impact assessment, examining how the Project may influence vehicle travel patterns across Mountain View.

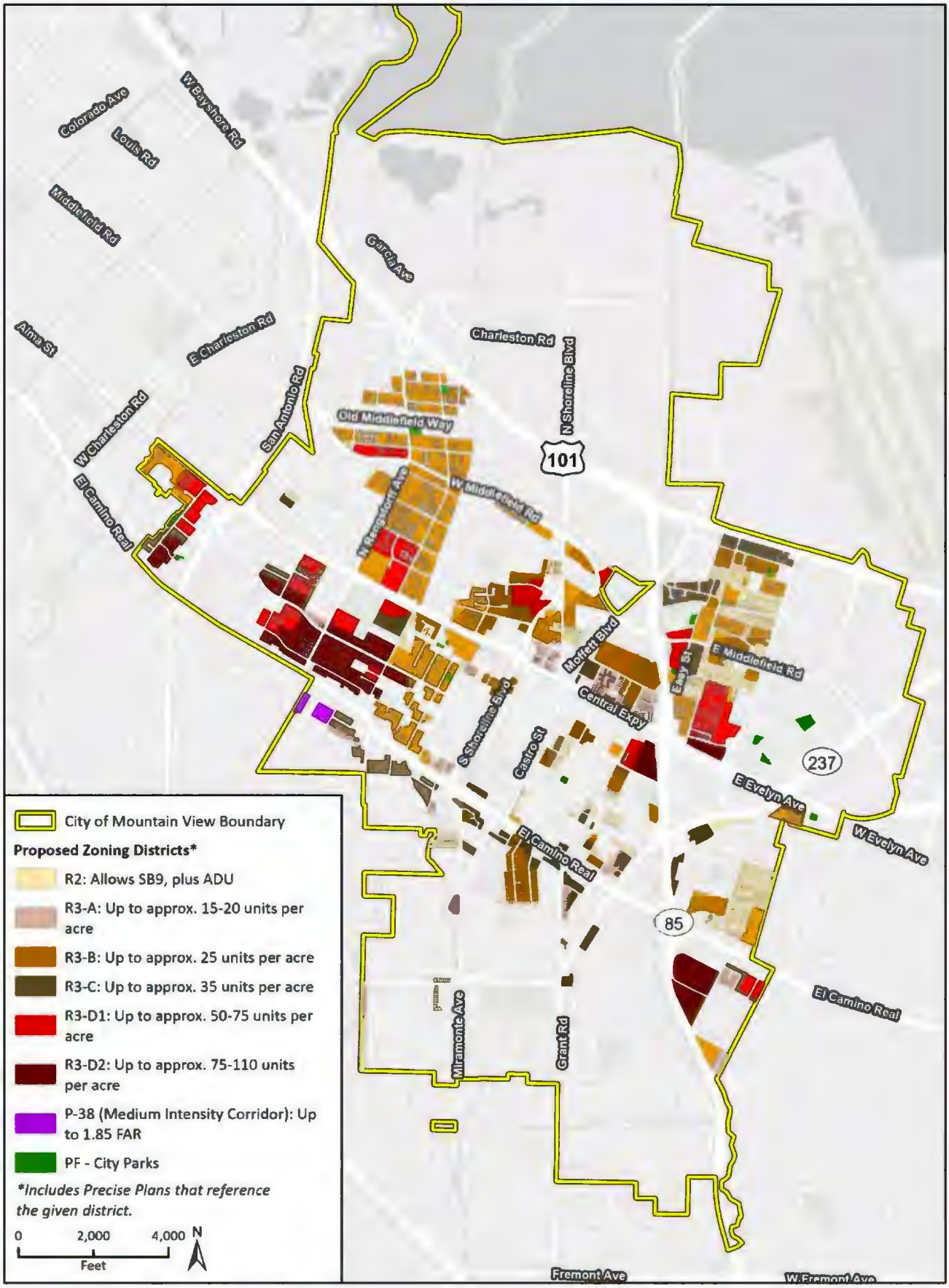
The analysis follows the latest CEQA guidelines, including the 2018 amendments that designate Vehicle Miles Traveled (VMT) as the required metric for transportation impact evaluation. It was developed in coordination with City of Mountain View staff and guided by the City's adopted VMT policy and Multimodal Transportation Analysis (MTA) Handbook.

Project Location

The Project study area encompasses approximately 1,260 acres across about 8,350 parcels citywide in Mountain View, Santa Clara County. The affected R3-zoned or R3-rezoning parcels are infill locations distributed throughout the city; "infill" means these locations have previously urbanized, and they are surrounded by a mix of uses, including a significant number of jobs. The area is roughly bounded to the north by West Bayshore Road/US 101 and Palo Alto, to the west by Los Altos, to the east by Sunnyvale, and extends to several blocks south of El Camino Real on the south. Most parcels

proposed for upzoning lie within the city's existing urbanized footprint and are outside of the designated "Change Areas" established in the *Mountain View 2030 General Plan* (which identified certain areas for growth and densification).

Figure 1 shows the locations of the proposed R3 zoning changes across the city of Mountain View.



Source: City of Mountain View, 2025.

FIGURE 1

Project Location

Project Description

The Project proposes a new tiered R3 multifamily zoning (R3-A, R3-B, R3-C, R3-D1, R3-D2) with densities ranging from 15–110 du/ac. For example, existing R2 sites (≈12 du/ac) could become R3-A (15–20 du/ac) or R3-B (25 du/ac), while larger R3-C to R3-D zones allow 35–110 du/ac. These proposed land use densities are illustrated in **Table 1.**

Current realistic development capacity in R3 areas is roughly 2,000–3,500 units, based on the allowed density and potential redevelopment at under-utilized sites. The zoning update would roughly create five times more development capacity (to on the order of 10,000–16,000 units citywide) by adding housing on key corridors and redeveloping large, underutilized lots. For this analysis, it is assumed the increased capacity is built out over the 25–30-year horizon. Other uses (e.g., small-scale retail or community facilities) may accompany housing, but the Project's focus is residential.

The Project incorporates Council priorities for diverse housing and strong pedestrian design. It integrates Housing Element Programs (e.g., upzoning some R2 lots into R3 lots, allowing SB 9 splits, protecting existing multifamily).

The Project aligns with the Housing Accountability Act (Gov. Code § 65589.5, enacted 1982), which limits local denial or reduction of density for housing that meets objective standards, and with the State Density Bonus Law (Gov. Code § 65915, enacted 1979), which requires cities to grant additional density, incentives or concessions, waivers or reductions of development standards, and reduced parking for qualifying projects. By streamlining approvals and codifying objective design rules, the Project expedites residential development and materially increases feasible housing density citywide.

Table 1: Proposed Land Use Densities

Zoning District	Allowable Density (du/ac)	Description
(Amended R-2)	12 (unchanged)	R-2 lots may allow SB 9 lot splits and more ADUs
R3-A	15 – 20	Moderate-density for current R-2R2 zones, careful transition zones
R3-B	25	Established medium density areas (townhomes, fourplexes)
R3-C	35	Established medium-high density areas (existing multi-unit sites)
R3-D1	50 – 75	Mid-rise multifamily neighborhoods (transit-rich arterials)
R3-D2	75 – 110	High-density stacked flats, tallest mixed-use sites (e.g., major transit corridors)

Source: City of Mountain View. (2025, July 9). *Notice of preparation of an EIR for the R3 Zoning District Update Project*. Fehr & Peers, 2025.

Changes to CEQA Transportation Analysis

Senate Bill (SB) 743 changed how transportation impacts under CEQA are analyzed. SB 743 removed the use of automobile delay or traffic congestion for determining transportation impacts in environmental review. The latest *CEQA Statute & Guidelines* now specify that VMT is the appropriate metric to evaluate transportation impacts.[6] In short, SB 743 changes the focus of transportation impact analysis in CEQA from measuring impacts to drivers to measuring the impact of driving.

In June 2020, the City of Mountain View adopted a citywide VMT policy and released its Multimodal Transportation Analysis (MTA) Handbook. Together, these documents establish the methods and procedures that applicants must follow to evaluate a project's VMT and multimodal effects in conformance with SB 743. The VMT Policy identifies VMT thresholds of significance, screening criteria, and mitigation options for CEQA review. The MTA Handbook provides a clear, consistent technical approach for assessing whether land use or transportation projects result in adverse or beneficial impacts on Mountain View's transportation system and services, including vehicle, transit, bicycle and pedestrian modes. Development projects in the City, including those under these code updates, will be required to show compliance with the Citywide VMT Policy and (if they meet size thresholds) the MTA Handbook requirements.

Report Organization

This report is divided into five chapters:

- **Chapter 1 – Introduction and Project Description** includes the TA purpose, Project description, summary of the proposed Land Use program, description of recent changes to CEQA transportation analysis, and the organization of the report.
- **Chapter 2 – VMT Approach and Analysis Methods** addresses the selection of a qualitative infill housing VMT approach, thresholds, and analysis tools in accordance with SB 743, and local policy to describe how those methods are applied to the impact analysis.
- **Chapter 3 – Existing Conditions** includes a brief description of the existing transportation facilities in the City of Mountain View such as Pedestrian, Transit, Bicycle, and Roadway Facilities
- **Chapter 4 – Summary of Relevant Regional Circulation and Transportation Plans** provides background information to be used for the plan consistency evaluation.
- **Chapter 5 – Significance Criteria** describes the criteria used to assess the VMT impact and other transportation-related items.
- **Chapter 6 – Environmental Impacts and Mitigation Assessment** determines the significance of each impact and presents feasible mitigation measures or project features to avoid, minimize, or offset those impacts.

[6] On September 27, 2013, Governor Jerry Brown signed SB 743 into law and started a process intended to fundamentally change transportation impact analysis as part of CEQA compliance. Following several years of draft proposals and related public comments, OPR settled upon VMT as the preferred metric for assessing passenger vehicle-related impacts and issued revised *CEQA Statute & Guidelines* in December 2018, along with a *Technical Advisory On Evaluating Transportation Impacts in CEQA* (December 2018) to assist practitioners in implementing the *CEQA Statute & Guidelines* revisions. Under the revised *CEQA Statute & Guidelines*, vehicle level of service (LOS) is no longer to be used as a determinant of significant environmental impacts, and analysis of a project's impacts will now be based on assessment of VMT. As of July 1, 2020, all transportation analysis performed under CEQA must be consistent with the revised *CEQA Statute & Guidelines*.

2. VMT Approach and Analysis Methods

This section sets a precedent for the VMT Approach and Analysis method chosen for this project by detailing background on the Use of CEQA Prior to SB 743, an Overview of Senate Bill 743 and Legal Framework, and a Summary of California's VMT Mapping and VMT Modeling to illustrate the reasoning for selecting a qualitative infill housing VMT assessment for the Project.

Use of CEQA Prior to SB 743

CEQA was enacted in 1970 with the goal of providing a mechanism for disclosing to the public the environmental impacts of proposed actions. Before taking a discretionary action, lead agencies (such as the City of Mountain View) must determine if that action is subject to CEQA and conduct a review of the effects of that action on the physical environment. The State Office of Planning and Research (OPR), now referred to as the Governor's Office of Land Use and Climate Innovation (LCI), prepared and maintains guidelines to help agencies implement CEQA.

Under CEQA, lead agencies must determine whether a proposed project has the potential to cause significant environmental impacts. This determination must be based, to the extent possible, on factual data and scientific methods of analysis. The Project's effect on transportation is one of the areas that must be analyzed. For many years, the City of Mountain View used vehicle Level of Service (LOS) as the primary measure to evaluate a project's effect and determine transportation impacts.

LOS is a qualitative description of vehicular traffic flow based on factors such as speed, travel time, delay, and freedom to maneuver. The calculation of vehicle LOS is typically done through the application of specialized software and is based on traffic counts, observations of vehicle interactions, lane assignments, and data about traffic signal operations (at those intersections that are signalized).

Mitigating a LOS impact may involve making changes to the physical transportation system in order to accommodate additional vehicles and reduce delays. These mitigations may involve actions such as installing traffic signals, adding turn lanes, widening roads, or contributing to the construction of HOV/Express Lanes, among other options.

Overview of Senate Bill 743 and Legal Framework

On September 27, 2013, Governor Jerry Brown signed SB 743, initiating a fundamental change in how transportation impacts are evaluated under CEQA. the legislation directed the State of California's OPR to look at different metrics for identifying transportation impacts and make corresponding revisions to the *CEQA Statute & Guidelines*. The initial bill includes two legislative intent statements (emphasis and bullets added):

> ***New methodologies*** *under the California Environmental Quality Act are* ***needed for evaluating transportation impacts*** *that are better able to promote the state's goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations.*

> *More appropriately, balance the needs of congestion management with statewide goals related to **infill development**, promotion of public health through **active transportation**, and **reduction of greenhouse gas emissions**.*

These statements are important because they provide direction to OPR and to lead agencies. For OPR, the direction is largely about what the new metrics should achieve. For lead agencies, the direction is about expected changes in transportation analysis (and related technical areas) and what factors to consider for significance thresholds.

To implement this shift, the revised *CEQA Statute & Guidelines* issued in December 2018 established vehicle miles traveled (VMT) as the primary metric for evaluating transportation impacts. Level of Service (LOS), which measure congestion and delay, is no longer considered a significant environmental impact under CEQA. As of July 1, 2020, all CEQA transportation analyses must be based on VMT.

OPR also released a Technical Advisory to assist lead agencies with applying SB 743. The guidance identifies VMT as the preferred measure but leaves agencies discretion in selecting thresholds, methods, and mitigation strategies. This document builds on that framework by describing how the City of Mountain View applies VMT metrics, analysis methods, and significance thresholds to the R3 Code Update.

Based on the background context outlined above, the remainder of this document provides information about key decisions the City of Mountain View has made regarding VMT metrics, calculation methods, impact thresholds, and impact mitigation.

Summary of California's and Santa Clara County's VMT Mapping and VMT Modeling

California agencies rely on two broad approaches to forecast or estimate VMT. VMT forecasts are generated using various forms of travel forecasting models that range from simple spreadsheets based on historic travel trends to complex computer models that account for numerous factors influencing travel demand. Possible travel forecasting models/tools include the following:

- **Travel Forecasting Models**: A travel forecasting model is a computer model used to estimate travel behavior for a specific horizon year based on land use and transportation network supply inputs. VMT is one output of a travel forecasting model run. The Caltrans Statewide Travel Forecasting Model, Metropolitan Transportation Commission (MTC) Regional Travel Forecasting Model, VTA-C/CAG Bi-County Travel Forecasting Model, and City of Mountain View Travel Model are all examples of travel forecasting models.

  A well-chosen model offers three key advantages:

  - Consistency across analyses. The same platform that supports threshold setting can evaluate project-level and cumulative effects, delivering an "apples-to-apples" comparison that CEQA requires.
  - Network and behavior sensitivity. Models account for congestion, transit options, and induced demand, so they can test whether a new lane, transit line, or land use mix shifts total VMT.
  - Scalability to future conditions. Base-year and horizon-year scenarios reveal both near-term and long-term impacts.

Proper use demands careful calibration and validation within the study area. Model boundaries must cover full trip lengths to avoid misrepresenting inter-regional travel, and traffic analysis zones (TAZs) may need to be split when parcel-level detail matters.

- **Non-Model "Accounting Methods:"** When a travel model is not available or not appropriate, VMT can be estimated using sketch models and spreadsheet methods. VMT can also be estimated directly by multiplying the number of trips by an average trip length. Trips can be estimated using the results of local trip generation surveys or trip generation rate data published by the Institute of Transportation Engineers (ITE). Trip lengths can be extracted from models or from standardized averages or travel pattern data from the regional or sub-regional planning organization. Using trip length averages does not consider changes to the roadway network or traffic congestion, or the Project's potential effects on overall travel patterns. These non-model "accounting methods" could also be paired with a travel model and used between major model updates or to estimate project generated VMT for small projects that would "get lost" in a travel model. The Santa Clara Countywide VMT Evaluation Tool (SCC VMT Tool) is an example of a VMT screening tool that uses outputs from a travel forecasting model and conducts off-model VMT reduction calculations to test potential transportation demand management strategies to reduce VMT. For threshold setting, the SCC VMT Tool is the only sketch tool that provides calibrated citywide or regionwide VMT estimates; most other tools focus on project-level metrics, percent changes, and mitigation effect sizes

Fehr & Peers reviewed the sketch-level tools commonly used for CEQA; **Appendix A** summarizes each tool's purpose, inputs, outputs, and typical Bay Area use. UC Davis and UC Berkeley independently evaluated a suite of sketch tools and documented what they produce, how they work, and where they are most appropriate.[7,8] Reported outputs extend beyond project VMT to include mode shares, fuel use, transportation emissions, and household cost indicators.

The academic research highlights built-environment sensitivity in tools such as Sketch7, which estimates household VMT per capita and total VMT using inputs that reflect the "7 Ds." Technical and legal defensibility improves when sketch results are benchmarked to the local or regional travel model used for threshold setting and when analysts document assumptions, data sources, geographic context, and limits of transferability.[3]

[7] Elisa Barbour, Dan Chatman, Sarah Doggett, Stella Yip, and Manuel Santana; *SB 743 implementation: Challenges and Opportunities* [Draft Final], June 5, 2018.

[8] Lee, A., Fang, K., & Handy, S. (2017). *Evaluation of sketch-level VMT quantification tools: A Strategic Growth Council grant programs evaluation support project.* National Center for Sustainable Transportation, UC Davis. https://escholarship.org/uc/item/08k3q8m5

Table 2 below details the strengths and limitations of each approach and lists typical examples.

Table 2: California's VMT Estimation Approaches

Approach	Typical Tools	Strengths	Key Limitations
1. Travel-forecasting models	Caltrans Statewide Model, regional MPO models, VTA Bi-County model	Consistent platform for thresholds and project analysis, network sensitivity, horizon-year scalability	Require calibration and validation, large study areas, technical expertise
2. Non-model accounting and sketch methods	Trip-rate × length spreadsheets, CalEEMod, MXD+, SCC VMT Tool hybrid	Fast, transparent, cost-effective, good for screening	Static averages, limited network feedback, less reliable for cumulative analysis

Source: Fehr & Peers, 2025.

Complementing that tool-by-tool view, San José State University's Mineta Transportation Institute (MTI) analyzed consistency across common VMT tools in California. MTI clusters methods into families and shows that results are sensitive to each tool's design and data vintage. Static calculators can be fast and transparent but may not adapt to evolving scenarios, while integrated platforms like VisionEval are more robust for policy analysis, at the cost of complexity and data needs[9]. MTI recommends improving access to validated datasets, fostering context-sensitive tools, and adopting an integrated approach in which sketch tools are benchmarked to regional models and used for screening between model update cycles. In addition, MTI found that many calculators draw on 2019 data, and users should document post-pandemic trends to more accurately portray shifts in travel patterns. These practices strengthen reproducibility and credibility for CEQA, especially when agencies ensure full trip-length coverage and consistent metrics from threshold setting through project analysis.

These findings directly inform the methodology used in this assessment. Because the Project is too broad and uncertain for a single modeling platform to capture reliably, we apply MTI's recommended integrated approach by combining qualitative, policy-based evaluation with evidence from regional models and screening tools. This ensures the analysis remains grounded in the best available data while still accounting for evolving land use patterns and the interaction between new housing, trip length, and regional VMT outcomes. Building on this foundation, the following section explains how both the differences between modeling and non-modeling approaches informed the qualitative infill housing VMT assessment used in this analysis.

Modeling and Non-Modeling Approaches

Using a travel forecasting model has some advantages over other methods, such as using sketch models or spreadsheet tools, because a travel model is better able to account for both project-generated VMT and the Project's effect on total area-wide VMT. A spreadsheet tool cannot evaluate project's effect on VMT. Both project-generated and the Project's effect on total VMT are important in a CEQA analysis.

[9] Alexander, S. E., Tanvir, S., Ahmed, S. T., & Jones, A. (2024). *Consistent VMT mapping and modeling in California: How can we better assess the VMT impacts of state and local transportation projects?* Mineta Transportation Institute. https://transweb.sjsu.edu/research/2314

The Santa Clara Countywide VMT Evaluation Tool relies on outputs from the Santa Clara Valley Transportation Authority (VTA)–City/County Association of Governments of San Mateo County (C/CAG) Bi-County travel model (VTA Travel Model), which provides regional coverage and calibrated trip lengths consistent with CEQA guidance. The OPR Technical Advisory emphasizes that VMT analyses should not truncate trips at jurisdictional boundaries and should reflect a "good faith effort at full disclosure" (CEQA Guidelines, § 15151). However, like other travel models, it aggregates land uses at the transportation analysis zone (TAZ) level and does not provide parcel-level sensitivity. This limits its usefulness for a citywide rezoning where development patterns are uncertain, but it still offers a valid benchmark for evaluating project consistency with regional averages and thresholds.

The OPR *Technical Advisory* states that sketch-level models may be used for project VMT analysis if the trip lengths are replaced with those from the local or regional model that was used to establish the lead agency's VMT thresholds. The VTA model and the SCC VMT Tool are not structured to accept the wide range of potential land use inputs that a rezoning of 10,000 to 16,000 new housing units may entail. To be fully consistent, the trip generation estimates of the sketch model would also have to be replaced. Unfortunately, most travel forecasting models do not use typical project land uses as trip generation inputs, making this substitution difficult.

As an additional source, MTI recommends a 'right-sized' hierarchy which uses a regional activity-based model when available. If this is unavailable, the institute recommends utilizing a locally benchmarked spreadsheet or sketch tool for screening. No single platform is the best practice statewide, tool selection should match project scale, context, and data availability.

For compliance with SB 743, the preferred hierarchy is:

1. A calibrated, validated travel forecasting model that captures full trip lengths.
2. A sketch or spreadsheet method benchmarked to that same model.
3. Simple accounting only when neither of the above are feasible and the limitations are disclosed.

While regional travel models and benchmarked sketch tools provide important context, the scale and uncertainty of a citywide rezoning effort requires an alternative approach, which is why the following section explains the justification for using a non-modeling qualitative infill housing VMT methodology.

Infill Housing VMT Assessment Rationale

The City of Mountain View has chosen to proceed with a qualitative infill housing VMT assessment that can be sensitive to the Project's unique characteristics–particularly the uncertainty around the amount and location of future housing. Our approach evaluates existing conditions using descriptive methods, contextual analysis, and substantial evidence to assess potential VMT impacts, and the full approach can be seen in **Appendix B**. This analysis will evaluate the Project's impact on vehicle-miles traveled using a qualitative, non-model approach. Instead of relying on a single forecast model, the analysis will draw on descriptive evidence, policy context, and peer-reviewed research to understand how location, density, housing mix, and affordability shape travel behavior, and subsequently VMT. This approach is also informed by regional best practices, including the Metropolitan Transportation Commission's *Establishing An Infill and Affordable Housing Screen* memorandum, which outlines how higher-density infill projects can meaningfully reduce VMT and provides substantial evidence for screening criteria based on project density, proximity to amenities, and inclusion of affordable housing. The full paper is included in

Appendix C. The framework utilizes relevant regional plans and current VMT mapping and modeling practices to develop project-level and cumulative impact findings and identify mitigation strategies where necessary.

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. The SCC VMT Tool and other sketch methods were designed for discrete, fixed-location projects; they cannot capture how thousands of potential units across the City might change trip patterns or interact with regional growth. Given these scale and data limitations, a qualitative infill housing VMT assessment provides the "good faith" disclosure CEQA requires while allowing analysis to remain sensitive to factors the models may overlook, such as affordable-housing retention, demographic change, and evolving travel technology.

Use of the SCC VMT Tool and Map-Based Screening

The SCC VMT Tool, developed by VTA and countywide partners, is the standard screening method used by Mountain View and neighboring jurisdictions to evaluate project-generated VMT. It is particularly effective for small projects that align with existing development patterns and are located in areas where cumulative VMT trends are declining.

Limitations for Citywide Zoning Actions

While the SCC VMT Tool is effective for evaluating individual sites, its design is less suited to a citywide zoning action that could reshape development patterns over the long term. The tool relies on VTA travel model outputs for a single forecast year, applies transportation analysis zone-level averages, and does not fully capture how dispersed new housing units might interact with other regional growth over time.

For this reason, the SCC VMT Tool is treated as one line of evidence in this analysis rather than the sole determinant of impacts. The qualitative infill housing VMT assessment presented below complements the SCC VMT Tool by accounting for broader factors such as affordability protections, cumulative housing growth, and policy consistency.

Use of Contextual and Descriptive Analysis

The qualitative infill housing VMT assessment utilizes multiple lines of evidence to evaluate the Project's potential VMT impacts on the City's transportation network. This contextual analysis does the following:

1. Evaluate policy consistency by:
    - Summarizing relevant regional transportation and circulation plans.
    - Comparing the proposed zoning update with Plan Bay Area 2050, Mountain View's General Plan, and VTA's regional models.
    - Reviewing California's current VMT mapping and modeling practices, including their limitations for large-scale zoning updates.
2. Citing academic and policy research that supports the use of qualitative methods for infill housing VMT analysis. Determine the initial VMT impact by:
    - Describing how increased residential density and infill development may shift local and regional VMT.

- Accounting for potential displacement of affordable housing that could offset VMT benefits.
- Assessing alignment with regional strategies such as Plan Bay Area[10] and the TOC Policy[11].

3. Analyze cumulative VMT effects by:
    - Incorporating metrics such as jobs-to-housing ratios, and linkage fees.
    - Framing results within broader socioeconomic factors like population out-migration, increased ride-share use, and declining transit ridership.
4. Develop mitigation strategies by:
    - Identifying feasible, project-related measures that emphasize infill development, support transit and active transportation, and address displacement risks.
    - Defining feasibility under CEQA in terms of economic, legal, and social considerations.
    - Tailoring strategies tailored to the scope of the zoning update.
5. Reach a final VMT impact determination by:
    - Integrating anticipated mitigation outcomes with emerging trends in travel behavior, technology, and demographics.
    - Acknowledging forecasting limitations due to data constraints and uncertain future conditions.
6. Address non-VMT considerations by:
    - Evaluating consistency with existing plans and policies.
    - Noting current constraints that limit analysis of safety, hazards, and emergency access until more detailed project definitions are available.

These steps help identify where VMT could increase, acknowledge any uncertainties in this analysis, and support targeted mitigation-such as improved transit access, active-transportation investments, and anti-displacement measures-without relying on a project-specific travel model.

[10] Metropolitan Transportation Commission & Association of Bay Area Governments. (2021, October 21). *Plan Bay Area 2050: Final plan for housing, economic development, transportation, and environmental resilience* [Long-range regional plan]. PlanBayArea.org. Retrieved July 2025 from https://planbayarea.org/finalplan2050

[11] Metropolitan Transportation Commission. (2022). *Transit-Oriented Communities (TOC) Policy* [MTC Resolution No. 4530]. Metropolitan Transportation Commission. Retrieved July, 2025 from https://mtc.ca.gov/planning/land-use/transit-oriented-communities-toc-policy

3. Existing Conditions

The following section briefly describes the existing transportation conditions in the City of Mountain View, setting up the context for evaluating potential impacts of the Project in accordance with CEQA. It describes the available public transit services, the local and regional street network, and existing bicycle and pedestrian infrastructure.

Existing Transit System

Mountain View is served by an integrated network of transit agencies, including the Santa Clara Valley Transportation Authority (VTA), Caltrain, and local shuttles. Together, these services offer connections within the city and across the county.

Fixed-Route Bus

VTA provides local, express, and rapid bus service throughout Mountain View, including frequent connections along El Camino Real which the 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 and are free to the public, improving first and last mile transit access.

These transit services are listed in greater detail, including destination, schedule, and frequency, below in **Table 3**.

Table 3: 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: Santa Clara Valley Transportation Authority (VTA). Frequency Chart, April 28, 2025.
Mountain View Transportation Management Association (MTMA). MVgo.org, 2025.
City of Mountain View. MV Community Shuttle (mvcommunityshuttle.com), 2025.
Fehr & Peers, 2025.

Existing Roadway System

Mountain View is served by a well-developed network of regional highways and local arterials. Regional connectivity is provided by U.S. Highway 101 (US 101), State Route 85 (SR 85), and State Route 237 (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 (State Route 82), Shoreline Boulevard, Middlefield Road, and Moffett Boulevard. These routes provide primary access to and through the R3 zoning areas.

Key roadways include:

- **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 I-880 in Milpitas. It transitions from express lanes east of Mathilda Avenue to mixed-use 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 Miramonte Avenue and 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.

Existing Bicycle Infrastructure

Mountain View maintains a citywide bikeway network made up of several facility types that support both recreational and utilitarian cycling.

- **Class I Multi-Use Paths** offer fully separated facilities for bicyclists and pedestrians. Notable Class I trails 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. Examples of Class IV bike lanes in Mountain View include ECR between Sylvan Avenue and Rengstorff Avenue and California Street from Showers Drive to Shoreline Boulevard.

Existing Pedestrian Network

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.

4. Summary of Relevant Regional Circulation and Transportation Plans

This chapter provides a summary of regional circulation and transportation plans that are relevant to the Project. The *Metropolitan Transportation Commission's (MTC) Regional Transportation Plan* provides a roadmap for accommodating projected household and employment growth in the nine-county Bay Area by 2040 as well as a transportation investment strategy for the region. The *Santa Clara Valley Transportation Authority (VTA) Valley Transportation Plan (VTP) 2040* identifies all major projects in Santa Clara Valley over the next 20 years. 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 *Congestion Management Program Monitoring and Conformance Report* sets state and federal funding priorities for transportation improvements affecting the Santa Clara County Congestion Management Program (CMP) transportation system.

The *City of Mountain View General Plan 2030* includes mobility goals aimed at enhancing travel by all modes by encouraging use of non-auto modes and thus reduce vehicle trips. *AccessMV: Comprehensive Modal Plan* is a multimodal plan to provide a consistent vision for the city's multimodal transportation network. The *Mountain View Vision Zero Policy* is a policy to eliminate fatal traffic collisions in Mountain View by 2030. The Project builds upon the General Plan's goals and policies for the City of Mountain View and updates land use and zoning regulations to improve residential density and support the City's RHNA housing allocation.

Metropolitan Transportation Commission's (MTC) Regional Transportation Plan (Plan Bay Area)

Plan Bay Area 2050 is a joint regional planning document overseen by the MTC 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 RTP (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 GHG 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. The following strategies are included:

- Housing Strategies
    - Protect and Preserve Affordable Housing
        - H1. Further strengthen renter protections beyond state law
        - H2. Preserve existing affordable housing
    - Spur Housing Production for Residents of All Income Levels
        - H3. Allow a greater mix of housing densities and types in Growth Geographies
        - H4. Build adequate affordable housing to ensure homes for all
        - H5. Integrate affordable housing into all major housing projects

        - H6. Transform aging malls and office parks into neighborhoods
    - Create Inclusive Communities
        - H7. Provide targeted mortgage, rental, and small business assistance to Equity Priority Communities
        - H8. Accelerate reuse of public and community-owned land for mixed-income housing and essential services
- Economic Strategies
    - Improve Economic Mobility
        - EC1. Implement a statewide universal basic income
        - EC2. Expand job training and incubator programs
        - EC3. Invest in high-speed internet in underserved low-income communities
        - Shift the Location of Jobs
        - EC4. Allow greater commercial densities in Growth Geographies
        - EC5. Provide incentives to employers to shift jobs to housing-rich areas well served by transit
        - EC6. Retain and invest in key industrial lands
- Transportation Strategies
    - Maintain and Optimize the Existing System
        - T1. Restore, operate, and maintain the existing system
        - T2. Support community-led transportation enhancements in Equity Priority Communities
        - T3. Enable a seamless mobility experience
        - T4. Reform regional transit fare policy
        - T5. Implement per-mile tolling on congested freeways with transit alternatives
        - T6. Improve interchanges and address highway bottlenecks
        - T7. Advance other regional programs and local priorities
    - Create Healthy and Safe Streets
        - T8. Build a Complete Streets network
        - T9. Advance regional Vision Zero policy through street design and reduced speeds
        - Build a Next-Generation Transit Network
        - T10. Enhance local transit frequency, capacity, and reliability
        - T11. Expand and modernize the regional rail network
        - T12. Build an integrated regional express lanes and express bus network
- Environmental Strategies
    - Reduce Risk from Hazards
        - EN1. Adapt to a sea level rise
        - EN2. Provide means-based financial support to retrofit existing residential buildings
        - EN3. Fund energy upgrades to enable carbon neutrality in all existing commercial and public buildings
    - Expand Access to Parks and Open Space
        - EN4. Maintain urban growth boundaries
        - EN5. Protect and manage high-value conservation lands
        - EN6. Modernize and expand parks, trails, and recreation facilities

- Reduce Climate Emissions
    - EN7. Expand commute trip reduction programs at major employers
    - EN8. Expand clean vehicle initiatives
    - EN9. Expand transportation demand management incentives

Major transit projects included in Plan Bay Area 2050 include a BART extension to San José/Santa Clara, Caltrain electrification, enhanced service along the Amtrak Capitol Corridor, and expanded local and express bus services.

MTC Transit-Oriented Communities (TOC) 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 that local governments must address: 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 Valley Transportation Authority VTP 2040 Plan

Santa Clara Valley Transportation Authority (VTA), the countywide transportation authority, has adopted the *Valley Transportation Plan (VTP) 2040* (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 rail crossing and improve safety; and the Citywide Traffic Signal Upgrade and IP Traffic Signal Access project which is identified in VTP 2040 as a long-term goal. The Project proposes replacing outdated signal controllers and deploying new software and internet-based communications to enhance

citywide traffic management. Together these planned investments support VTP 2040 goals for faster transit, reliable express lanes, and safer multimodal travel within Mountain View.[12]

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 Report

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 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* (summer 2018). The long-range countywide transportation plan and how projects compete for funding and prioritization are documented in the *Valley Transportation Plan (VTP) 2040* (adopted in October 2015).

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 (TIF) 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, GHG emissions and air quality, and vehicles and roadway stye efficiency. The goal and policies for Land Use Mix, Distribution, and Intensity are listed below:

[12] Santa Clara Valley Transportation Authority. (2014). Valley Transportation Plan 2040 (VTP 2040). San Jose, CA: Santa Clara Valley Transportation Authority.

- **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 3.3**: Health. Promote community health through land use and design.
- **LUD 3.4**: Land use conflicts. Minimize conflicts between different land uses.
- **LUD 3.5**: Diversity. Encourage residential developments serving a range of diverse households and incomes.
- **LUD 3.9**: Parcel assembly. Support the assembly of smaller parcels to encourage infill development that meets City standards and spurs neighborhood reinvestment.
- **LUD 6.2** Pursue equitable distribution of community amenities, public facilities and services within walking distance of residential neighborhoods.
- **LUD 6.3** Encourage building facades and frontages that create a presence at the street and along interior pedestrian paseos or pathways.
- **LUD 6.5** Support pedestrian and bicycling improvements and connections between neighborhoods.
- **LUD 8.3** Enhanced publicly-accessible bicycle and pedestrian connections. Encourage new and existing developments to enhance publicly-accessible bicycle, pedestrian and transit connections.
- **LUD 9.1** Height and setback transitions. Ensure that new development includes sensitive height and setback transitions to adjacent structures and surrounding neighborhoods.
- **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: Comprehensive Modal Plan

AccessMV is a modal plan 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, 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. The policy aims 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% 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 (KSI) in collisions by 15% every three years from a current three-year annual average baseline of 19 people.

In September 2024, The City advanced this policy with adoption of the Vision Zero Action Plan and Local Road Safety Plan (VZAP/LRSP). The plan builds on data-driven crash and systemic safety analyses and stakeholder engagement. Key strategies include prioritizing infrastructure improvements on corridors and intersections identified in the High Injury Network, implementing emphasis areas such as safe speeds, pedestrian crossings, and equity priority locations to

Mountain View VMT Thresholds

On June 30, 2020, the City Council of Mountain View passed a Resolution which established the City's implementation policy for SB 743. This resolution replaced LOS with Vehicle Miles Traveled (VMT) as the primary metric for CEQA transportation analyses. The policy defined project-screening criteria based on geographic location and project size, set numeric VMT thresholds at 15 percent below the existing Nine-County Bay Area regional averages for various land-use categories, and introduced a separate Multimodal Transportation Analysis (MTA) to evaluate site-level circulation, safety, and other local effects that fall outside CEQA requirements.

Under Mountain View's VMT policy, residential projects have a significant transportation impact if their home-based VMT per capita does not achieve a reduction of at least 15 percent below the current Bay Area regional average of 13.95 miles per capita. Thus, residential projects exceeding 11.9 VMT per capita would result in a significant impact. To evaluate this, the City generally relies on the Santa Clara Countywide VMT Evaluation Tool, developed by the VTA, which provides citywide and regional VMT estimates calibrated to the Bi-County travel model. As part of the City's 2020 VMT policy adoption, staff also published screening maps that identify Traffic Analysis Zones (TAZs) in Mountain View already performing at or below the 15-percent-below-average threshold. Small to medium size residential projects located in these low-VMT zones can generally be presumed to screen from further VMT impact analysis, provided their scale and use are consistent with the surrounding area.

For office, industrial, and other employment-based developments, the significance threshold is similarly established at 15 percent below the existing regional average home-based work VMT per

employee. Using the current Bay Area baseline of 15.33 miles per employee, the applicable threshold for these uses is 13.0 VMT per employee.

Projects located within traffic analysis zones (TAZs) already performing at or below the respective 15-percent-below-average thresholds are generally eligible for streamlined CEQA review, provided the proposed land use and scale align with existing neighborhood conditions.

Retail land uses follow distinct guidelines due to their typical effect of redistributing existing shopping trips rather than generating new trips. Local-serving retail projects of 50,000 square feet or less are presumed to have a less-than-significant VMT impact and are exempt from detailed VMT analysis. Retail developments larger than 50,000 square feet require evaluation of the net change in total VMT within the affected area and any increase would indicate a significant transportation impact under CEQA.

For mixed-use, unique, or atypical land-use projects, Mountain View requires analysts to choose a suitable VMT metric—typically either project-generated VMT per service population or the net change in total VMT. To avoid significant impacts, such projects must demonstrate either a 15-percent reduction below the applicable regional average or no net increase in total VMT. The CEQA documentation must clearly justify the selected VMT metric.

Finally, for transportation capacity–enhancing projects, such as roadway widening or interchange construction, VMT is assessed based on the net change in total VMT in the Project study area. Any net increase, after accounting for induced travel demand, constitutes a significant impact and must be addressed through feasible mitigation strategies.

Mountain View updates these thresholds periodically following each Santa Clara Valley Transportation Authority (VTA) Bi-County travel-model run. Project applicants should verify current baseline values and threshold applicability with City staff at the outset of any CEQA transportation analysis.

5. Significance Criteria

The detailed impact criteria for VMT and other transportation-related items are described below. The Project's potential impacts are presented in **Chapter 6.**

Significance Criteria

The significance thresholds described in the following sections address:

- Plan Conflicts (i.e., impacts to transit, roadways, bicycle, and pedestrian systems)
- VMT Impacts

Hazardous conditions and emergency access will not be evaluated for the Project as the released project description lacks sufficient information to perform a detailed safety and hazards assessment or an emergency vehicle access impact analysis beyond what is already included in the *City of Mountain View Draft 2030 General Plan and Greenhouse Gas Reduction Program Environmental Impact Report* (2011). The Plan Conflict and VMT impact criteria are discussed further below.

Plan Conflicts

To determine the proposed Project's consistency with relevant transportation programs, plans, ordinances or policies, the following significance thresholds were applied to each respective mode of travel—transit system, roadway system, bicycle system, and pedestrian system as listed below.

TRANSIT AND CARPOOL SYSTEM

Analysis of transit-related impacts encompasses two components: (1) transit capacity, and (2) a project's consistency with local transit plans. For transit capacity, a significant impact would occur if the Project creates demand for public transit above the capacity which is provided or planned.

To determine the Project's consistency with local transit plans, significant impacts would occur if the Project or any part of the Project:

- Disrupts existing transit services or facilities; or
- Conflicts with an existing or planned transit facility; or
- Conflicts with transit policies adopted by the City of Mountain View, Santa Clara County, or the Santa Clara Valley Transportation Authority for their respective facilities in the Project area.

ROADWAY SYSTEM

To determine the proposed Project's consistency with local roadway plans, significant impacts would occur if the Project or any part of the Project:

- Disrupts existing or planned roadway facilities or conflicts with applicable program, plan, ordinance or policy.
- Conflicts with an existing or planned roadway facility; or
- Conflicts with roadway network plans, guidelines, policies, or standards within the Project area.

BICYCLE SYSTEM

The proposed Project would create a significant impact related to the bicycle system if the Project or any part of the Project:

- Disrupts existing bicycle facilities;
- Interferes with planned bicycle facilities; or,
- Conflicts with applicable bicycle system plans, guidelines, policies, or standards.

PEDESTRIAN SYSTEM

The proposed Project would create a significant impact related to the pedestrian system if the Project or any part of the Project:

- Disrupts existing pedestrian facilities; or
- Interferes with planned pedestrian facilities; or
- Conflicts with applicable pedestrian system plans, guidelines, policies, or standards.

VMT Impacts

The VMT impact analysis for the Project considers the potential to influence vehicle miles traveled (VMT) through changes in residential density, location, and redevelopment patterns. Given the qualitative infill housing VMT assessment methods, which is further detailed in **Appendix B**, significance thresholds are not defined by numeric VMT rates but by contextual and policy-based criteria. **Table 4** summarizes the qualitative significance thresholds used to evaluate the Project's VMT impacts.

Table 4: VMT Significance Criteria Framework

Impact Category	Significance Threshold	Criteria for Impact Determination
Project Impact (Direct)	The threshold to be applied in assessing project-specific impacts is 15% below the existing VMT rate for the region.[1]	- The project converts affordable housing to market-rate units, reducing affordability and increasing VMT rates. - The project adds housing in areas not identified as low-VMT zones. - The project does not increase residential density.
Cumulative Impact	The threshold to be applied in assessing cumulative impacts (project's effect on VMT) is no change in the cumulative conditions (future) boundary VMT for the region.[1]	- The project exacerbates the City's job-housing imbalance and increasing VMT rates. - The project is inconsistent with the Regional Transportation Plan/Sustainable Community Strategy Plan policies (Plan Bay Area) and its supporting Transit-Oriented Communities (TOC) Policy.

Note: 1 – The region is the 9-Bay Area counties.
Source: Fehr & Peers, 2025.

Note on State VMT Exemptions and Streamlining Legislation

Since 2022, the California Legislature has adopted and advanced several bills that either exempt qualifying projects from CEQA or mandate ministerial approval, thereby broadening the circumstances under which Mountain View's VMT screening criteria apply. Key measures include:

AB 1449 (2022) – Affordable-Housing CEQA Exemption
AB 1449 provides a full CEQA exemption for 100 percent affordable housing located on infill sites that either (1) within low-VMT areas, (2) within one-half mile of high-quality transit, or (3) otherwise meet state-defined infill criteria. Under this statute, R3 projects that are entirely affordable can bypass both CEQA review and VMT analysis if located within mapped low-VMT traffic analysis zones (TAZs) or along the El Camino Real high-quality transit corridor.

SB 423 (2023) – SB 35 Extension and Expansion
SB 423 extends and expands the ministerial approval process established by SB 35 through 2036 for qualifying infill mixed-income projects in jurisdictions that are not meeting state-mandated housing production targets. The bill introduces additional labor protections and anti-displacement provisions. Most Mountain View R3 sites would be eligible for this streamlined "shot clock" approval, eliminating discretionary CEQA findings and reducing VMT evaluation to a checklist process.

AB 2011 / SB 6 (2022) – Commercial-Corridor Housing Streamlining
These companion bills override local zoning restrictions to permit residential development on office and retail parcels along commercial corridors. Projects that meet affordability and prevailing wage requirements are eligible for SB 35-like streamlining. For Mountain View, this unlocks underutilized commercial parcels along California Street and El Camino Real for mid-rise R3 housing without requiring full Environmental Impact Reports (EIRs), with VMT impacts generally presumed to be less than significant.

AB 130 (2025) – Housing Omnibus (Fast-Track Housing Package)
AB 130 establishes a statewide VMT mitigation fee program that applies to residential development projects, creating a consistent framework for addressing transportation impacts across jurisdictions. It also extends indefinitely the provisions of SB 330, requiring replacement of any "protected units," including rent-stabilized units occupied by lower-income households, with below-market-rate units in new projects. As a result, the City's own housing replacement ordinance becomes unnecessary, since state law no guarantees no net loss of affordable housing. For Mountain View's R3 projects, this legislation provides both a standardized approach to VMT mitigation and stronger tenant protection measures while streamlining overall housing approvals.

SB 131 (2025) – Public Resources Code Alignment
SB 131 updates the Public Resources Code to align CEQA procedures with recent housing legislation. It formalizes that no VMT analysis is required for projects exempted under AB 1449 and clarifies the limited administrative record requirements for Class 32 infill exemptions. This provides legal certainty that qualifying R3 infill projects in Mountain View need only cite the applicable statutory exemption, without preparing a standalone VMT memorandum.

Future Legislation (Pending)

Several additional bills have been introduced in 2025 but have not yet been adopted. These proposals, if enacted, could further reduce CEQA and VMT review burdens for qualifying infill projects:

AB 609 (2025) – Infill-Housing CEQA Exemption
AB 609 establishes a broad CEQA exemption like the existing Class 32 categorical exemption for infill housing. It applies to multifamily projects on sites up to 20 acres that are previously developed or predominantly surrounded by urban uses, provided projects meet zoning, avoid hazardous sites, and satisfy affordability and labor requirements. Most Mountain View R3 parcels would qualify, allowing the City to rely on a simple notice of exemption rather than preparing a full transportation analysis.

SB 607 (2025) – Infill-Project Litigation Reform
SB 607 limits the scope of CEQA litigation for qualifying infill projects to only specific, disqualifying issues identified in the administrative record and imposes a 270-day timeline for judicial review. This substantially reduces post-approval litigation risk and shortens the project schedule for R3 zoning-consistent developments.

SB 79 (2025) – Transit-Proximate Up-Zoning
SB 79 mandates by-right approval and a CEQA exemption for five- to eight-story multifamily housing located within one-half mile of rail stations or high-frequency bus corridors. It also allows transit agencies to apply objective design standards on surplus land. In Mountain View, this measure would expedite mid-rise R3 projects near the San Antonio Caltrain Station and along the El Camino Real bus rapid transit corridor, largely eliminating the need for CEQA and VMT analysis.

These pending measures are not yet in effect but are included here for context, as they signal the Legislature's direction toward additional streamlining of infill housing approvals.

Collectively, these legislative changes substantially reduce the CEQA and VMT review burdens for qualifying R3 projects in Mountain View, especially those that are affordable, transit-oriented, or located along commercial corridors. The Project advances these objectives by permitting higher-density multifamily development in infill locations near transit. In this way, the Project exemplifies the types of housing outcomes prioritized in recent legislation and aligns local implementation with the state's broader strategy to streamline approvals and increase the housing supply.

6. Environmental Impacts and Mitigation Assessment

This section explains the analysis methods, assumptions, and results used to identify potential significant impacts of the proposed Project on the transportation system, consistent with the significance criteria detailed in **Chapter 5**. Transportation and traffic impacts are assessed, and mitigation measures are recommended for any impacts identified as significant.

Plan Conflict Analysis

This section evaluates whether the proposed Project conflicts with adopted transportation and land use plans. Relevant plans include the City's General Plan (circulation and land use policies), Bicycle/Pedestrian Plans, Transit-Oriented Development policies, and regional plans (e.g., the County Congestion Management Program, VTA's plans, MTC's Plan Bay Area). A conflict would occur if the Project would undermine the goals or policies of these plans. If any conflicts are identified, the analysis recommends how the Project can be modified or what mitigating measures would be needed to resolve the inconsistency (such as incorporating additional multimodal facilities or revising plan policies).

Transit Evaluation

Consistency with Existing and Planned Facilities

The Project is a legislative action that increases allowable residential densities in areas often served by VTA bus and light-rail routes and by Caltrain commuter rail. It does not modify transit rights-of-way, relocate stops, or alter supporting infrastructure. It also does not interfere with projects identified in *Plan Bay Area 2050*, *VTA's Short-Range Transit Plan*, or the Mobility Element of the *Mountain View 2030 General Plan*. Any future development permitted under the new zoning will be required to meet applicable VTA, City, and State design standards for transit facilities.

Demand and Operating Conditions

Higher residential capacity near established transit corridors will increase transit demand. VTA can respond through *VTA's Title VI: System-Wide Service Standards and Policies, OPS-PL-0059*; which uses the agency's adopted performance measures of vehicle load, headway, on-time performance, service availability, and ridership productivity, to adjust service levels equitably.

Local Policy Framework

Mountain View's General Plan includes goals to enhance access to transit and increase connections between land uses and the transportation system:

- Goal MOB 5.1: Coordinate with local and regional transit agencies including Metropolitan Transportation Commission, VTA, JPB (Caltrain), SamTrans and the California High-Speed Rail Authority to improve transportation service, infrastructure and access in the city.
- Goal MOB 5.2: Actively participate with the California High- Speed Rail Authority in planning any future high-speed rail service to address urban design, traffic, noise and compatibility issues.

- Goal MOB 5.3: Create or partner with transit providers, employers, educational institutions, major commercial entities and event organizers to improve local transportation services.
- Goal MOB 5.4: Identify and implement new or enhanced transit services to connect Downtown, El Camino Real, San Antonio, North Bayshore, East Whisman and NASA Ames Research Park.
- Goal MOB 5.5: Support right-of-way design and amenities consistent with local transit goals to make it easier to get to transit services and improve transit as a viable alternative to driving.
- Goal MOB 5.6: Explore emerging transit technologies such as Personal Rapid Transit and their citywide applicability.

The project could align with these goals if increased residential density spurs a Title VI service level adjustment, resulting in new or enhanced transit services in the City of Mountain View.

Impact Conclusion

The Project does not remove transit right-of-way, delay capital projects, or conflict with any adopted transit programs, plans, ordinances, or policies. Therefore, the impact on existing or planned transit facilities is considered ***less-than-significant***.

Roadway Evaluation

Consistency with Existing and Planned Facilities

The Project is a legislative action that modifies allowable residential densities across Mountain View but does not propose physical changes to the roadway network. It does not remove roadway rights-of-way, relocate travel lanes, or interfere with the implementation of projects identified in Plan Bay Area 2050, the Mountain View 2030 General Plan Mobility Element, or the Santa Clara County Congestion Management Program Monitoring and Conformance Report. Future development projects permitted under the updated zoning will remain subject to applicable roadway design standards established by the City, Caltrans, and VTA, including the requirement for project-specific level of service analysis.

Demand and Operating Conditions

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 opportunities. Furthermore, the City's transition to VMT-based CEQA analysis emphasizes the reduction of automobile dependency and supports roadway operations that prioritize safety and accessibility for all users.

Local Policy Framework

Mountain View's Mobility Element includes goals to improve the transportation system while reducing automobile dependence:

- Goal MOB 1.1: Multi-modal planning. Adopt and maintain master plans and street design standards to optimize mobility for all transportation modes.
- Goal MOB 1.2: Accommodating all modes. Plan, design and construct new transportation improvement projects to safely accommodate the needs of pedestrians, bicyclists, transit riders, motorists and persons of all abilities.

- Goal MOB 1.3: Pedestrian and bicycle placemaking. Promote pedestrian and bicycle improvements that improve connectivity between neighborhoods, provide opportunities for distinctive neighborhood features and foster a greater sense of community.
- Goal MOB 1.4: Street design. Ensure street design standards allow a variety of public and private roadway widths.
- Goal MOB 1.5: Public accessibility. Ensure all new streets are publicly accessible.
- Goal MOB 1.6: Traffic calming. Provide traffic calming, especially in neighborhoods and around schools, parks and gathering places.

The Project does not conflict with or undermine these policies, since it supports infill residential growth that may reduce per capita vehicle use.

Impact Conclusion

The Project is a policy action that changes zoning allowances but does not include specific roadway modifications or capital improvements. At this stage, no conflicts have been identified with adopted roadway plans or policies. Because the Project does not directly alter the physical transportation network, its potential impact potential impact to existing or planned roadway facilities is considered ***less-than-significant***.

Bicycle Evaluation

Consistency with Existing and Planned Facilities
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. It will not interfere with the implementation of projects outlined in the Mountain View Bicycle Transportation Plan, VTA's Countywide Bicycle Plan, or the regional bikeway improvements identified in Plan Bay Area 2050. Future developments allowed under the Project will be required to comply with city, state, and VTA design standards for bicycle facilities.

Demand and Operating Conditions
The introduction of additional housing near established bikeways may increase bicycle trips for commuting, recreation, and daily needs. Mountain View's existing and planned bicycle infrastructure, combined with supporting policies, can accommodate this demand while improving active transportation safety and connectivity.

Local Policy Framework
Mountain View's Mobility Element includes policies that actively support bicycle travel:

- Goal MOB 4.1: Bicycle network. Improve facilities and eliminate gaps along the bicycle network to connect destinations across the city.
- Goal MOB 4.2: Planning for bicycles. Use planning processes to identify or carry out improved bicycle connections and bicycle parking.
- Goal MOB 4.3: Public bicycle parking. Increase the amount of well-maintained, publicly accessible bicycle parking and storage throughout the city.
- Goal MOB 4.4: Bicycle parking standards. Maintain bicycle parking standards and guidelines for bicycle parking and storage in convenient places in private development to enhance the bicycle network.
- Goal MOB 4.5: Promoting safety. Educate bicyclists and motorists on bicycle safety.

Impact Conclusion
The Project does not remove or modify existing bicycle facilities, delay planned improvements, or conflict with local or regional bicycle plans. Increased bicycle demand will be supported by existing City policies and infrastructure plans, including the City's Transportation Impact Fee (TIF) program, which dedicates funding to bicycle and pedestrian improvements identified in adopted plans. Therefore, the impact on existing or planned bicycle facilities is considered **less-than-significant**.

Pedestrian Evaluation

Consistency with Existing and Planned Facilities
The Project does not include modifications to pedestrian facilities within rights-of-way. However, it will create various conditions where walking is improved in the City, including new connections through large blocks and pedestrian-friendly development design. It will 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. Future developments under the new zoning will be required to comply with applicable design standards that promote pedestrian accessibility and safety.

Demand and Operating Conditions
Higher residential densities will naturally increase walking trips, especially for local errands, access to transit, and recreational use. All new development will be connected to the pedestrian network. Mountain View's existing pedestrian infrastructure and planned streetscape improvements are designed to support this anticipated growth in walking trips and promote safe, comfortable access throughout the city. In addition, City Policies call for identifying and constructing new pedestrian crossings and implementing other enhancements to further strengthen network connectivity and safety, including Policy **MOB 4.2** and Policy **MOB 4.3** in the 2030 General Plan.

Local Policy Framework
The City's Mobility Element supports a safe, accessible, and connected pedestrian environment:

- Goal MOB 3.1: Pedestrian network. Provide a safe and comfortable pedestrian network.
- Goal 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 3.3: Pedestrian and bicycle crossings. Enhance pedestrian and bicycle crossings at key locations across physical barriers.
- Goal MOB 3.4: Avoiding street widening. Preserve and enhance citywide pedestrian connectivity by limiting street widening as a means of improving traffic flow.
- Goal MOB 3.5: Walking and bicycling outreach. Actively engage the community in promoting walking and bicycling through education, encouragement and outreach on improvement projects and programs.

Impact Conclusion
The Project does not remove pedestrian facilities, delay planned improvements, or conflict with adopted pedestrian plans or policies. Increased walking activity can be accommodated through existing and planned infrastructure and policies. Therefore, the impact on existing or planned pedestrian facilities is ***less-than-significant***.

VMT Analysis

This section presents an analysis of the project's potential impact on VMT, focusing on both Project-generated and Cumulative effects. The analysis follows the qualitative infill housing VMT assessment 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 infill housing VMT assessment 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. This approach allows for a more context-sensitive assessment of how the Project may influence travel behavior and transportation outcomes.

Potential significant impacts considered in this analysis include:

- Conversion of affordable units to market rate housing (which could increase VMT)
- Adding housing in high-VMT (presumed impact) areas,
- Failure to increase residential density in targeted locations,
- Worsening the jobs-housing imbalance, and
- Inconsistency with the Plan Bay Area 2050 and its Transit-Oriented Communities (TOC) policy.

Each of these criteria is addressed qualitatively, with attention to both direct impacts (from new development enabled by the zoning update) and cumulative impacts (from broader regional growth and travel patterns).

Project-Generated VMT Analysis (Project Analysis)

This section evaluates whether the proposed Project would result in a significant transportation impact under CEQA, based on project-generated VMT. The City of Mountain View's VMT significance threshold requires that new development generate VMT at eighty-five percent of the existing VMT rate for the region. The analysis considers three potential VMT impact scenarios, then summarizes why, on balance, the Project is expected to meet the City's threshold given State policy direction, local data, and City implementation tools. It focuses on three key scenarios that could potentially increase VMT:

- **Conversion of Affordable Housing to Market-Rate Housing**. Replacing lower-cost units with market-rate units, potentially displacing lower-income residents and increasing their travel distances.
- **Housing in High-VMT Locations**. Adding new housing in area not currently designated low-VMT could result in higher driving rates for those new residents.
- **Lack of Density Increase**. Redevelopment that fails to significantly increase housing density may miss opportunities to reduce VMT per household.

Policy and Data Context

Alignment with State policy. The Project advances State goals to reduce driving by adding homes in jobs-rich, infill locations and enabling small neighborhood-serving commercial uses that shorten trips. These land use changes align with OPR's VMT framework and the California Air Pollution

Control Officers Association (CAPCOA) strategy T-1[13], which documents a negative elasticity between residential density and VMT and caps the applicable reduction at 30 percent from baseline.

Each scenario is examined below, with evidence and policy context. The analysis centers on direct project outcomes and whether the project's VMT per capita would remain below the City's threshold.

Affordable Housing Conversion and VMT

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. Lower-income residents in general tend to drive less, often relying on carpools, transit, or shorter commutes out of necessity[14]. If a project were to demolish, for example, 20 older rent-stabilized apartments and replace them with 20 luxury condominiums, the original tenants might be priced out and move farther from jobs, leading to longer commutes (increased regional VMT). The State's Office of Planning and Research (OPR) has flagged this issue: projects that replace affordable units with fewer or higher-income units can negate the VMT benefits of infill development. In other words, removing affordable housing tends to increase the vehicle travel of those former residents. [15]

The City of Mountain View and the State of California have anti-displacement protections in place today. The Housing Crisis Act of 2019 (Senate Bill 330) prohibits cities from approving any housing development that would demolish "protected units" (which includes affordable and rent-stabilized units occupied by lower-income households) unless the project replaces those units one-for-one with new units at comparable affordability. In Mountain View, this means a developer must rebuild at least the same number of "protected" units and offer those to the displaced tenants at the same rents as before.[16] Together with the City's Tenant Relocation Assistance Ordinance (TRAO)[17], these measures have effectively halted redevelopment projects that would otherwise displace low-income renters without replacement housing.

Since SB 330 took effect in 2020, the number of projects displacing tenants in rent-controlled units has dropped to near zero, according to city data.[18] This indicates that the project will not actually result in a net loss of affordable units, any redevelopment under the Project must replace affordable units and avoid the displacement-driven VMT increase scenario.

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[13] California Air Pollution Control Officers Association. (2017). *CalEEMod: California Emissions Estimator Model user's guide (Version 2016.3.2).* California Air Pollution Control Officers Association. https://www.caleemod.com/documents/handbook/full_handbook.pdf

[14] Howell, A., Currans, K. M., Gehrke, S., Norton, G., & Clifton, K. J. (2018). Transportation impacts of affordable housing: Informing development review with travel behavior analysis. *Journal of Transport and Land Use, 11*(1), 103–118. https://doi.org/10.5198/jtlu.2018.1129

[15] Governor's Office of Planning and Research. (2018, December). ON EVALUATING TRANSPORTATION IMPACTS IN CEQA: Technical Advisory. California Natural Resources Agency.

[16] Noack, M. (2020, January 10). *A little-noticed new law could upend a key argument against rent control*. *Mountain View Voice*. Retrieved August 12, 2025, from https://www.mv-voice.com/news/2020/01/10/a-little-noticed-new-law-could-upend-argument-against-rent-control/

[17] The Tenant Relocation Assistance Ordinance (TRAO) is a City of Mountain View policy requiring landlords to provide relocation benefits to eligible tenants displaced by certain types of development, renovation, or demolition.

[18] Martin, M. (2022, October 19). Tenant displacements in Mountain View drop significantly, thanks to new state law. Mountain View Voice.

SB 330's provisions were set to expire in 2030, but they were extended indefinitely through AB 130. With these safeguards in place, the project is unlikely to cause substantial displacement of low-income residents. The direct project impact of Affordable Housing Displacement on VMT would be ***less-than-significant***, given the appropriate safeguards are in place.

Location and Travel Characteristics of New Development

Because the Project applies citywide across many neighborhoods, the distribution of new housing is a key determinant of direct impacts. If redevelopment under R3 is concentrated in transit-rich, low-VMT areas then each added household will likely generate fewer vehicle miles on average than a household in a low-density peripheral area. Residents in well-located R3 projects may be able to walk or bike to nearby employers (e.g. Google in North Bayshore, or offices in East Whisman) and other household travel needs, or use transit for regional trips, thereby keeping VMT low.

Recent analysis by UC Berkeley's Terner Center finds that infill housing enables residents to drive less by design, and that which neighborhoods qualify as "low-VMT" depends on the model and baseline used[19]. In short, some parts of Mountain View are low-VMT, and others are not, so outcomes vary by site context. We addressed this unknown site mix by qualitatively assessing four potential location types detailed below.

Applying a four-location framework:

- **Low-VMT area, near transit**: Sites that are already low-VMT and within a half mile of high-quality transit are expected to produce VMT rates at or below applicable thresholds, supporting a ***less-than-significant*** determination. Terner's comparisons show that many transit-served, job-rich urban neighborhoods exhibit residential VMT well below averages. For example, block groups next to downtown Mountain View average about 17 VMT per person per day, which is more than 15 percent below the state average of 21 in Replica's 2023 model.
- **Low-VMT area, away from transit**: Terner's maps indicate that low-VMT designations are not limited to rail or frequent bus walksheds. In Mountain View, the State's low-VMT layer identifies many neighborhoods as low-VMT that are not within a half mile of high-quality transit. This suggests that compact land use, street connectivity, and access to nearby jobs and services can keep VMT rates low even when transit is farther away. R3's multifamily formats and smaller units align with these characteristics, so added residential density in these areas is expected to meet VMT thresholds.
- **High-VMT area, near transit:** Where current conditions index as high-VMT, but the site is near transit. As noted in **Table 4**, high-VMT refers to parcels where VMT per capita exceeds the City's adopted significance threshold of 15% below the existing VMT rate for the region. Increasing residential density can reduce per-household VMT relative to lower-density patterns by shortening trips, raising non-auto mode shares, and moderating vehicle ownership. The Terner report shows that when the baseline shifts from a Bay Area regional comparison to a statewide comparison, many Bay Area neighborhoods, including some in Mountain View, are recategorized as "low VMT". This shift reflects that transit-rich infill areas in Mountain View perform better than the statewide average, which reinforces the conclusion that adding higher-density housing near transit in the Project area is likely to yield VMT rates consistent with a ***less-than-significant*** conclusion.

[19] Strangeway, R., & Subin, Z. (2025, April). *Aligning housing with climate goals: The importance of measuring VMT.* Terner Center for Housing Innovation, University of California, Berkeley

- **High-VMT area, away from transit**: In areas above the City's VMT threshold and lacking nearby transit, baseline VMT is usually higher. Without a change in the built environment, residential projects built in high-VMT areas have the potential of generating a VMT at an equally high VMT rate. While multiple data sources consistently show that many parts of Mountain View already perform as low-VMT, some areas on the urban periphery or farther from jobs, services, and frequent transit remain higher-VMT contexts where travel demand is more car-dependent. Even so, the Terner synthesis and cited literature indicate that adding multifamily infill and applying site design measures reduces VMT compared with maintaining lower-density, auto-oriented use. Given the Project's emphasis on multifamily housing, mixed land uses, and site design that supports walking and biking can partially mitigate VMT in these contexts. However, there is a risk that if a substantial portion of new development occurs in this fourth category, those residents' driving could be closer to the regional average (or even above the City's threshold). Therefore, the impact of residential infill is **potentially significant**.

The R3 Zoning District Update will apply to sites across Mountain View, some located in low-VMT areas and others in areas with a presumed impact. In low-VMT zones, adding equal or higher-density residential, as these areas already support lower travel demand through proximity to jobs, services, and transit. In areas with higher VMT, the introduction of denser housing, smaller units, and transit-supportive design can reduce VMT relative to existing conditions. These strategies are likely to support lower VMT rates—particularly where transit access and walkable infrastructure are present.

These benefits are supported by substantial research and by Mountain View's own VMT screening maps, which identify neighborhoods where development tends to produce VMT per capita below regional thresholds. It is reasonable to assume that many R3 units will be built in such areas, and infill development in these contexts can help lower regional VMT per capita by introducing residents who drive less than the regional average.

However, it's important to note that the City's VMT screening maps were developed several years ago and may not fully capture evolving travel patterns, such as increased remote work or changing transit use. Moreover, the Project does not prescribe exactly where or when redevelopment will occur, and not all R3-zoned parcels offer the same transportation options. While nearly all neighborhoods in Santa Clara County, including Mountain View, remain car dependent, the critical difference is in the frequency and length of auto trips. Within Mountain View, variation is more modest than in other parts of the county, but parcels further from Caltrain, light rail, or major employment centers tend to producer higher VMT than those near these destinations. If a substantial share of the projected 10,000–16,000 new units is built in these areas, the resulting travel demand could approach or exceed the regional average, diminishing the per-capita VMT benefit.

Project design and resident demographics will also influence outcomes. R3 zoning allows a range of housing types, and multi-family or smaller-unit developments typically generate less VMT per household than large single-family homes. The assumption is that R3 will encourage denser, multi-family infill, which tends to result in lower vehicle ownership and trip rates.[20]

Given the lack of parcel-specific development proposals, this analysis acknowledges a range of possible outcomes. In a best-case scenario, the Project facilitates transit-oriented apartments and condominiums occupied by local employees, keeping cumulative VMT per capita stable or declining.

[20] Boarnet, M. G., & Comandon, A. (2025, April). *Residential Density: Policy Brief*. University of Southern California. California Air Resources Board.

In a less favorable scenario—where development skews toward auto-oriented sites or attracts long-distance commuters—regional VMT metrics could rise.

A central factor in determining VMT outcomes is residential density. Increasing the number of housing units per acre—especially in existing medium-density neighborhoods—is one of the most effective strategies for reducing VMT. The Project's emphasis on upzoning and infill development is aligned with this goal.

VMT Mitigation: Infill Housing Density Increase and VMT Reduction

A major objective of the Project is to allow higher residential densities (more units per acre) in existing medium-density neighborhoods. A wide body of research suggests that, all else being equal, denser developments generate fewer vehicle trips per unit than less dense developments. One of the more effective strategies to reduce the VMT generated by residential developments is increasing the residential density (Strategy T-1 in the California Air Pollution Control Officers Association (CAPCOA) 2021 Handbook[21]). Increasing residential density results in shorter and fewer trips by single-occupancy vehicles and thus results in per-capita VMT reductions. 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%.[22] The CAPCOA Handbook also sets a maximum VMT reduction of 30% from baseline conditions for this strategy.[23] As shown in **Table 5**, multi-family infill developments that are denser than the existing neighborhood would be expected to generate less VMT than that of the surrounding neighborhood. This project will be denser than the surrounding residential development and is anticipated to have up to a 30 percent reduction in the baseline residential VMT rate.

Table 5: VMT Reductions Associated with Density

Density (Dwelling units per acre)[1]	VMT Reduction Compared to Average U.S. Density
9.1[2]	0%
10	-2.2%
15	-14.3%
20	-26.4%
25	-30%

Notes: 1 - While the existing table shows density up to 25 du/acre (with ~30% VMT reduction), there is evidence that further increases, up to 50 or even 100 du/acre, yield additional VMT savings, though marginal benefits taper. For example, case studies show that going from ~50 to ~100 du/acre reduces VMT per household further, but less dramatically than earlier increases. Thus, if portions of the Project reach those densities, modest additional VMT reduction beyond ~30% could be expected.
2 - Average residential density in the U.S. should serve as the default for calculations unless the surrounding neighborhood's density is higher than 9.1 dwelling units per acre. These reduction values should only be applied when project density exceeds that of the surrounding neighborhood.
Source: CAPCOA 2021 Handbook, Planetizen. 2022, Fehr & Peers. 2023

[21] California Air Pollution Control Officers Association (CAPCOA) 2021 *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*

[22] As noted in the CAPCOA Handbook, this elasticity is appropriate for residential uses that are greater than the average residential density in the U.S. of 9.1 du/acre.

[23] CAPCOA Handbook for Analyzing Greenhouse Gas Emission Reduction, Assessing Climate Vulnerabilities, and Advancing Health and Equity Strategy T-1. Increase Residential Density

Application to the Project: The Project will generally allow higher density than current built conditions in R3 neighborhoods, many of which today consist of older low-rise apartments or single-family homes on large lots. Redevelopment under proposed new densities would permit multi-family buildings at greater dwelling unit counts per acre. Such an increase in residential density directly translates to lower VMT per unit compared to the status quo, if the project exceeds the surrounding neighborhood's density.[24] Higher residential density is associated with lower VMT per capita because it shortens trip lengths, increases the viability of walking, biking, and transit, and supports a greater mix of land uses in close proximity. In a CEQA context, this means that failing to increase residential density would miss out on a major VMT reduction opportunity. The project, however, is explicitly intended to increase housing density across R3 zones, which is a VMT-reducing strategy.

Given these indicators, allowing more units per lot is expected to reduce project-generated VMT rates by increasing residential density. If residential density does not increase on a site, no VMT reduction would be anticipated. In most cases, the rezoning is expected to yield higher units per acre, which typically lowers VMT per household compared with lower density patterns. Any residual uncertainty relates only to the degree of residential density ultimately achieved on individual sites, and the City's and State's ongoing displacement-prevention actions. Therefore, the project is not expected to generate VMT above the City's significance threshold and thus the impact is ***less-than-significant***.

Project Generated VMT Impact Conclusion

Based on the significance criteria outlined in Chapter 5, the Project could result in a direct VMT impact under CEQA if any of the following conditions occur:

- The project converts affordable housing to market-rate units, reducing affordability and increasing VMT rates.
- The project adds housing in areas not identified as low-VMT zones.
- The project does not increase residential density.

However, the Project includes provisions—and is supported by existing City policies—such as anti-displacement measures, transit-oriented zoning, and density incentives, all of which are designed to reduce these risks.

Future infill housing development under the R3 zoning that is located in a low-VMT area and/or demonstrates a substantial increase in residential density (refer to Appendix C, Strategy T-1 in the California Air Pollution Control Officers Association (CAPCOA) 2021 Handbook[25]) would be consistent with these findings, and no further VMT mitigation would be needed. Given these safeguards, the Project is not expected to increase per-capita VMT above the project-specific impact threshold, and therefore, the project-generated VMT impact is considered ***less-than-significant*** under CEQA.

[24] Metropolitan Transportation Commission, & Association of Bay Area Governments. (2024, April). *SB 743 policy adoption technical assistance program: Establishing an infill and affordable housing screen* [White paper]. https://abag.ca.gov/sites/default/files/documents/2024-04/MTC_Infill_Housing_VMT_White_Paper.pdf

[25] California Air Pollution Control Officers Association (CAPCOA) 2021 *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*

Cumulative VMT Impact Analysis (Cumulative and Indirect Analysis)

This section evaluates the cumulative transportation impacts of the proposed R3 Zoning District Update, focusing on how the Project may influence regional VMT per capita under future buildout conditions. The analysis considers whether the Project's addition of new housing and changes to the residential mix would contribute to a net increase in regional VMT per capita. Key metrics include:

- **The jobs-to-housing ratio**, which reflects the city's balance between employment and residential capacity.
- **Jobs-housing linkage fees** and related policies, such as those in the East Whisman Precise Plan, which aim to align commercial growth with housing production.

Specifically, the analysis examines whether the Project:

- **Exacerbates Mountain View's jobs–housing imbalance**, potentially increasing commute distances and VMT rates.
- **Conflicts with regional transportation and land use policies**, including the Metropolitan Transportation Commission's Plan Bay Area 2050 and its Transit-Oriented Communities (TOC) Policy, both of which promote compact, transit-supportive development to reduce VMT.

This cumulative impact assessment builds on the City's existing General Plan findings and evaluates the Project's contribution to regional travel patterns in the context of broader growth trends and policy goals.

Jobs-Housing Balance and Regional Travel

The Project would increase the city's housing capacity substantially, which in the long run tends to reduce regional VMT growth on the roadway system. By 2040 and beyond, additional housing in Mountain View, a city with large employment centers (e.g. North Bayshore, East Whisman), can allow more employees to live near their jobs, thereby shortening commute distances or shifting commutes from car to walking/biking. Mountain View today has a pronounced imbalance, with roughly 2.5 jobs per housing unit in the city, by comparison, a "balanced" community might have around 1.0 to 1.5 jobs per housing unit[26]. This imbalance forces tens of thousands of workers to commute from outside the city daily.

[26] SV@Home. (n.d.). Jobs and Housing. Silicon Valley at Home. Retrieved 07/26/2025 from https://siliconvalleyathome.org/resources/jobs-and-housing/

Table 6 illustrates a comparison of Mountain View's Jobs-Housing Balance to other nearby cities and regions. With the project, the city's jobs-housing ratio would move closer toward parity, which is expected to reduce net in-commuting and lessen growth in VMT on the roadways in the region. While regional growth overall may still increase VMT on regional roadways, the Project moderates this effect by enabling significantly more housing in proximity to existing jobs, addressing a root cause of high regional travel demand and VMT on the roadways in the region. This strategy is strongly supported by regional plans: Plan Bay Area 2050 calls for improving the jobs-housing mismatch in employment-rich areas to reduce long-distance commutes and transportation emissions.[27]

[27] Metropolitan Transportation Commission & Association of Bay Area Governments. (2022, January 28). Plan Bay Area 2050 Final Santa Clara County Factsheet. Plan Bay Area.

Table 6: Jobs-Housing Balance Comparison

Region	Jobs–Housing Balance Ratio (Jobs per Housing Unit)
Mountain View	2.23[1]
Palo Alto	3.54[1]
Santa Clara (City)	2.58[1]
Santa Clara County (future 2050 average)	~1.5 (2050 forecast)[2]
Bay Area region average	~1.3 (2050 forecast)[2]

Notes: 1 – Silicon Valley @ Home Silicon Valley at Home. (n.d.). *Mountain View: Jobs and housing balance*. Retrieved August 11, 2025, from https://siliconvalleyathome.org/resources/mountain-view/ 2 – Plan Bay Area 2050 Metropolitan Transportation Commission & Association of Bay Area Governments. (2022, January). *Plan Bay Area 2050: Santa Clara County fact sheet*. Retrieved August 08, 2025, from https://planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_Final_Santa_Clara_County_Factsheet_012822_0.pdf
Source: Fehr & Peers, 2025.

In addition to using the jobs-to-housing ratio as a qualitative lens for cumulative effects, Mountain View has advanced complementary policies to accelerate housing delivery and better align jobs and homes. The city charges a commercial jobs-housing linkage fee on new nonresidential development to fund affordable housing production.[28] The East Whisman Precise Plan includes a dedicated jobs-housing linkage strategy that ties new office entitlements to phased housing production through administrative guidelines.[29] Citywide inclusionary requirements under the Below-Market-Rate (BMR) program, along with Housing Element programs that rezone key corridors and streamline approvals, are intended to increase housing capacity and expedite project delivery. Together, these measures address the fact that housing in Mountain View has not been built fast enough to keep pace with job growth[30], and they provide funding, phasing, and entitlement tools that complement the Project.

However, it is important to note that the magnitude of VMT growth from improved jobs-housing balance is uncertain and depends on who occupies the new housing. If a significant portion of the R3 units are occupied by people who would otherwise live much farther away (commuting into Mountain View or nearby job centers) without much exurban backfilling, then regional commute VMT will decrease appreciably. On the other hand, some new residents may still work outside the city or take new jobs created by ongoing economic growth, in which case those housing units represent an increase in vehicle trips and VMT growth on the regional roadways.

In a regional travel model context, additional Mountain View housing could attract some growth that might otherwise occur in other cities, potentially reducing long-distance commutes, but it also adds to the total population and trip-making in the Bay Area. The Plan Bay Area 2050 forecast anticipates long-term growth in Mountain View, though its city-level population assumptions are generalized and subject to change. By comparison, the Project description estimates population could grow from

[28] City of Mountain View. (2019). *Ordinance No. 12.19: Amending Article XIV of Chapter 36 of the Mountain View City Code, regarding the Below-Market-Rate Housing Program* [PDF]. https://mcclibraryfunctions.azurewebsites.us/api/ordinanceDownload/16508/985638/pdf

[29] City of Mountain View. (2019, November 5). *Resolution No. 18398: Approving Draft Administrative Guidelines for the East Whisman Precise Plan Jobs-Housing Linkage Program (Exhibit A)*. https://laserfiche.mountainview.gov/WebLink/DocView.aspx?dbid=0&id=230944&repo=CityDocuments

[30] City of Mountain View. (2014). *2015–2023 Housing Element (Draft)* [PDF]. https://www.hcd.ca.gov/housing-elements/docs/mountain_view_5th_draft052314.pdf

approximately 86,500 residents in 2025 to about 148,200 by 2050 without the project and up to roughly 177,800 with full project buildout. While this upper-end scenario could exceed the regional forecast, the difference remains relatively modest and uncertain, so no definitive conclusion can be drawn. More meaningful is the distribution of growth: Plan Bay Area concentrated more housing in East Whisman, Downtown, and Shoreline West, whereas the Project would allow more distributed increases in density across districts. This distinction highlights that while both approaches accommodate additional population in Mountain View, they do so in different geographic patterns that may influence VMT outcomes. While infill development is far preferable to sprawl in terms of VMT per capita, the total VMT generated regionally could still increase if population and economic growth outpaced VMT-reducing measures.

In summary, the project's effect on the cumulative jobs-housing dynamic is largely beneficial (addressing a root cause of high regional VMT), but it does not eliminate the impact of growth – especially if job expansion continues. The Project helps but does not reverse the trend of rising travel demand associated with robust regional growth. Thus, from a cumulative perspective, the Project's contribution to VMT must be carefully managed with complementary policies to realize its VMT reduction potential.

Plan Consistency and Regional Strategies

Under CEQA, a project's inconsistency with regional plans aimed at reducing environmental impacts can itself signal a significant cumulative impact. In this case, the relevant plans are Plan Bay Area 2050 (which integrates land use and transportation to curb VMT and emissions) and MTC's TOC Policy (which conditions funding on supportive land use actions, especially around transit).

The Project is broadly consistent with the spirit of these plans (As shown in **Appendix D**) – it encourages growth within an existing urban area and near transit, which is essential to the Sustainable Communities Strategy. There is no proposal to expand roadways or any element that would conflict with regional transportation investment strategies. In fact, Plan Bay Area identifies Mountain View's employment centers as places to add housing to reduce long regional commutes. The Project directly facilitates that outcome by upzoning residential capacity citywide (including areas very near to job hubs like North Bayshore and East Whisman). Thus, in concept, the project supports Plan Bay Area's VMT-reduction goals.

The key potential inconsistency is one of distribution, timing and magnitude: because the R3 housing was not accounted for in Plan Bay Area's adopted growth allocation for Mountain View, the city may end up accommodating growth in different neighborhoods than the regional model anticipated (such as more housing in areas within a few blocks El Camino Real, rather than the regional model's focus on Downtown). This may not be a negative in terms of VMT per capita – more infill housing near major job centers is generally positive – but it means the regional travel forecasts might underestimate future travel demand in some areas. The City will coordinate with regional agencies as needed in future Plan Bay Area updates so that transportation infrastructure and policy support can be aligned with the higher housing growth.

Regarding the TOC Policy[31], the R3 Zoning Update is not directly subject to its requirements because the policy does not apply to sites with existing residential uses. Compliance with the policy is only necessary if the City seeks to pursue specific regional funding opportunities, and Mountain View may

[31] Metropolitan Transportation Commission. (2025, March 19). Transit-Oriented Communities (TOC) Policy. MTC.

choose whether or not to participate. Accordingly, while the project aligns with the broader goals of concentrating housing near transit, it is not governed by or contingent upon the MTC TOC policy. The general distribution of R3 zones include transit-adjacent neighborhoods (e.g. near the El Camino Real rapid bus corridor, VTA light rail stops, and reliable VTA bus service), and any significant upzoning near these stations will be coupled with TOC-consistent policies such as affordable housing production and preservation near transit. Therefore, there is no inherent conflict with Plan Bay Area or the TOC Policy. On the contrary, the project can be seen as furthering the region's long-term strategy of focused growth to reduce VMT.

Additional Considerations

In evaluating cumulative VMT trends, it is useful to consider broader travel patterns and real-world trends beyond the Project itself. Over the past 10–15 years, per-capita VMT in California and the Bay Area has remained relatively flat, a shift from the rapid VMT growth of previous decades. While total driving miles increased during the strong economic expansion of the 2010s, population growth meant that the average miles driven per person per day stayed roughly stable in many communities.[32] This plateau reflects factors documented in statewide research, including congestion constraints, higher housing costs influencing location choices and mode use, more infill-oriented land use planning, and an increase in telecommuting and alternative modes. In the Bay Area, VMT per capita in 2019 was only marginally higher than a decade prior, before declining sharply in 2020 due to the pandemic and partially rebounding thereafter. These trends demonstrate that per-capita VMT is responsive to policy and behavioral changes, which can slow or reverse growth over time. Throughout these shifts, Mountain View has maintained a consistent commitment to sustainability by adopting and implementing policies that support smart growth, infill development, and multimodal transportation, reinforcing its long-term strategy to reduce VMT.

Recent observed data from CARB's SB 150 Dashboard indicate that per-capita VMT in the Bay Area's MPO (MTC) increased relative to the 2005 baseline through 2019, with MTC showing the largest rise among the four largest MPOs, approximately 6 percent, followed by a sharp decline in 2020 and a subsequent rebound toward pre-pandemic levels in later years. CARB's 2022 Progress Report and the 2024 dashboard update similarly conclude that per-capita VMT and per-capita GHG from passenger travel have continue to trend upward at the regional scale, and that regions are not yet on track to meet SB 375 targets.[33]

However, new dynamics in transportation are emerging that complicate efforts to reduce VMT. The rise of transportation network companies (RIDESHAREs) like Uber and Lyft has added vehicle miles on city streets that were not present a decade ago. A UC Davis study found that "*49% to 61% of ride-hailing trips would have not been made at all, or by walking, biking, or transit" (Clewlow & Mishra, 2017, p.10)*[34]*.* This substitution effect, combined with "deadheading" (miles traveled without passengers), substantially increases total VMT from ride-hailing activity. Research shows that ride-

[32] Metropolitan Transportation Commission & Association of Bay Area Governments. (2025, June). Daily Miles Traveled. Vital Signs. Retrieved [07/28/2025], from https://vitalsigns.mtc.ca.gov/indicators/daily-miles-traveled

[33] California Air Resources Board. (2024, October 28). *SB 150 dashboard* (Tracking progress: Sustainable communities). Retrieved October 7, 2025, from https://ww2.arb.ca.gov/resources/documents/tracking-progress.

[34] Clewlow, R. R., & Mishra, G. S. (2017). Disruptive Transportation: The Adoption, Utilization, and Impacts of Ride-Hailing in the United States. UC Davis Institute of Transportation Studies.

hail users roughly doubled their total VMT compared to the travel modes they replaced, deadheading alone accounting for up to ~48% of a TNC driver's mileage in dense cities.[35]

Similarly, the adoption of electric vehicles (EVs) – while crucial for reducing greenhouse gas emissions – does not directly reduce VMT. Work-from-home patterns add further uncertainty: research shows that "*telecommuting has long been touted as a potential solution to chronic transportation problems like traffic congestion and vehicle emissions, but the research has consistently found that it is more likely to increase, rather than decrease, overall driving among remote workers*" (Salon, Circella, & Mokhtarian, 2023, p. 2).[36] In addition, congestion relief from fewer commuters on the road can make driving more attractive for others, especially in places like Mountain View where travel demand is relatively elastic. In such context, lower congestion can paradoxically encourage additional driving.

Neither RIDESHARE-induced travel nor any rebound effects from EV usage were fully accounted for in older travel forecasts. These trends imply that achieving VMT reductions is even more challenging: even if per capita rates were flat in the recent past, the future could see upward pressure on VMT from such factors, unless strong countervailing policies are in place.

Regional Housing Shortfalls and VMT Pressures

While the preceding discussion focused on regional and statewide travel behavior trends, it is also important to consider how housing production patterns influence cumulative VMT outcomes. This section expands on those broader dynamics by examining the structural jobs-housing imbalance in Mountain View and the surrounding region, which serves as a key driver of long-stance commuting and elevated VMT. From a cumulative impact standpoint, Mountain View's long standing jobs-housing imbalance illustrates how insufficient housing production-locally and regionally-has contributed to persistently high VMT. The city has added jobs far faster than housing for many years, resulting in long commutes for a large share of its workforce. Many employees live outside of the City and face longer trip lengths, driving up VMT. Local VMT metrics reflect this imbalance.

Mountain View's average VMT per resident and per employee remain above the regional average in many areas, and progress in lowering these rates has been modest. Even with numerous transportation demand management programs and transit improvements, the City's overall total VMT per service population is projected to have a modest decrease. The root cause-housing scarcity near jobs-remains unresolved.

VTA's recent *Equitable VMT Mitigation Program for Santa Clara County*[37] (March 2025) report confirms that, under current trajectories, only minor reductions in average total VMT rates are likely, even with extensive mitigation programs. Additional housing in job-rich cities is a critical need to bend the curve on VMT. Mountain View has acknowledged this with several policies and programs.

While regional housing shortfalls will continue to place upward pressure on VMT, the Project directly reduces barriers to higher-density residential development and encourages growth throughout

[35] Schaller, B. (2021). Can sharing a ride make for less traffic? Evidence from Uber and Lyft and implications for cities. Transport Policy, 102, 1–10. https://doi.org/10.1016/j.tranpol.2020.12.015

[36] Salon, D., Circella, G., & Mokhtarian, P. (2023). The Future of Working Away from Work: A Research Synthesis. UCLA Institute of Transportation Studies.

[37] Santa Clara Valley Transportation Authority. (2023). *Equitable VMT mitigation program for Santa Clara County: Final report and program framework.* Santa Clara Valley Transportation Authority. https://www.vta.org/projects/equitable-vmt-mitigation-program-santa-clara-county

Mountain View, especially along transit corridors. By expanding allowable densities in R3 districts, the Project enables more infill housing throughout the city and reducing VMT rates. . Its zoning framework supports multifamily housing and adds flexibility for small neighborhood-serving uses.

Together, these changes strengthen the City's ability to accommodate new housing near jobs and transit, which is the most effective long-term strategy for lowering per-capita VMT and minimizing the VMT growth on roadways in the region.

The bottom line: Mountain View and the region have not built enough housing near jobs to counteract growing commute distances. The Project is a significant step forward, but its full VMT benefits depend on robust implementation—actual construction of units (especially affordable ones), new locally-serving commercial uses, and pedestrian- and bicycle-friendly development.

The City's existing policy framework helps mitigate transportation impacts by limiting employment growth in certain areas, requiring balanced office and residential development, and collecting jobs-housing linkage fees. Real-world examples like the East Whisman Precise Plan and the North Bayshore Precise Plan show that aggressive housing policy can function as transportation mitigation in a jobs-rich city.

In conclusion, current VMT trends and policies confirm that Mountain View's cumulative VMT impact will remain significant without continued and enhanced efforts to align housing supply with employment. The R3 project helps address this imbalance, but given regional growth pressures and travel behavior trends, a significant cumulative VMT impact is still identified – calling for ongoing mitigation through housing, transportation, and demand-management initiatives to truly bend the curve of VMT in the long term.

Cumulative VMT Impact Conclusion

Under cumulative conditions, the effect of adding thousands of new homes is nuanced. On one hand, the Project will improve jobs-housing balance and promote infill development=both of which reduce VMT per capita compared to the adopted cumulative scenario. On the other hand, the sheer scale of growth (up to 10,000 to 16,000 new units and residents) means that boundary VMT in the region may still increase in absolute terms.

There are also uncertainties-such as the exact locations of future development, evolving travel behavior trends, emerging technologies that reduce resistance to driving; and future transit and other infrastructure improvements-that could lead influence per-capita VMT in unpredictable ways.

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. In the absent of project-specific travel modeling, the City has taken a conservative approach: it concludes that the R3 Project could make a cumulatively considerable contribution to regional VMT under future conditions.

This determination aligns with the City's General Plan EIR, which found buildout of planned growth (now augmented by this project) would result in significant and unavoidable transportation impacts.

Therefore, the cumulative transportation impact of the Project is considered ***potentially significant***. The following section discusses mitigation strategies that the city can employ to reduce this impact to the extent feasible.

Cumulative VMT Mitigation

Although a legislative act like a zoning code update cannot include on-site mitigations, the City can continue to address cumulative VMT impacts through its adopted VMT Policy and project-level review process. The mitigation strategies outlined below fall within the City's existing VMT mitigation framework and are designed to reduce per-capita VMT over time:

Tier 1 – Project Characteristics

Encouraging increased residential density—as envisioned by the R3 Project—can reduce VMT per capita by shortening trip distances and supporting alternative transportation modes. Additional strategies include:

- Promoting mixed-use development.
- Including affordable or below-market-rate housing to reduce displacement and keep lower-income residents near jobs.

Example: Strengthening the jobs-housing linkage through updated linkage fees and advancing affordable housing and anti-displacement measures to reduce long commutes and regional VMT.

Tier 2 – Multi-Modal Network Improvements

Implement infrastructure that supports walking, biking, and transit use. This includes:

- Bicycle lanes, pedestrian upgrades, traffic calming, and enhanced transit access.
- Coordinating with City staff to prioritize projects already identified in adopted City plans.

Example: Expanding transit and active transportation options in R3 areas to maintain low per-capita VMT as the population grows.

Tier 3 – Parking

Use parking policies known to reduce VMT, such as:

- Right-sizing parking supply.
- Expanding end-of-trip bicycle facilities.
- Pairing reduced on-site parking with residential permit programs in surrounding neighborhoods.

Tier 4 – Travel Demand Management (TDM)

Deploy TDM measures to reduce reliance on single-occupancy vehicles, including:

- School and work carpools, bike-share, car-share, and trip reduction campaigns.
- Parking cash-out, subsidized transit, telecommuting, alternative work schedules, and employer shuttles.
- Paid or unbundled parking and vanpool subsidies.

Example: Requiring TDM measures in new R3 housing—such as transit subsidies, car-share programs, and unbundled parking—to reduce vehicle use. These efforts can be paired with adaptive management strategies that monitor VMT trends and adjust policies as needed to meet long-term reduction goals.

Although the Project is subject to AB 130 housing mitigation fee requirements, payment of this fee alone would not reduce the Project's cumulative VMT impact to a less-than-significant level under CEQA. Because CEQA requires mitigation to be specific, enforceable, and demonstrably effective, reliance on the AB 130 fee cannot eliminate the Project's potentially significant cumulative transportation impact.[38,39]

Final Findings and Path Forward

Consistent with the City's General Plan EIR, the key long-term strategy for reducing cumulative VMT remains facilitating additional infill housing especially near transit and in low-VMT areas alongside the City's existing and ongoing VMT policy.

Through the above strategies, Mountain View can substantially lessen the Project's cumulative VMT impact. Many of these measures are already embedded in City policy or regional programs, and rigorous implementation will be essential. With aggressive mitigation and continued alignment with Plan Bay Area's Transit-Oriented Communities policies, the additional housing growth from the Project can likely be accommodated without increasing per-capita VMT in the long term.

Nevertheless, given the uncertainties discussed, the cumulative VMT impact is classified as a ***significant and unavoidable impact with mitigation***. The City's proactive commitment to mitigation will be critical to ensure the Project ultimately furthers a reduction in regional VMT while providing much-needed housing.

[38] Cox, Castle & Nicholson LLP; Another Fee-Based Approach to CEQA Mitigation? California Creates New Mitigation Option for Vehicle Miles Traveled but Significant Questions Remain, January 22, 2025.

[39] Elisa Barbour; Repurposing Impact Fee Programs Since Adoption of SB 743, University of California Institute of Transportation Studies, 2022.

Appendix A: Summary of Sketch-Level VMT Tools

Fehr & Peers

A-1: Considerations for Travel Forecasting Models

1. Model Selection Guidance

The National Cooperative Highway Research Program *(NCHRP) Report 765, Analytical Travel Forecasting Approaches for Project-Level Planning and Design*, Transportation Research Board (TRB) (2014) is a detailed resource with many applicable sections. A few highlights related to forecasting expectations for models are listed below:

- A travel forecasting model should be sensitive to the policies and projects that the model is expected to help evaluate.
- Project-level travel forecasts should be validated following the guidelines of the *Travel Model Validation and Reasonableness Checking Manual*, *Second Edition,* from the Federal Highway Administration (FHWA).
- The model should be recalibrated frequently to ensure that validation standards are continuously met.

If used as the primary basis for calculating VMT, selection of an appropriate travel forecasting model is an important step. It is important for consistency because the model used to develop VMT thresholds should also be used to evaluate a project's direct and cumulative VMT impacts. The OPR *Technical Advisory* emphasizes this point (*Technical Advisory: On Evaluating Transportation Impacts in CEQA*, page 6).

> *"It is critical, however, that the agency be consistent in its VMT measurement approach throughout the analysis to maintain an "apples-to-apples" comparison. For example, if the agency uses a home-based VMT for the threshold, it should also be [sic] use home-based VMT for calculating project VMT and VMT reduction due to mitigation measures."*

UC Berkeley's Terner Center extends the policy dimension by showing why the choice of VMT model and baseline matters for housing and climate outcomes. The commentary underscores that residential VMT per person is the relevant metric for housing policy and that infill residential development tends to reduce carbon pollution by enabling shorter, fewer auto trips.[1] The authors find that different models and baselines can change which neighborhoods are designated "low-VMT," which in turn affects CEQA streamlining and fair-housing objectives; they recommend state investment in validation and transparency and suggest using a statewide baseline where regional averages are unusually low to better align climate and housing production goals. For defensibility, this implies agencies should disclose model selection rationale, validate against observed data where feasible, and explain how baseline choices affect screening determinations for infill projects.

Using a travel forecasting model has some advantages over other methods, such as using sketch models or spreadsheet tools, because a travel model is better able to account for both project-generated VMT and the project's effect on total area-wide VMT. A spreadsheet tool cannot evaluate project's effect on VMT. Both project-generated and the project's effect on total VMT are important in a CEQA analysis. In addition, travel forecasting models can help identify the effects of transportation projects on VMT: for instance, would adding an additional vehicle lane induce new VMT, or cause people to drive who otherwise wouldn't have?

2. Modeling and Non-Modeling Approaches

A travel forecasting model should have a base year and a future year, which are needed to evaluate project and cumulative impacts. Lead agencies have discretion to choose their analysis methods. However, if they prefer to establish thresholds that rely on regional averages of baseline VMT, then the travel forecasting model must cover a large enough area. The OPR *Technical Advisory* cites the importance of not truncating trip lengths based on travel forecasting model or political boundaries:

> Considerations for All Projects. Lead agencies should not truncate any VMT analysis because of jurisdictional or other boundaries, for example, by failing to count the portion of a trip that falls outside the jurisdiction or by discounting the VMT from a trip that crosses a jurisdictional boundary. CEQA requires environmental analyses to reflect a "good faith effort at full disclosure." (CEQA Guidelines, § 15151.) Thus, where methodologies exist that can estimate the full extent of vehicle travel from a project, the lead agency should apply them to do so. Where those VMT effects will grow over time, analyses should consider both a project's short-term and long-term effects on VMT. (Quote from page 6 of the Technical Advisory: On Evaluating Transportation Impacts in CEQA, December 2018).

Most regional travel forecasting models used by metropolitan planning organizations (MPOs) have sufficient geographic coverage to produce these estimates, although they typically truncate trip lengths at the model boundary (usually meaning that inter-regional VMT is not fully captured without adjustments in the VMT forecasts). This can be an important limitation for cities or counties at the edge of the travel forecasting model boundary.

In addition to concerns related to truncating trips, most models cannot analyze transportation effects at the parcel or project level because the smallest unit of land use in a travel model is the transportation analysis zone.[2] These TAZ boundaries are not artificial; however, substantial effort is applied when designing a TAZ system boundaries and land use inputs. While a project may involve either one or several parcels, the smallest unit for which a VMT analysis should be conducted on (absent supporting substantial evidence of statistical validity) is the TAZ. As such, it does present a limitation for analysis of smaller areas at the sub-TAZ level. The response to this type of limitation is to modify the model to add detail and split TAZs.

Should an analyst identify noise or anomalies in the VMT results, further testing and investigation will be needed to diagnose and understand the cause and prepare an appropriate solution. The solution may result in minor refinements to the TAZ structure (as noted above), updating land use or transportation network inputs, or more comprehensive improvements to ensure that the travel model is sufficiently accurate and sensitive to local-scale applications.

The TAZ size also influences the types of streets vehicle traffic is typically assigned to. For a regional forecasting model, an arterial or minor arterial is the lowest street level that traffic is assigned to; for a sub-regional/local travel forecasting model, it is typically a collector or possibly local streets. As such, for most travel forecasting model uses, VMT on smaller streets is not calculated.

These limitations underscore why sketch-level VMT tools have become an essential complement to traditional regional travel models. Because they rely on parcel-scale land use data and empirically derived relationships between the built environment and travel behavior, these tools can capture local effects that zone-based models often miss. They are particularly valuable for screening CEQA projects, evaluating infill housing performance, or estimating VMT reduction potential from land use and design strategies without requiring a full model run. The table below summarizes several commonly used sketch-level VMT tools, their primary features, and appropriate use cases.

[1] Strangeway, R., & Subin, Z. (2025, April 4). *Aligning housing with climate goals: The importance of measuring VMT.* Terner Center for Housing Innovation, UC Berkeley. https://ternercenter.berkeley.edu/blog/aligning-housing-with-climate-goals-the-importance-of-measuring-vmt/

[2] As defined by *NCHRP Report 716, Travel Demand Forecasting: Parameters and Techniques*, TRB, 2012, "TAZ boundaries are usually major roadways, jurisdictional borders, and geographic boundaries and are defined by homogeneous land uses to the extent possible."

Table A-1: Overview of Sketch-Level VMT Tools for Screening and Analysis

Tool	Output & use	Key advantages	Key limitations	Typical CEQA use
Santa Clara County VMT Evaluation Tool	• Total VMT and screening. • Provides citywide and regionwide VMT metrics for a project. • Screens projects in Santa Clara County and estimates VMT reduction from selected TDM measures using VTA model data.	• Uses locally calibrated VTA travel model data. • Familiar to Santa Clara County reviewers. • Produces clear screening outputs.	• Localized to Santa Clara County. • Intended for single-site projects. • Does not evaluate induced travel or systemwide cumulative effects.	• Primary Bay Area screening for small and medium projects in Santa Clara County. • Initial VMT screening, including low-VMT location checks. • Not for large plans.
CalEEMod	• Project VMT as part of emissions modeling using ITE trip rates. • Can test limited mitigation inputs.	• Widely used in air quality analyses. • Straightforward interface with many input parameters.	• Uses default trip lengths and ITE rates that can misrepresent infill contexts. • No network sensitivity or internal capture. • Generally, not recommended as the primary method for SB 743 VMT analysis.	• Rough screening when no other tool is available, paired with caution. • Better suited to emissions calculations than VMT impact findings.
Sketch7	• Percent VMT change. • Applies elasticities for the "7 Ds" to estimate VMT changes from built-environment shifts.	• Simple inputs. • Explicitly reflects built-environment sensitivity. • Useful for with- and without-design comparisons.	• Reports percent change, not absolute VMT. • No explicit internal capture or TDM packages. • Requires local calibration for defensibility.	• Comparative screening of land use design alternatives. • Not for final VMT impact findings.
VMT Impact Tool (UC Davis)	• Percent VMT change for policy scenarios at regional or subarea scales.	• Useful for policy and scenario exploration. • Transparent elasticities.	• Not a site-specific project tool. • Limited treatment of TDM and internal capture.	• Exploratory scenario analysis for plans or policy memos. • Supplement to, *not a replacement for*, project screening.
GreenTRIP Connect (TransForm)	• Household VMT and GHG for residential projects. • Tests a fixed set of residential TDM strategies.	• Tailored to infill and affordable housing. • User friendly. • Communicates TDM benefits clearly.	• Residential focus only. • Limited menu of measures. • Custom TDM requires supplemental analysis.	• Screening for residential projects, including affordable and transit-oriented proposals. • Documenting TDM benefits as part of mitigation.
MXD / MXD+ (EPA)	• Adjusted trip generation for mixed-use projects; VMT derived by applying trip lengths to adjusted trips.	• Better reflects internal capture and non-auto trips than raw ITE rates.	• Does not produce VMT without external trip length inputs. • No assignment or rerouting.	• Pre-screening internal capture for mixed use. • Pair with regional model or observed trip length data to compute VMT.
UrbanFootprint (scenario GIS)	• Scenario VMT for plan alternatives using embedded travel behavior models.	• Handles multi-use, large-area scenarios. • GIS-based with map outputs.	• Higher setup effort. • No detailed network assignment. • Limited TDM representation beyond land use.	• General Plan or housing element alternatives. • Not practical for routine project screening.
Envision Tomorrow	• Scenario VMT for plan-level alternatives.	• Interactive comparison of scenarios with multiple indicators.	• Similar setup and scope to UrbanFootprint. • Requires expertise.	• Plan-level screening and alternatives evaluation.
California Smart-Growth Trip Generation Tool	• Adjusted trip rates for smart-growth features. • VMT requires separate trip lengths.	• Easy to apply for basic trip reductions.	• Dated. • Trips only, not VMT. • Limited alignment with current thresholds.	• Background reference to support reduced trip rates in smart-growth contexts. • Not a standalone VMT method.
TRIMMS	• Percent VMT reduction and new totals from TDM packages.	• Consolidates many TDM strategies. • Quick what-if testing.	• General elasticities may not match local behavior. • No spatial component. • Requires local validation for CEQA.	• Screening TDM bundles to inform mitigation menus. • Supplement to model-based or locally benchmarked VMT estimates.
VMT+ (Fehr & Peers)	• Sketch VMT and GHG calculator for user-defined land uses.	• Rapid inputs and custom scenarios statewide.	• Relies on ITE unless user supplies context-specific adjustments. • Newer tool; requires benchmarking to local models.	• Rapid screening and cross-checks. • Supplement to model outputs for reasonableness.
TDM+ (CAPCOA, 2021)	• Percent VMT reduction from combined TDM measures.	• Updated factors and bundling logic that reduce double counting.	• Produces percent reduction, not post-project VMT. • Requires defensible base VMT and careful documentation.	• Mitigation planning to demonstrate achievable VMT reductions for significant impacts.

Source: Fehr & Peers, 2025.

Appendix B: Qualitative Infill Housing VMT Assessment Approach

Fehr & Peers

Memo

Date: May 30, 2025

To: Eric Anderson, City of Mountain View

From: Daniel Rubins, Mackenzie Watten, Elynor Zhou, and Julie Morgan

Subject: City of Mountain View R3 Zoning Code Update – Qualitative VMT Assessment Approach

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The City has expressed a desire for a qualitative non-modeling VMT assessment approach. This method evaluates the project's potential impacts on vehicle miles traveled (VMT) without relying solely on quantitative models or data. Instead, it uses descriptive and contextual analysis to understand the factors that may influence VMT.

This memorandum provides a brief background and description of the qualitative VMT assessment approach. Once the City approves this methodology, we will prepare an updated scope of work, fee, and schedule to conduct the transportation analysis for the environmental review.

Background

As stated in the City's *R3 Zoning District Update – Goals, Phasing, Subdistricts, and Location Criteria* staff report (April 2024), the R3 Zoning Code Update was initiated by City Council with the goal to "…review and propose revisions to the R3 Zone standards that consider form-based zoning, incentivize stacked flats, and updated row housing guidelines."

City staff and the project team will complete a project description for the environmental analysis by approximately May/June 2025. Because this project involves a zoning change, there is an inherent uncertainty about what types, quantity, and location of future residential development will actually occur. However, the general characteristics about the project are known:

- The R3 residential zone encompasses approximately 50% of all residential areas in Mountain View. (Refer to the attached map and project description).
- City staff estimates between 10,000 and 16,000 dwelling units could be built as a result of this zoning code update.
- The R3 rezoning update defines a range of residential types from townhomes to stacked flats.
- The code update could affect many locations within the City.
- The R3 zoning code update does not address the conversion of affordable housing to market rate housing. Rather, the City is working on a SB-330 style replacement ordinance, tenant relocation requirements and other displacement mitigations. This ordinance may not be available until SB 330 sunsets in 2030.

- The residential development in the R3 zone was not included in the City's most recent Housing Element (and therefore, the additional units that could be built under the R3 rezoning were not part of meeting the City's most recent RHNA targets).
- The city has not considered how additional residential development in Mountain View would influence the *Final Plan Bay Area 2050* land use projections and VMT for this area.

The SCC VMT Evaluation Tool

The City of Mountain View adopted a set of VMT methods and procedures that are to be applied to land use projects in the City (June 2020) as well as additional direction in the *Multi-Modal Transportation Analysis Handbook* (February 2021); both guides suggest the use of the Santa Clara Countywide VMT Evaluation Tool (SCC VMT Tool) web application, which allows an analyst to conduct baseline VMT screening and VMT reduction analysis for small to medium size land use projects. A user of this tool can perform multiple functions, such as:

- Screening projects from further VMT analysis
- Estimating the project generated VMT rate
- Estimating VMT reductions from transportation demand management (TDM) strategies

The tool is designed for the following land use types:

- Residential, office, or industrial land uses
- Any of the land uses above in combination with each other
- Any of the land uses above combined with local-serving retail space

The SCC VMT Tool uses VMT data produced from the most recent run of the Santa Clara Valley Transportation Authority (VTA)-City/County Association of Governments of San Mateo County (C/CAG) Bi-County Model ("VTA Travel Model"). The SCC VMT Tool is designed to evaluate VMT for a small to medium-sized land use project in a single location.

Low-VMT Generating Area Map Screening

The State Office of Planning and Research's *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) outlines—and the City of Mountain View applies—a "map-based" screening method. Under this approach, projects located in low-VMT-generating areas (defined by metrics such as VMT per capita) may only require a qualitative discussion, provided they align with planning best practices for infill residential development.

A low-VMT-generating area is generally one where the VMT per capita under Existing Conditions (based on a travel model run) falls below the impact threshold adopted by the lead agency. The rationale for this screening method is that future residents, employees, and visitors are expected to exhibit similar travel behavior to current populations in the area. Therefore, it is reasonable to assume that a new project that has similar characteristics as the existing development in that area will generate VMT at a similarly low rate. In other words, while a project will generate some new VMT, its location in a low-VMT-generating area means it will produce less VMT than if it were located

elsewhere. This contributes to a net benefit by incrementally lowering the citywide, countywide, or regional VMT rate compared to alternative locations.

Qualitative VMT Approach for the R3 Zoning Code Update

The SCC VMT Evaluation Tool and map-based screening approaches are generally effective for small projects that align with existing development patterns and are located in places where cumulative VMT trends are declining. However, the R3 Zoning Code Update is a large-scale initiative that will significantly alter the residential mix and expand residential land use across the entire city of Mountain View. Further, there is evidence of increasing VMT trends in both Mountain View specifically and in California as a whole. As a result of these considerations, this zoning code update project is not a suitable use case for the SCC VMT Tool or map-based screening procedures, and the environmental review experts indicate that it is not eligible for any generalized CEQA exemptions.

Instead, the City wants to proceed with a qualitative VMT analysis that can be sensitive to the project's unique characteristics-particularly the uncertainty around the amount and location of future housing. Our proposed qualitative approach evaluates existing conditions using descriptive methods, contextual analysis, and substantial evidence to assess potential VMT impacts.

Key focus areas that could affect the project's VMT outcomes, as described in the OPR *Technical Advisory* and the *CEQA Statute & Guidelines*, include:

- Potential for conversion of existing affordable housing to a smaller number of moderate- or high-income housing units (OPR TA pages 14, 15, 17 and 18).
- Potential for new residential uses to be located in low VMT areas (OPR TA pages 15, and 16).
- Additional housing units beyond what was considered with the Regional Transportation Plan / Sustainable Community Strategy (OPR TA page 15).

We will also incorporate findings from the City's General Plan EIR, which identified a long-term increase in VMT rates due to faster non-residential growth. This will inform our qualitative cumulative impact analysis.

To finalize the VMT impact determination, we will consider:

- Regional VMT trends[1]
- The reliability of current low-VMT area maps, particularly as it relates to predictions of future conditions
- Broader influences such as the rise of ride-share services, declining transit use, demographic shifts, and the conversion of affordable housing to market-rate units

Additionally, we will address how California's population outflow may contribute to increased VMT generation. These social, economic, and technological trends will be integrated into the analysis to ensure a comprehensive evaluation.

[1] SB 150 Dashboard – Tracking Progress – Sustainable Communities | California Air Resources Board: https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/sb-150-dashboard-tracking-progress-sustainable, accessed April 2025.

The steps of the qualitative VMT approach include:

1. Summary of Relevant Regional Circulation and Transportation Plans: A summary of the regional circulation and transportation plans will be prepared to provide baseline policy context and used as reference.
2. Summary of California's VMT Mapping and Modeling: To support the use of a qualitative VMT assessment for the R3 Zoning Code Update, we will summarize the current state of VMT mapping and modeling in California. This summary will highlight the limitations of existing tools—such as their design for small, site-specific projects—and explain why they are not well-suited for a citywide rezoning effort with uncertain development patterns. The review will draw on academic research and policy studies, including:
    a. UC Davis and UC Berkeley research on sketch-level VMT tools, focusing on output characteristics and technical and legal defensibility[2,3] San José State University's (SJSU), Mineta Transportation Institute report on consistent VMT modeling across California.[4]
    b. UC Berkeley's Terner Center report on aligning housing policy with climate goals, emphasizing the importance of VMT metrics and infill residential.[5]

    This context helps demonstrate that a qualitative approach is more appropriate for this project type, given its scale, complexity, and the limitations of available modeling tools.
3. Initial Impact Determination for Project Generated VMT: The R3 Zoning Code update project will be a large project that will modify the residential mix and increase the residential land use supply at many locations throughout Mountain View. This step will include a summary of a wide body of research that suggests multi-family infill developments that are denser than the existing neighborhood can be expected to generate less VMT than that of the surrounding neighborhood.[6,7,8] The initial determination will consider:
    a. Affordable housing conversion: Whether the project converts affordable housing to market-rate units, which could offset density benefits.
    b. Low VMT rate zone: Whether the project puts new housing units in low VMT generation zones, considering residential density changes and available VMT mapping.[9]
    c. Housing Increase Impact: Whether the project aligns with MTC's Plan Bay Area – the Regional Transportation Plan and Sustainable Community Strategy policy outcomes and its supporting Transit-Oriented Communities (TOC) Policy.

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[2] Amy Lee, Kevin Fang, and Susan Handy; "Evaluation of Sketch-Level Vehicle Miles Traveled (VMT) Quantification Tools," National Center for Sustainable Transportation, August 2017.

[3] Elisa Barbour, Dan Chatman, Sarah Doggett, Stella Yip, and Manuel Santana; "SB 743 implementation: Challenges and Opportunities [Draft Final]," June 5, 2018.

[4] Serena Alexander, Shams Tanvir, Syed Tanvi Ahmed, and Annie Jones, "Consistent VMT Mapping and Modeling in California: How Can We Better Assess the VMT Impacts of State and Local Transportation Projects?", December 2024.

[5] Rachel Strangeway, and Zack Subin, "Aligning Housing with Climate Goals: The Importance of Measuring VMT," April 2025.

[6] California Air Pollution Control Officers Association (CAPCOA) 2021 *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity.*

[7] CAPCOA Handbook for Analyzing Greenhouse Gas Emission Reduction, Assessing Climate Vulnerabilities, and Advancing Health and Equity Strategy T-1. Increase Residential Density.

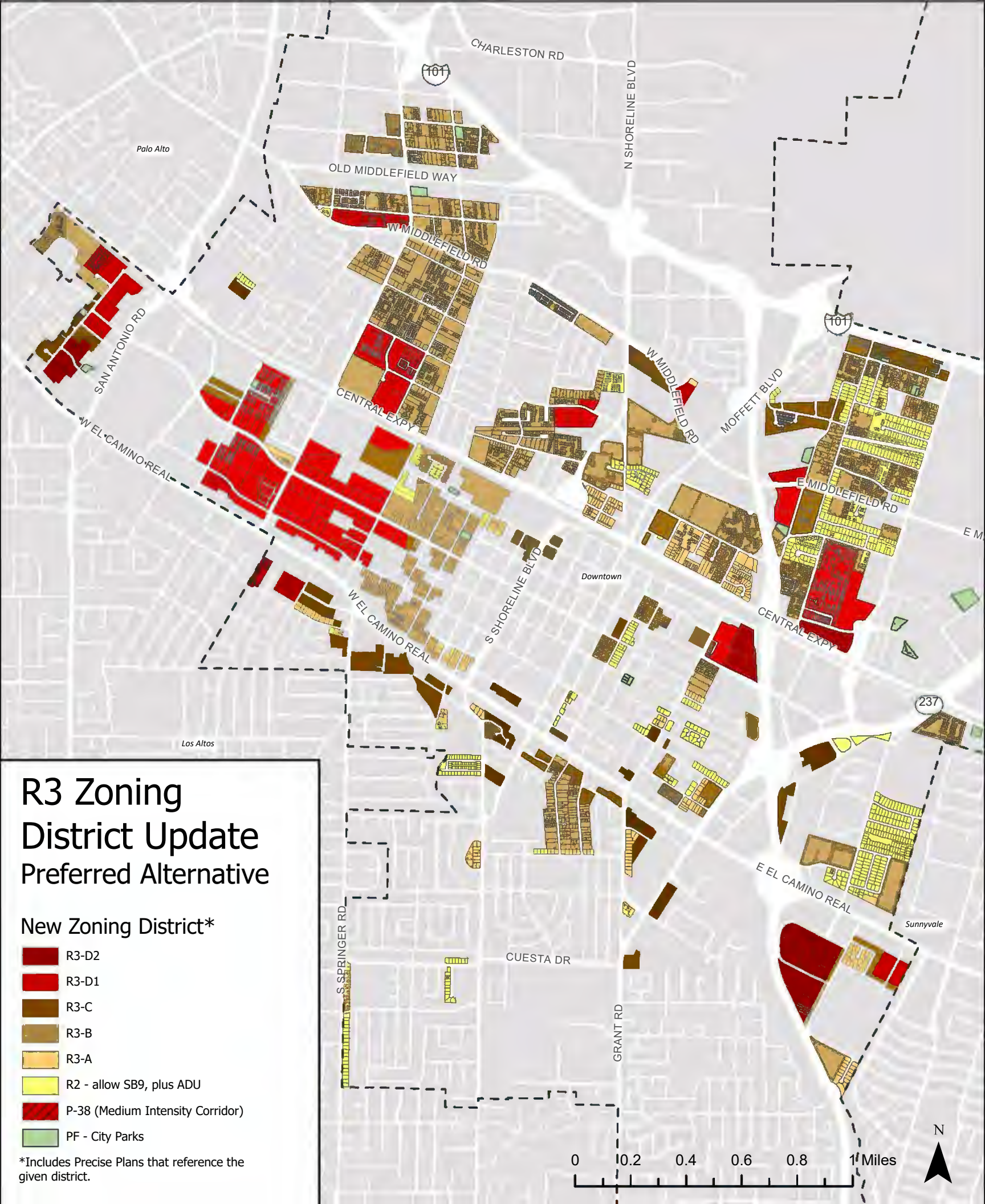
[8] SB 743 Policy Adoption Technical Assistance Program, accessed April 2025.

[9] While we are not using VMT data for this analysis, we will assume at least some of the potential project locations will not be in a low-VMT generating.

4. Initial Cumulative VMT Impact Determination: The City of Mountain View's General Plan identified a VMT impact with the implementation of the General Plan because of the increased population and employment growth. This step will evaluate the cumulative effects the R3 zoning code adding more residential development and changing the residential mix using metrics like the jobs-to-housing ratio, the jobs-housing linkage fees charged by Mountain View, the jobs-housing linkage strategy in the East Whisman Precise Plan and other jobs/housing policies.
5. Mitigation: If an impact is identified, we will discuss potential feasible mitigation measures including Housing Element policies, infill development benefits, and affordable housing displacement strategies.[10]
6. Consider Additional Information: To demonstrate a good faith effort for CEQA purposes, we will discuss available evidence about regional and statewide VMT trends, and acknowledge limitations of this analysis in being able to predict the effects of emerging technological, social, and demographic trends.
7. Final Impact Determination: A final impact determination will be based on the proposed mitigation and additional information, particularly the project's potential to limit displacement and increase residential density.
8. Non-VMT Impact Analysis: We will discuss this project's consistency or level of conflict with existing plans and policies. It should be acknowledged that the project definition lacks sufficient information to perform a detailed safety and hazards assessment or an emergency vehicle access impact analysis beyond what is already included in the *City of Mountain View Draft 2030 General Plan and Greenhouse Gas Reduction Program Environmental Impact Report* (2011).

Attached: R3 Zoning District Update: Preferred Alternative Map and Project Summary

[10] This memo uses the term 'feasible,' which as defined in the *CEQA Statute & Guidelines* Section 15364 "…means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."



R3 Zoning District Update

Preferred Alternative

New Zoning District*

- R3-D2
- R3-D1
- R3-C
- R3-B
- R3-A
- R2 - allow SB9, plus ADU
- P-38 (Medium Intensity Corridor)
- PF - City Parks

*Includes Precise Plans that reference the given district.

Project background and description as provided by Eric Anderson via email on Thursday May 29, 2025.

Project initiated in 2019 – to "review and propose revisions to the R3 Zone standards that consider form-based zoning, incentivizing stacked flats, and updated rowhouse guidelines."

Project Goals (per Council):

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.

Project now also includes the following Housing Element Programs:

- Program 1.3(a): "Conduct a development prototype study, update definitions as necessary for consistency between plans and districts, and revise multi-family development standards in major districts (including R3) and Precise Plans to ensure projects can, at minimum, meet their allowed density and are economically feasible where possible through reductions of physical development standards. Economic feasibility and the cumulative effects of standards will be inputs in the reduction of standards. Where appropriate, calibrate standards to lot size. Focus on standards with the greatest feasibility impacts on underutilized sites, such as open area, parking, and building coverage."
- Program 1.3(c): "Ensure that the Zoning Code is updated to reflect densities and other standards as required by state law (e.g., SB 478)."
- Program 1.3(e): "Study live-work as an allowed residential use near retail areas, major corridors, and other viable locations."
- Program 1.3(h): "Conduct a review of R2-zoned properties. For all properties, upzone to either allow density greater than typical R1 properties under SB 9 (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."
- Program 1.5: "Update the Zoning Ordinance to allow replacement of multifamily development in the R1 and R2 districts with non-conforming density to preserve units above the allowed density in the underlying Zone."

Project will also address consistency with recent state laws:

- Updates to State Density Bonus Law
- Updates to the Housing Accountability Act
- SB 478 (2021)
- SB 684 (2023) and SB 1123 (2024)
- SB 1211 (2024)

Expected capacity – 10,000–16,000 units (8,000–12,500 increase over ~2,000–3,500 existing capacity)

The project will include several new and amended zoning districts. In some cases, these districts would be referenced within an existing precise plan, rather than shown directly on the zoning map.

- R3–D2: a new district allowing approximately 75 to 110 units per acre. This district would be an increase in allowed density.
- R3–D1: a new district allowing approximately 50 to 75 units per acre. This district would be an increase in allowed density.
- R3–C: a new district allowing approximately 35 units per acre. This district would include new development standards but would not be an increase in density, as it would apply to locations with a previous General Plan designation of Medium High Density Residential, which allowed 35 units per acre.
- R3–B: a new district allowing approximately 25 units per acre. This district would include new development standards but would not be an increase in density, as it would apply to locations with a previous General Plan designation of Medium Density Residential, which allowed 25 units per acre.
- R3–A: a new district allowing approximately 15–20 units per acre. This district would be an increase in allowed density relative to the current R2 areas where it would apply.
- R2: an existing district allowing approximately 12 units per acre, that would be amended to allow opportunity for SB9, plus ADU, pursuant to Housing Element Program 1.3(h).
- Several condominium sites in the El Camino Real Precise Plan (P–38) would be amended to "Medium Intensity Corridor" in the Precise Plan to be consistent with the General Plan.
- In addition, several residentially zoned sites that include City parks may also be rezoned to PF (Public Facilities) with this project.

Appendix C: Residential Infill Development Screening Criteria for SB 743

ASSOCIATION OF BAY AREA GOVERNMENTS
METROPOLITAN TRANSPORTATION COMMISSION

FEHR PEERS

SB 743 POLICY ADOPTION TECHNICAL ASSISTANCE PROGRAM

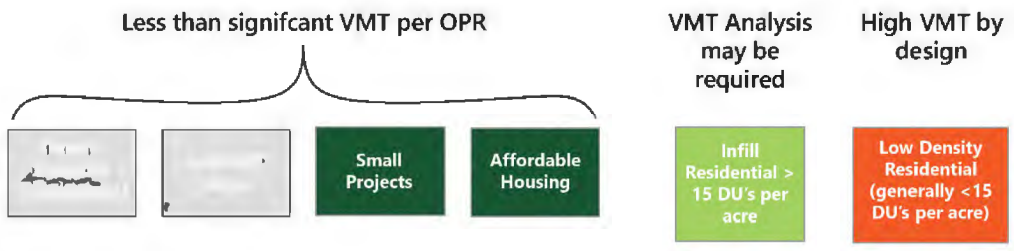
ESTABLISHING AN INFILL AND AFFORDABLE HOUSING SCREEN

Summary

When adopting VMT thresholds, screening criteria, or VMT/TIA guidelines, lead agencies could consider VMT screening criteria for qualifying infill housing projects. Suburban and rural lead agencies in particular can consider this screen when transit services are not available and the model data supporting low VMT areas are limited or unreliable. Establishing a VMT screening criteria for infill housing would be consistent with OPR's guidance to use alternate approaches when use of a calibrated travel demand model is unavailable. This would streamline how lead agencies approach VMT analysis and clarify the types of housing development that align a city's housing production goals with state climate goals. To aid in this process, OPR recently released a tool, Site Check[1], which is a free and public tool aimed to help users understand what streamlining options and/or exemptions under CEQA apply to any parcel in California. **Figure 1** shows how the screening options for suburban and rural jurisdictions can be expanded.

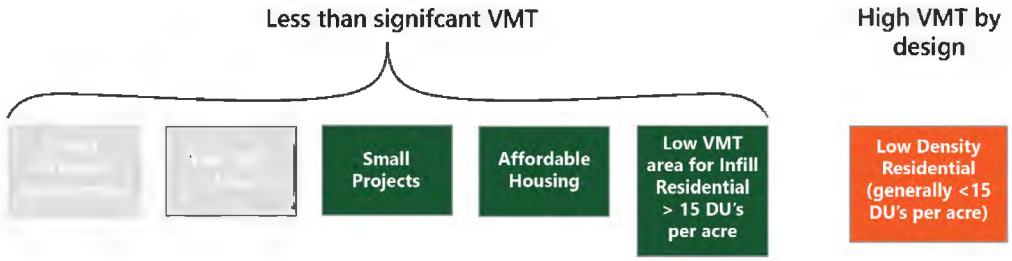
Figure 1: VMT Screening Options for Suburban and Rural Jurisdictions

Existing Screening Options without TOD and Inadequate Low VMT Areas



[1] Site Check Walkthrough

Potential Future Screening Options



* OPR = California Attorney General's Office of Planning and Research

The sections below provide more detail on **Figure 1** as well as the steps and substantial evidence lead agencies can consider when pursuing this approach.

Why Consider an Infill Housing or Mixed Use Screen

In the pursuit of California's housing, transportation, and climate goals, the interplay between constraints created by the application of CEQA to housing developments and the need to promote infill housing has emerged as a critical nexus that local jurisdictions must navigate. This guide explores how local jurisdictions can align local vehicle miles traveled (VMT) and housing policies through the establishment of General Plan policies, VMT thresholds, or screening criteria relating to infill residential or residential mixed-use multi-family projects[2] (referred to as "infill housing" going forward, although they may include up to a third mixed-use component). This guide is intended to address common challenges heard during MTC's VMT Policy Adoption Technical Assistance (SB 743) program[3] by helping lead agencies with limited high-quality transit service or low VMT areas determine an appropriate VMT analysis approach for infill housing sites. While some of the approaches and research presented in this guide could apply to commercial or other land uses, this guide focuses on housing given the close alignment of local infill housing with state climate and housing production goals while infill commercial may need to consider local jobs/housing imbalances and other factors when adopting new VMT screening criteria.

Lead agencies are responsible for adopting thresholds of significance for VMT based on local values and conditions. In 2013, Senate Bill (SB) 743 and subsequent guidance from the California Attorney General's Office of Planning and Research (OPR) established VMT as the preferred metric to balance the "needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of GHG emissions." Lead agencies often rely on regional travel demand models to understand the types of land uses and locations that could result in a significant impact on the environment associated with VMT. However, some suburban and rural jurisdictions face challenges in the application of VMT due to the complexity of regional travel demand models, lack of sensitivity of regional models to the local travel characteristics of infill and affordable housing, and uncertainty related to post-COVID travel patterns. Further, the placement of multi-family housing in areas

[2] Defined by the California PRC §65589.5.(h)(2)(B) "Mixed-use developments consisting of residential and nonresidential uses with at least two-thirds of the square footage designated for residential use."

[3] Based on technical assistance provided between 2022 and 2023. For more information on the program, visit: https://abag.ca.gov/technical-assistance/sb-743-los-vmt-transition-program-overview

with existing low density land use patterns skew off-the-shelf model data that jurisdictions typically use to identify low VMT areas. This guide presents how the project characteristics inherent to multi-family development lead to lower levels of VMT when compared to low density land uses, such as through the increased density, proximity to amenities and services, or the provision of affordable housing. This guide clarifies the statutory guidance and options available for streamlining the VMT analysis of infill housing sites for lead agencies that are facing these challenges.

Overview of Approach to Establishing an Infill Housing Screen

Lead agencies are responsible for the evaluation of environmental impacts under CEQA. Many infill housing projects will qualify for categorical exemptions from CEQA and VMT analysis due to recent state legislation described in **Appendix A**. For those that do not qualify, or for when there is uncertainty about whether the infill housing projects do qualify, there are multiple paths for tiering and streamlining infill housing through the General Plan and threshold setting process as presented in the following section, *VMT Streamlining Approaches*. The options include:

- Using CEQA Section 15183 to tier-off a general plan or housing element that has analyzed the VMT impacts
- Establishing local General Plan policies that create a nexus between a jurisdiction's need to produce housing and the value that it places on VMT and GHG reduction
- Establishing a specific VMT threshold or screening criteria related to infill housing.

If considering the last option to establish a specific VMT threshold or screening criteria related to infill housing, the *Substantial Evidence*[4] section below details the following considerations:

1. **Density** – Review zoning designations and account for the VMT reduction effects of increasing residential density on sites with minimum multi-family density zoning (generally 15 dwelling units per acre or higher).
2. **Proximity** – Evaluate whether these zones or sites are proximate to amenities or services, such as those provided in town centers, commercial corridors, or mixed-use zones.
3. **Affordable Housing** – Document the VMT reduction effects of affordable housing to support the presumption of less-than-significant VMT impacts for 100% affordable projects or to account for the VMT reduction benefits provided by required inclusionary affordable housing.
4. **TDM and Parking** – Account for VMT reduction benefits created by TDM programs and parking reductions if they are required per municipal code and there are clear mechanisms for monitoring effectiveness.

Steps 1 and 2 are applicable for most infill housing sites while steps 3 and 4 would provide additional VMT reduction benefits to support findings of a presumption of less-than-significant impacts if they are available. In locations where reliable regional travel model data is unavailable for the site, other data sources such as VMT+, which includes recent VMT estimates based on observed travel conditions using

[4] Per CEQA section 15384, "substantial evidence" refers to the provision of "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." Further, "substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts."

StreetLight Data, can provide additional substantial evidence supporting the local thresholds. [5] Lead agencies should review local conditions and apply discretion at these steps related to the unique characteristics of their communities. Lastly, when developing the approach, involve the City Attorney and other departments involved in development review, including Planning, Public Works, Community Development or Mayor/Executive's Office.

Bay Area Case Studies

Two case studies for Piedmont and Half Moon Bay are presented at the end of this memorandum to demonstrate how these lead agencies defined the characteristics of infill housing projects that lead to the presumption of a less-than-significant VMT impact. These case studies illustrate how lead agencies facing challenges in meeting their Regional Housing Needs Assessment (RHNA) targets due to VMT-related constraints should consider adopting local policies and VMT thresholds and procedures that account for the characteristics of infill housing.

VMT Streamlining Approaches

As part of the implementation of SB 743, OPR's Technical Advisory contains recommendations for the evaluation of transportation impacts. As stated in Cal. Code Regs. tit. 14 § 15064.3: "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact" and that:

> *"Achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development* ***is both generally achievable and is supported by evidence*** *that connects this level of reduction to the State's emissions goals." (emphasis added)* [6]

OPR's Technical Advisory goes on to state that transit-oriented projects, small projects, projects in existing low VMT areas, and affordable housing projects can be presumed to have a less-than-significant impact based on the project's characteristics and thus could be screened out from a VMT analysis. OPR's Technical Advisory also notes that qualitative VMT analysis options can be considered as follows:

> *If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc.*[7]

Given the state's challenges in meeting VMT and GHG reduction goals, as expressed through CARB's 2022 Scoping Plan that notes that VMT per capita will need to be reduced by 25% below 2019 levels by 2030 and 30% below 2019 levels by 2045,[8] lead agencies should use their discretion to select their own VMT thresholds that balance state and local goals and are supported by substantial evidence. Remy Moose Manley, LLP (RMM), a land use and environmental law firm based in Sacramento, provided guidance on establishing thresholds for VMT[9] and noted that, while OPR's Technical Advisory recommends specific thresholds and screening criteria, the statute only generally directs that the threshold "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a

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[5] Free statewide VMT data is available at: Visualizing VMT Per Capita. For more information, see the below "Big Data: VMT+ Case Study".

[6] OPR Technical Advisory on Evaluating Transportation Impacts in CEQA

[7] Section 15064.3 - Determining the Significance of Transportation Impacts

[8] California Air Resources Board 2022 Scoping Plan. Appendix D: Local Actions.

[9] WRCOG SB 743 Implementation Pathway

diversity of land uses."[10] This provides flexibility to set thresholds based on local considerations, such as a lead agency's general plan or housing element.

A lead agency could therefore define the project characteristics for infill housing that could be presumed to have a less-than-significant impact based on substantial evidence. Further, for lead agencies with known limitations to travel demand tools for estimating VMT for infill housing, a qualitative approach based on these characteristics would be consistent with OPR's Technical Advisory. OPR's Technical Advisory cites the court case Covina Residents for Responsible Development v. City of Covina, which includes legal precedent of the environmental benefits of infill development and its overall effect of reducing greenhouse gas emissions.

> *"As one appellate court recently explained: "During the last 10 years, the Legislature has charted a course of long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing greenhouse gas emissions. Section 21099 is part of that strategy . . . ." (Covina Residents for Responsible Development v. City of Covina (2018) 21 Cal.App.5th 712, 729.)"*[11]

Options to Consider if Infill Housing Projects Do Not Qualify for Categorical CEQA Exemptions

As described in the *Infill Definition* section of Appendix A, many infill housing projects will qualify for categorical exemptions from CEQA and VMT analysis due to recent state legislation. To see which housing projects qualify for streamlining and/or exemptions under CEQA, jurisdictions can refer to the OPR Site Check tool[12], which can help identify housing projects that may qualify. For those that don't qualify, or for when there is uncertainty about whether the infill housing projects do qualify, jurisdictions could use the following three options to streamline the VMT analysis for infill housing and thus avoid creating a constraint to implementation of their housing element.

Option 1: General Plan Tiering

Lead agencies that have evaluated the VMT impacts in a general plan or housing element can take advantage of CEQA Guidelines Section 15183:

> *(a) CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.*

This section of the CEQA Guidelines relieves a project of additional environmental review if the environmental impact was adequately addressed in the General Plan EIR, including identification of project-level mitigation, and the project is consistent with the General Plan.

Option 2: Establish a VMT Threshold Based on Local Values

Whether lead agencies decide to use the general plan tiering approach or establish a separate threshold or screening criteria for project-level analysis, they need to establish a VMT threshold for determining the impact. This could include following OPR's Technical Advisory recommendations, such as the reduction of

[10] Pub. Resources Code, § 21099, subd. (b).
[11] OPR Technical Advisory on Evaluating Transportation Impacts in CEQA
[12] Site Check

VMT by 15% for office and residential uses, CARB's target for a 30% reduction, or a threshold based on local values that account for their VMT reduction goals and the need to balance the objectives of SB 743, including GHG reduction, provision of adequate housing, and support for multi-modal transportation networks. When considering use of local goals, lead agencies can consider alignment between their climate action plan (CAP) and the Bay Area Air Quality Management District (BAAQMD). CAPs include growth projections that typically include infill housing sites and actions to allow local jurisdictions to meet their state mandated climate targets which should be consistent with BAAQMD guidance in line with the current CARB Scoping Plan.[13]

Butte County recognized that projects which don't interfere with the state's objectives in achieving VMT and GHG reduction goals could serve as an appropriate benchmark. This benchmark assesses whether development projects align with local CAPs and acknowledges the constraints that individual jurisdictions face in reducing VMT, given the more powerful tools that are available to the state such as VMT taxes, tolls, etc.[14] For any route, lead agencies should establish their own substantial evidence that their VMT threshold is appropriate and consistent with the intent of SB 743 and CEQA Guidelines Section 15064.3.

Option 3: Establish Infill Screening Criteria

When adopting VMT thresholds, screening criteria, or VMT/TIA guidelines, lead agencies could consider a VMT screening criteria for qualifying infill housing projects. For this guide, the minimum density threshold of 15 dwelling units per acre is used when referring to qualifying infill housing although, as noted the following the *Substantial Evidence* section, lead agencies have the authority to determine a locally appropriate definition of infill housing, including the threshold for the proximity to amenities and services and the density levels that would qualify. **Appendix A** presents the statute definition of infill housing.

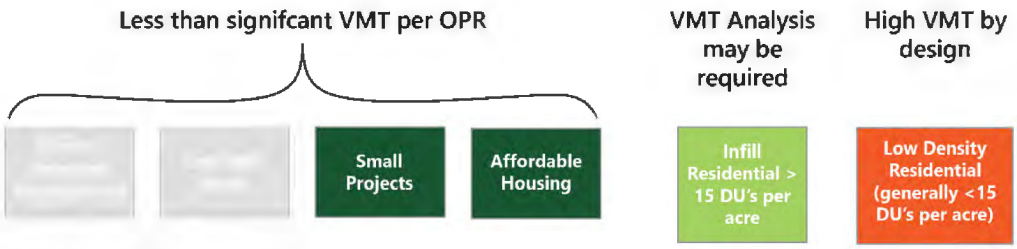
Figure 1 summarizes the current VMT screening options available to suburban and rural jurisdictions where transit services are not available and the model data supporting low VMT areas are limited or unreliable. Establishing a VMT screening criteria for infill housing would be consistent with OPR's guidance to use alternate approaches when use of a calibrated travel demand model is unavailable. This would streamline how lead agencies approach VMT analysis and clarify the types of housing development that align a city's housing production goals with state climate goals. While this approach could relieve the need of conducting VMT analysis for these projects, lead agencies will need to determine whether VMT or traffic data is required for air quality, noise, and GHG analysis.

[13] Table 3-2, item A.2 of Bay Area Air Quality Management District's 2022 CEQA Guidelines: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-3-thresholds_final_v2-pdf.pdf?la=en

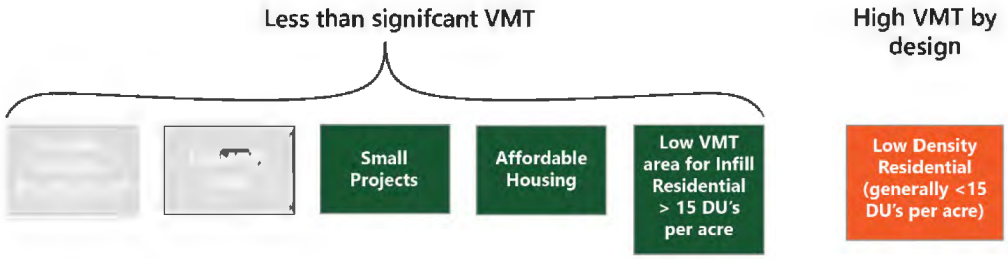
[14] http://www.bcag.org/Planning/SB-743-Implementation-Study/index.html

Figure 1: VMT Screening Options for Suburban and Rural Jurisdictions

Existing Screening Options without TOD and Inadequate Low VMT Areas



Potential Future Screening Options



Substantial Evidence

As noted above, lead agencies could set a local VMT threshold or screening criteria that balances multiple local and state objectives related to GHG reduction, adequate housing, and support for multimodal transportation networks. Substantial evidence means that "a fair argument can be made to support a conclusion" based on substantial evidence and reasonable inferences.[15] The substantial evidence presented below demonstrates that infill developments located outside of high-quality transit areas or existing low VMT areas could be presumed to have a less-than-significant impact if they meet minimum densities and are proximate to amenities and services and/or provide affordable housing.

Density

One of the more effective strategies to reduce the VMT generated by residential developments is increasing the residential density (Strategy T-1 in the CAPCOA 2021 Handbook[16]). Increasing residential density results in shorter and fewer trips by single-occupancy vehicles and thus results in VMT reductions. According to the CAPCOA Handbook, 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%.[17] The CAPCOA

[15] Cal. Code Regs. Tit. 14, § 15384

[16] California Air Pollution Control Officers Association (CAPCOA) 2021 *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*

[17] As noted in the CAPCOA Handbook, this elasticity is appropriate for residential uses that are greater than the average residential density in the U.S. of 9.1 dus/acre.

Handbook also sets a maximum VMT reduction of 30% from baseline conditions for this strategy.[18] As shown in **Table 1**, multi-family infill developments that are denser than the existing neighborhood would be expected to generate less VMT than that of the surrounding neighborhood.

Table 1: VMT Reductions Associated with Density

Density (Dwelling units per acre)	VMT Reduction Compared to Average U.S. Density
9.1[1]	0%
10	-2.2%
15[2]	-14.3%
20[3]	-26.4%
25	-30%

Notes:

1. Average residential density in the U.S., which should serve as the default for calculations unless the density of the surrounding neighborhood is higher than 9.1 dwelling units per acre. These reduction values should only be applied when the density of the project is greater than that of the surrounding neighborhood.
2. This density level aligns with recent state laws, as noted in the infill definition section in Appendix A.
3. As noted in CARB 2022 Scoping Plan Appendix D Local Actions, CARB recommends this minimum density for infill housing that could be presumed to be consistent with state climate goals among other factors

Source: CAPCOA 2021 Handbook, Fehr & Peers. 2023

Lead agencies can determine the density of future development through their general plan and zoning code based on local goals and values. Lead agencies can account for the density of future developments that are consistent with the zoning code in establishing local VMT thresholds or screening criteria. While increased density at infill locations can reduce VMT, jurisdictions will also want to consider a site's proximity to amenities and services, as described below.

Proximity to Amenities and Services

As noted in state law (PRC §65913(6)(E)) and presented in Appendix A, the proximity of housing to amenities and services is an important consideration for determining the potential for a project to create a significant impact on the environment. The amenities and services in this statute include supermarkets or grocery stores, public parks, community centers, pharmacy or drugstores, medical clinics or hospitals, public libraries, and schools that maintain a kindergarten or any of grades 1 to 12. This statute notes that an infill site should have at least six of these amenities within one mile, or two miles for rural context, to be categorically exempt. The one- to two-mile radius reflects the fact that households within suburban and rural jurisdictions are often located in single-use environments with few nearby amenities; thus, people living within these radii would have shorter drive trips and more opportunities to walk, bike, or take transit than a traditional single-use suburban environment.

Evidence supporting this statute is found in the Environmental Protection Agency's (EPA's) MXD methodology[19], which estimates the amount of vehicle trips generated based on a project's geographic setting, mix of project site and nearby land uses, neighborhood demographics, design of the pedestrian and bicycling environment, and proximity to regional transit. The MXD methodology indicates that traditional low density suburban style development patterns typically generate 35% more vehicle trips than development in mixed-use context. This is consistent with the Institute of Transportation Engineers

[18] CAPCOA Handbook for Analyzing Greenhouse Gas Emission Reduction, Assessing Climate Vulnerabilities, and Advancing Health and Equity Strategy T-1. Increase Residential Density

[19] For more information on the MXD methodology please visit https://www.fehrandpeers.com/mainstreet/ or see *Getting Trip Generation Right Eliminating the Bias Against Mixed Use Development* by the American Planning Association, May 2013.

(ITE) Trip Generation Handbook (3rd Edition) which recommends against using data from low density suburban land uses for "development and redevelopment in compact, urbanized areas where walking, bicycling, and transit are viable modes of transportation."[20]

Jurisdictions could consider this evidence when establishing a VMT threshold or screening criteria by determining which infill sites are proximate to amenities. Many suburban and rural jurisdictions identify town centers, commercial corridors, or other mixed-use districts that, by definition, meet the statute due to the mix of amenities and, therefore, could use those areas to determine which infill sites could be presumed to be less than significant. While this statute uses a one-mile buffer for suburban jurisdictions and a two-mile buffer for rural areas, jurisdictions should consider whether these buffers are appropriate or whether additional factors, such as the connectivity of walking, bicycling, and transit networks to these amenities, could be considered as substantial evidence that housing sites would reduce the number and length of driving trips. This research offers jurisdictions a basis to justify the expansion of an infill parcel that falls within an infill VMT threshold or screening criteria. This expansion could go beyond the requirement of "75% of the perimeter of the site adjoins parcels that are developed with qualified urban uses." This can be done by demonstrating which parcels are well connected and within a convenient walking distance to the amenities and services, such as through a complete pedestrian network (e.g., ADA-compliant sidewalks and crossings), thus demonstrating that they would function similar to an infill site from a VMT perspective.

Affordable Housing

Jurisdictions are required through the RHNA process to facilitate the construction of affordable housing and many jurisdictions or state laws require a minimum percentage of housing units be set aside for affordable housing. With the passage of California Assembly Bill 1449 in October 2023, certain affordable housing projects will be exempt from CEQA. For the purposes of this bill, affordable housing must dedicate 100% of units to lower income households and meet criteria related to the project's location for infill locations as defined above.[21] OPR's Technical Advisory states that "adding affordable housing to infill locations generally improves jobs-housing match, in turn shortening commutes and reducing VMT,"[22] citing research done to investigate job-housing fit and commute distance by Karner and Berner.[23] OPR also states that:

> *"A project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less-than-significant impact on VMT. Evidence supports a presumption of less-than-significant impact for a 100% affordable residential development (or the residential component of a mixed-use development) in infill locations. Lead agencies may develop their own presumption of less-than-significant impact for residential projects (or residential portions of mixed-use projects) containing a particular amount of affordable housing, based on local circumstances and evidence. Furthermore, a project which includes any affordable residential units may factor the effect of the affordability on VMT into the assessment of VMT generated by those units."* [24]

Caltrans SB 743 Program Mitigation Playbook describes mitigation methods for VMT induced by highway capacity projects but acknowledges that the primary method for reducing VMT is not mitigation but

[20] Institute of Transportation Engineers *Trip Generation Handbook*, *3rd Edition* (2017), page 8.
[21] California Assembly Bill 1449
[22] OPR Technical Advisory on Evaluating Transportation Impacts in CEQA
[23] Karner and Benner (2016) The convergence of social equity and environmental sustainability: Jobs-housing fit and commute distance.
[24] OPR Technical Advisory on Evaluating Transportation Impacts in CEQA

developing projects that do not increase VMT in the first place. In relation to land use, the Playbook states:

> *"Affordable housing produces less VMT compared to market-rate housing. To the extent a project contributes to such housing, it can take credit for the VMT reduction compared to business as usual. Compared to other options, denser, more affordable housing is a powerful VMT-reduction tool."*[25]

The CAPCOA 2021 Handbook includes a strategy (T-4) titled "Integrate Affordable and Below Market Rate Housing." CAPCOA defines the implementation requirements of Strategy T-4 as:

> *"Multifamily residential units must be permanently dedicated as affordable for lower income families. The California Department of Housing and Community Development (2021) defines lower income as 80% of area median income or below, and affordable housing as costing 30% of gross household income or less."* [26]

Table 2 presents VMT reduction associated with qualifying affordable housing projects when compared to market rate units. When affordable housing is required by a jurisdiction, they could consider accounting for VMT reduction benefits provided by the required affordable housing in the VMT thresholds or screening criteria.

Table 2: VMT Reductions Associated with Affordability

Required Percentage of Affordable Housing[1]	VMT Reduction Compared to 100% Market Rate[2]
10%	-2.86%
15%	-4.29%
20%	-5.72%
50%	-14.3%
100%	-28.6%

Notes:

1. Typical levels of affordable housing required for state law compliance or local inclusionary as case studies.
2. The Caltrans Mitigation Playbook uses a 1,000 unit development example to showcase potential VMT reduction of affordable housing. If the 1,000 unit development proposed 100% affordable housing on U.S. average residential density of 9.1 units/acre, it could assume an annual VMT reduction of 5,618 per household based on the 28.6 percent reduction from the typical 19,641.8 per year. Based on this household reduction, 1,000 units could claim a reduction of 5,617,555 VMT per year.

Source: CAPCOA 2021 Handbook, Fehr & Peers. 2023

TDM and Parking

The CAPCOA 2021 Handbook presents the transportation-related categories that are effective at reducing GHG emissions that may be required for new land uses and could be accounted to substantiate local VMT thresholds and screening criteria. These quantifiable measures offer a comprehensive framework that covers various aspects of TDM, from reducing single-occupancy vehicle trips to promoting alternative transportation options. Municipalities can utilize CAPCOA's measures to structure TDM ordinances that suit their unique needs and local conditions, ensuring that the ordinances are aligned with statewide air quality and sustainability goals. By incorporating strategies outlined by CAPCOA 2021 Handbook, municipalities can design comprehensive VMT thresholds and screening criteria that prioritize the

[25] Caltrans SB 743 Program Mitigation Playbook.

[26] CAPCOA Handbook for Analyzing Greenhouse Gas Emission Reduction, Assessing Climate Vulnerabilities, and Advancing Health and Equity Strategy T-4. Integrate Affordable and Below Market Rate Housing

implementation of physical measures, such as complete streets designs (e.g., frontage improvements to prioritize people walking, bicycling, and riding transit), and programmatic measures through TDM ordinances.

Although reduced parking can lessen the convenience of driving, incentivize a shift to other modes, and reduce overall VMT, VMT-mitigating parking strategies often pose large challenges, particularly in suburban and rural areas. The CAPCOA 2021 Handbook includes the strategy (T-14) titled "Limit Residential Parking Supply." Reduced off-street parking for new developments can result in spillover parking on side streets and private lots, causing inconvenience and concerns from existing neighbors. Another strategy identified by CAPCOA is T-15 titled "Unbundle Residential Parking Costs from Property Cost." This strategy ensures that the price of parking is passed through to the vehicle owner using the parking space, which may act to disincentivize vehicle ownership. California Assembly Bill 1317, passed in October 2023, "require[s] the owner of qualifying residential property, as defined, that provides parking with the qualifying residential property to unbundle parking from the price of rent."[27] The bill will come into effect January 1, 2025, and applies to residential properties with 16 or more dwelling units within the counties of Alameda, Fresno, Los Angeles, Riverside, Sacramento, San Bernadino, San Joaquin, Santa Clara, Shasta, or Ventura. When these parking measures are required by a jurisdiction, and there are established management strategies (e.g., residential parking permits) to account for spillover parking, these required parking reductions could be considered when establishing a local VMT threshold or screening criteria.

For additional information on the application of VMT reductions associated with TDM or parking measures, review the CAPCOA 2021 Handbook at https://www.caleemod.com/handbook/full_handbook.html or use the TDM+ provided by Caltrans for free at https://dot.ca.gov/programs/esta/sb-743/resources.

Steps on establishing a TDM Ordinance can be found on the MTC/ABAG Technical Assistance Portal at https://abag.ca.gov/technical-assistance/parking-transportation-demand-management-policy.

Big Data: VMT+ Case Study

Understanding the amount of VMT generated by a community provides insights into the efficiency of existing land use patterns, but frequently suburban and rural jurisdictions face challenges in calibrating local and regional travel demand models used to traditionally create VMT estimates. All models have limitations and regional travel models may not represent current conditions, complete trip lengths, or unique land uses. They can also be time-consuming to operate. To address these limitations and enhance the reliability of VMT data, VMT+ emerges as a valuable alternative data source. VMT+ offers recent VMT estimates based on observed travel conditions from March through May of 2019 using StreetLight Data.[28] VMT+ provides VMT per capita estimates at the specific level of Census Block Groups, enabling a detailed exploration of trip generation rates in specific areas. For jurisdictions looking for big data VMT solutions, an alternate source includes Replica.[29]

Case Studies

The following case studies demonstrate how two lead agencies are aligning their VMT thresholds with their housing element by identifying the project characteristics that could be presumed to be less than significant.

[27] California Assembly Bill 1317
[28] Find Your VMT With VMT+
[29] https://www.replicahq.com/

Piedmont

Piedmont's Housing Element Draft EIR[30] considered the effect of the density at infill housing sites in determining which sites would have the potential to create a significant impact. This approach leveraged the opportunities presented by CEQA Guidelines Section 15183 and the substantial evidence presented above for the density of future projects to establish a new screening criterion for future infill housing consistent with the housing element.

This Draft EIR included using VMT data from the Alameda CTC Model, which includes 6 TAZs in the city of Piedmont. Based on the results of the Alameda CTC Model, and applying the CAPCOA Handbook's increasing residential densities strategy, residential developments with a density of 20 units per acre or higher in 5 of the 6 TAZs in the city of Piedmont would have a home-based VMT per resident below the threshold of significance (i.e., 15% below the Bay Area Regional Baseline Average). Therefore, these developments would have a less-than-significant impact on VMT.

Figure 2 from the Housing Element Draft EIR) shows the areas of the city where future housing developments with a minimum density of 20 units per acre would have a less-than-significant impact on VMT. As shown in **Figure 2**, future developments in the southeast area of the city would not meet this criterion because the baseline VMT in this area is more than 30% above the threshold of significance and increasing the development density would not reduce VMT to a less-than-significant level.

[30] https://www.piedmontishome.org/housing-element-update

Figure 2: Areas Eligible for Infill Screening



Source:
Fehr & Peers, 2023

Half Moon Bay

Half Moon Bay does not have adequate model information available to develop low-VMT areas because the city is split into three zones in the countywide C/CAG Travel Demand Model, each of which generate approximately the same level of VMT. Half Moon Bay is adopting VMT thresholds that align with OPR's recommendations to reduce VMT by 15% for residential uses compared to the citywide average. Half Moon Bay has, therefore, decided to establish an Infill screening criterion that identified urbanized parcels (per the Census definition noted in Appendix A) that are within convenient walking distance (one-half mile) of the designated Town Center that would result in a 15% reduction or greater (as shown in **Figure 3**). The substantial evidence supporting this approach includes the following:

- The minimum density of these pipeline projects and housing element sites (at least 20 dwelling units per acre) are greater than the existing neighborhood densities.
- The proximity of these sites are within walking distance to the amenities and services provided by Half Moon Bay's Town Center.
- The fact that sites that currently don't qualify as urbanized parcels per the Census definition noted above will qualify with the addition of the pipeline projects or housing element opportunity sites.

Parcels that meet these criteria can be presumed to have a less-than-significant impact on the environment given the VMT reduction potential for projects with these characteristics. Parcels that qualify as urbanized areas but are not within convenient walking distance of the Town Center could not be presumed to have a less-than-significant impact and would require a VMT analysis to demonstrate that

the project would provide the density, proximity to amenities and services required, and if needed, affordable housing or TDM measures to reduce VMT to a less-than-significant level.

As an additional level of substantial evidence supporting the City's screening criteria is the VMT presented in VMT+ shown in **Figure 4**. This indicates that, with the existing residential densities, the areas within or adjacent to the Town Center generate less VMT than the citywide average (Town Center is 11% below and other green areas are 5% below). Therefore, the VMT reduction generated by multi-family densities (over 25% reduction as indicated in Table 1) would result in a less-than-significant impact using this data source.

Figure 3: Residential Infill Screening Map for Half Moon Bay

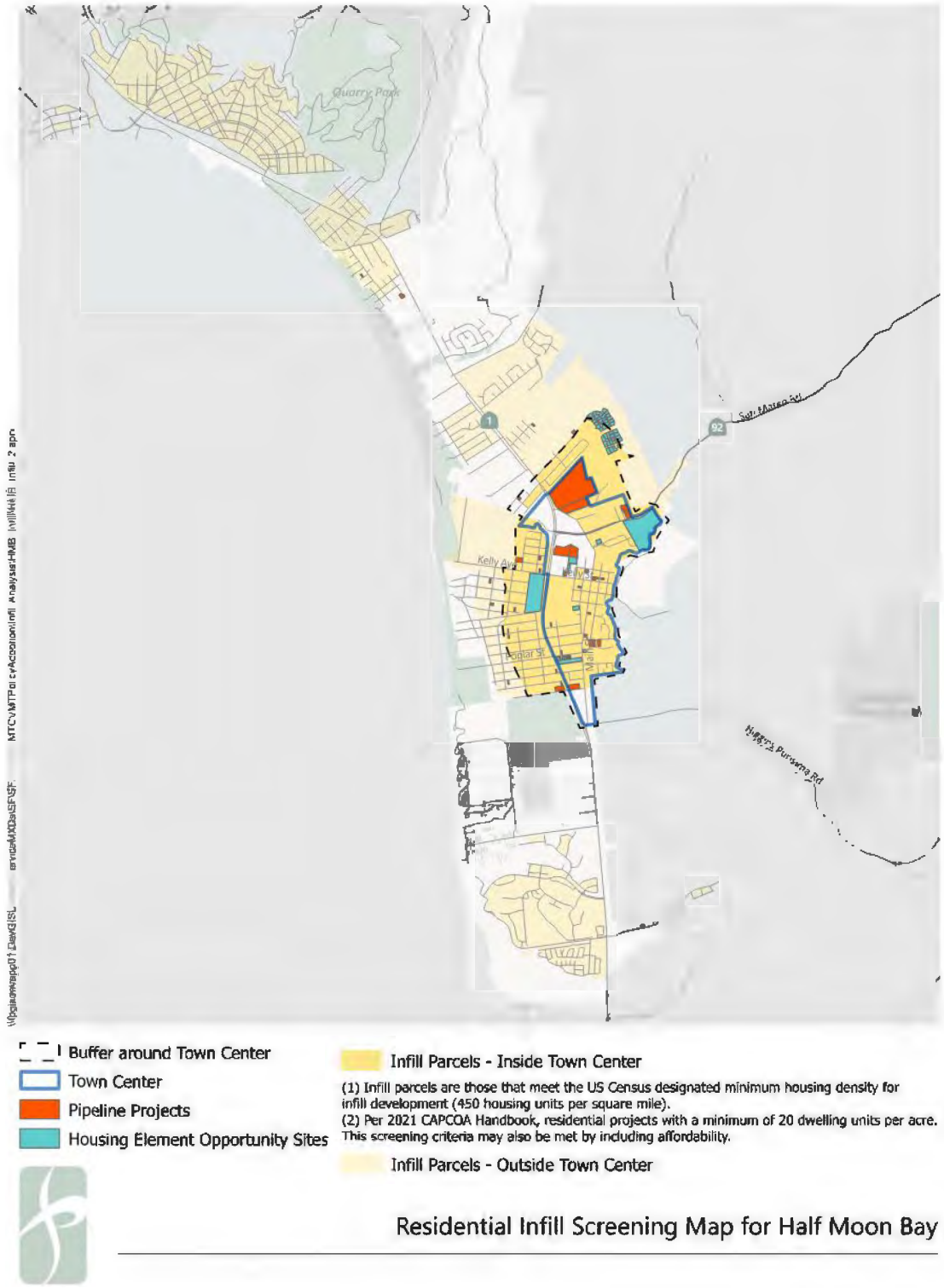
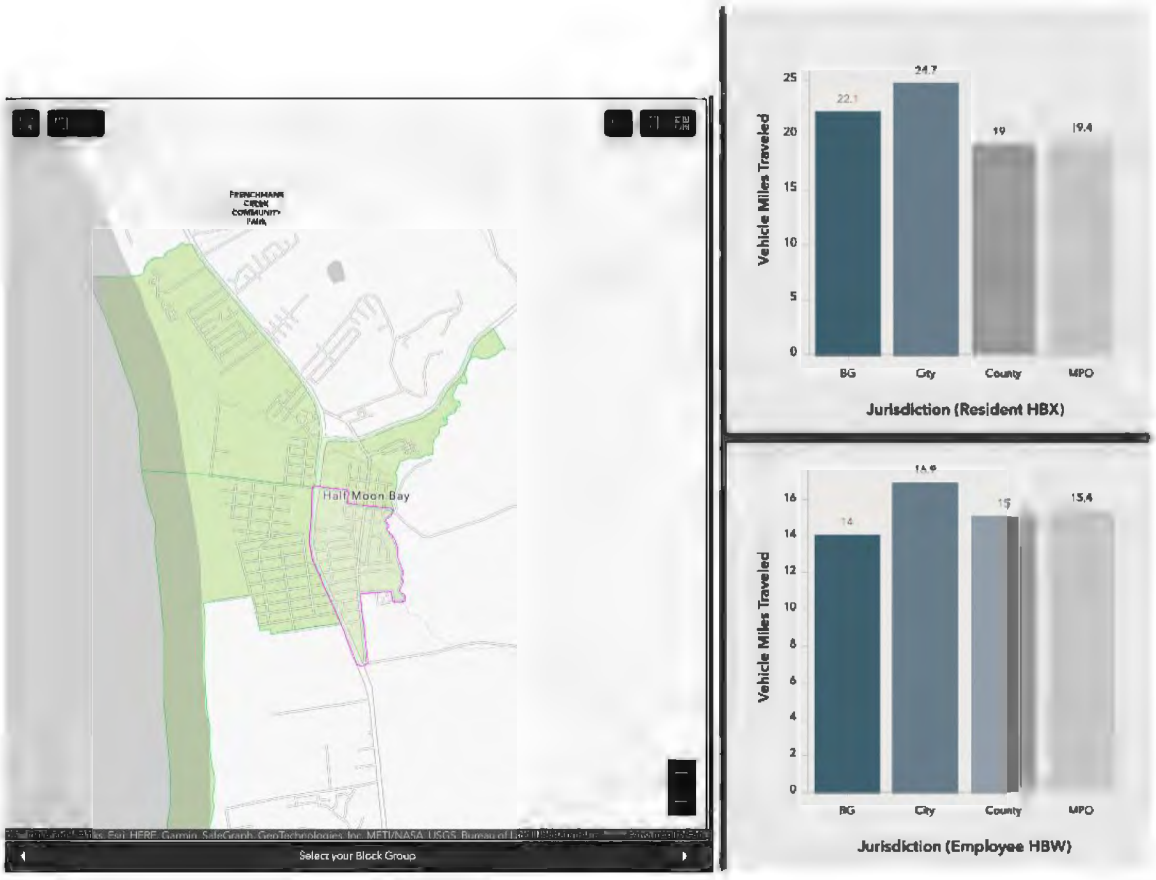


Figure 4: VMT+ Data for Half Moon Bay



Source: Find Your VMT With VMT+

Appendix A: Legislative and Regulatory context

Public Resource Code 210001 underscores the role that housing serves as an overarching guiding criterion in public decisions within California (underline added for emphasis):

"Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions."

The California Department of Housing and Community Development (HCD) requires the removal of constraints to the maintenance, improvement, and development of housing, as stated in Government Code Section 65583(c)(3):

"Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities."[31]

The California Air Resource Board (CARB) 2022 Scoping Plan infill housing emerges as a critical component of achieving the state's climate goals, such as those in SB 375, the Sustainable Communities and Climate Protection Act[32], as stated in Appendix D "Local Actions":

"As discussed in Section 3.2.1, "Project Attributes for Residential Projects to Qualitatively Determine Consistency with the Scoping Plan," development in infill and transit-oriented areas helps to reduce or avoid increasing GHG emissions."[33]

CARB's 2022 Scoping Plan goes on to describe how, by utilizing previously developed or underutilized urban spaces, infill housing minimizes urban sprawl, reduces the need for new infrastructure, preserves open spaces, and limits the ecological footprint of development. Infill housing promotes more sustainable transportation patterns by placing residents closer to existing amenities and services or transit options, thereby requiring shorter vehicle trips and encouraging walking, bicycling, and public transport to meet one's daily needs. Affordable housing ensures that a more diverse range of individuals can access housing close to job centers, amenities, and services, further promoting sustainable transportation choices. CARB's 2022 Scoping Plan acknowledges that lengthy review and approval processes have historically been a leading constraint to housing production in California, recommending that local governments adopt processes to encourage and expedite housing projects, particularly for infill opportunities:

"O'Neill et al. (2022) found that restrictive local zoning and development approval processes are the chief regulatory contributors to California's housing crisis. Local governments have a clear opportunity to eliminate these barriers by reforming their local laws to facilitate dense development in infill areas, particularly those in high resource and/or low-VMT communities. Local jurisdictions can also choose to adopt ministerial entitlement processes for housing instead of imposing discretionary review processes (some jurisdictions currently even impose multiple layers of discretionary review) that provide project opponents opportunities to slow or stop projects, sometimes without advancing legitimate environmental goals."[34]

[31] California Government Code Section 65583(c)(3)
[32] Sustainable Communities & Climate Protection Program
[33] California Air Resources Board 2022 Scoping Plan. Appendix D: Local Actions.
[34] California Air Resources Board 2022 Scoping Plan. Appendix D: Local Actions.

SB 743 and subsequent updates to the CEQA Guidelines Section 15064.3 eliminated automobile delay and established alternate criteria for evaluating transportation impacts under CEQA. SB 743 includes the following two legislative intent statements (underline added for emphasis):

1. *Ensure that the environmental impacts of traffic, such as noise, air pollution, and safety concerns continue to be properly addressed and mitigated through the California Environmental Quality Act.*
2. *More appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of GHG emissions.*

As part of the implementation of SB 743, OPR's Technical Advisory contains recommendations for the evaluation of transportation impacts through the use of VMT, as described in the *VMT Streamlining Approaches* section of this memorandum. In general, the replacement of LOS with VMT streamlined the environmental review for infill housing because it generates less VMT than traditional suburban sprawl patterns of development and because infill housing often occurs within areas that are well served by transit or that are low VMT areas. However, many suburban and rural communities have limited high-quality transit service and low-VMT communities and the available regional travel models are calibrated to existing low density suburban land use patterns and are too complex or costly for many communities to update them to reflect the characteristics of new infill multi-family housing. The limited availability of reliable technical tools can create uncertainty about when new infill housing in these communities could result in a significant impact to the environment. Therefore, lead agencies facing challenges in meeting their Regional Housing Needs Assessment (RHNA) targets due to VMT-related constraints should consider adopting local policies and VMT thresholds and procedures that account for the characteristics of infill housing.

Infill Definition

Given that the SB 743 statute describes infill development as one of the goals, it is important to define this concept. OPR defines infill as "…building within unused and underutilized lands within existing development patterns, typically but not exclusively within urban areas."[35] A definition for Infill is also codified in California's Public Resources Code (PRC) §21061.3:

"Infill site" means a site in an urbanized area that meets either of the following criteria:

(a) The site has not been previously developed for urban uses and both of the following apply:
    (1) The site is immediately adjacent to parcels that are developed with qualified urban uses, or at least 75 percent of the perimeter of the site adjoins parcels that are developed with qualified urban uses, and the remaining 25 percent of the site adjoins parcels that have previously been developed for qualified urban uses.
    (2) No parcel within the site has been created within the past 10 years unless the parcel was created as a result of the plan of a redevelopment agency.
(b) The site has been previously developed for qualified urban uses.[36]

[35] OPR Infill Development Definition
[36] PRC §21061.3

Both definitions refer to development of unused land or redevelopment of land within urban areas. In addition, "urban areas" as referenced by OPR are referring to the US Census Bureau's definition of infill. Following the 2020 Census, the following documentation is provided on the definition of urban:

> *The Census Bureau proposes to begin the delineation process by identifying and aggregating contiguous census blocks each having a housing unit density of at least 425 housing units per square mile. This aggregation of continuous census blocks would be known as the "initial urban area core." The initial urban area core must encompass at least 425 housing units (consistent with the requirement for at least 1,000 people in the 2010 criteria).*[37]

Other recent state laws, such as SB 226 and AB 1633,[38] have clarified that infill housing (as defined by the above) with at least 15 dwelling units per acre is categorically exempt from CEQA and, therefore, an evaluation of VMT would not be required if it is not in a very high fire hazard severity zone and located in one of the following areas:

1. One-half mile walking distance to a high-quality transit corridor,[39] a major transit stop,[40] or a bus station or ferry terminal.
2. Low vehicle travel area (15% below regional or citywide VMT).
3. In close proximity to amenities and services of six or more of the following: a supermarket or grocery store, a public park, a community center, a pharmacy or drugstore, a medical clinic or hospital, a public library, or a school that maintains a kindergarten or any of grades 1 to 12, inclusive.[41]

OPR recommends that areas 1 and 2 can be presumed to have a less-than-significant impact due to VMT, while area 3 is typical of infill locations in suburban and rural environments that could be presumed to have a less-than-significant impact based on substantial evidence. Essentially, area 3 identifies the characteristics of a low VMT area for new infill housing that meets the minimum state law density requirements that may not be accurately reflected within the existing baseline of regional travel demand models.

[37] Redefining Urban Areas following the 2020 Census

[38] https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB1633

[39] "High-quality transit corridor" has the same meaning defined in subdivision (b) of Section 21155 of the Public Resources Code.

[40] "Major transit stop" has the same meaning as defined in Section 21064.3 of the Public Resources Code.

[41] The housing development project is proximal to six or more amenities pursuant to subclause (IV) of clause (vii) of PRC §65913(6)(E) as of the date of submission of the application for the project. Proximal is defined by being within one mile, or for a parcel in a rural area, within two miles of a project site.

Appendix D: Regional Transportation Plan/Sustainable Community Strategy Plan Consistency

Table D-1: Plan Bay Area 2050 Consistency Evaluation

		Consistency Evaluation	Consistency Evaluation	Consistency Evaluation	
	Plan Bay Area 2050 Strategy	Supports	Obstructs	Does not Obstruct	Explanation
	Housing Strategies				
H1	**Further strengthen renter protections beyond state law.** Building upon recent tenant protection laws, limit annual rent increases to the rate of inflation, while exempting units less than 10 years old.			X	Project policies do not affect renter protections.
H2	**Preserve existing affordable housing.** Acquire homes currently affordable to low and middle-income residents for preservation as permanently deed-restricted affordable housing.	X			The Project could support preserving affordable housing if paired with other policy commitments, as the project stands, the city has not yet adapted policies to accomplish this, but it does not obstruct if paired with SB-330 style policy implementation
H3	**Allow a greater mix of housing densities and types in Growth Geographies.** Allow a variety of housing types at a range of densities to be built in Priority Development Areas, select Transit-Rich Areas, and select High-Resource Areas.	X			The Project will add a variety of housing types and increased density to more than half of the city's housing supply through the update of the R3 Zoning Code.

		Consistency Evaluation	Consistency Evaluation	Consistency Evaluation	
	Plan Bay Area 2050 Strategy	Supports	Obstructs	Does not Obstruct	Explanation
H4	**Build adequate affordable housing to ensure homes for all.** Construct enough deed restricted affordable homes to fill the existing gap in housing for the unhoused community and to meet the needs of low-income households.	X			The purpose of the Project is to build adequate affordable housing and address the housing deficit within the city. The project could support this objective even further if supported by previously mentioned affordable housing protection policies
H5	**Integrate affordable housing into all major housing projects.** Require a baseline of 10-20% of new market-rate housing developments of five units or more to be affordable to low-income households.			X	The Project will not affect this policy.
H6	**Transform aging malls and office parks into neighborhoods.** Permit and promote the reuse of shopping malls and office parks with limited commercial viability as neighborhoods with housing for residents at all income levels.			X	The Project will not affect this policy,
H7	**Provide targeted mortgage, rental and small business assistance to Equity Priority Communities.** Provide assistance to low-income communities and communities of color to address the legacy of exclusion and predatory lending, while helping to grow locally owned businesses.			X	The Project will not affect this policy,

		Consistency Evaluation	Consistency Evaluation	Consistency Evaluation	
	Plan Bay Area 2050 Strategy	Supports	Obstructs	Does not Obstruct	Explanation
H8	**Accelerate reuse of public and community-owned land for mixed-income housing and essential services.** Help public agencies, community land trusts and other non-profit landowners accelerate the development of mixed-income affordable housing.			X	The Project will not affect this policy.
	Economic Strategies				
EC1	**Implement a statewide universal basic income.** Provide an average $500 per month payment to all Bay Area households to improve family stability, promote economic mobility and increase consumer spending.			X	The Project will not affect this policy.
EC2	**Expand job training and incubator programs.** Fund assistance programs for establishing new businesses, as well as job training programs, primarily in historically disinvested communities.			X	The Project will not affect this policy,
EC3	**Invest in high-speed internet in underserved low-income communities.** Provide direct subsidies and construct public infrastructure to ensure all communities have affordable access to high-speed internet.			X	The Project does not affect this policy.
EC4	**Allow greater commercial densities in Growth Geographies.** Allow greater densities for new commercial development in select Priority Development Areas and Transit-Rich Areas to encourage more jobs to locate near public transit.			X	The Project will not affect this policy.

		Consistency Evaluation	Consistency Evaluation	Consistency Evaluation	
	Plan Bay Area 2050 Strategy	Supports	Obstructs	Does not Obstruct	Explanation
EC5	**Provide incentives to employers to shift jobs to housing-rich areas well served by transit.** Provide subsidies to encourage employers to relocate offices to housing-rich areas near regional rail stations.			X	The Project will not affect this policy,
EC6	**Retain and invest in key industrial lands.** Implement local land use policies to protect key industrial lands, identified as Priority Production Areas, while funding key infrastructure improvements in these areas.			X	The Project will not affect this policy.
EN7	**Expand commute trip reduction programs at major employers.** Set a sustainable commute target for major employers as part of an expanded Bay Area Commuter Benefits Program, with employers responsible for funding incentives and disincentives to shift auto commuters to any combination of telecommuting, transit, walking and/or bicycling.			X	The Project will not affect this policy.
EN8	**Expand clean vehicle initiatives.** Expand investments in clean vehicles, including more fuel-efficient vehicles and electric vehicle subsidies and chargers.			X	The Project will not affect this policy.
EN9	**Expand transportation demand management initiatives.** Expand investments in programs like vanpools, bikeshare, carshare and parking fees to discourage solo driving.			X	The Project will not affect this policy.
	Transportation Strategies				

		Consistency Evaluation	Consistency Evaluation	Consistency Evaluation	
	Plan Bay Area 2050 Strategy	Supports	Obstructs	Does not Obstruct	Explanation
T1	**Restore, operate, and maintain the existing system**. Commit to operate and maintain the Bay Area's roads and transit infrastructure while overseeing pandemic-related cuts to total transit service hours.			X	The Project will not significantly affect the existing system.
T2	**Support community-led transportation enhancements in Equity Priority Communities.** Provide direct funding to historically marginalized communities for locally identified transportation needs.			X	The Project will not affect this policy.
T3	**Enable a seamless mobility experience.** Eliminate barriers to multi-operator transit trips by streamlining fare payment and trip planning while requiring schedule coordination at timed transfer hubs.			X	The Project will increase density in some residential neighborhoods, which should increase transit ridership and make it easier for VTA to operate effective service.
T4	**Reform regional transit fare policy.** Streamline fare payment and replace existing operator specific discounted fare programs with an integrated fare structure across all transit operators.			X	The Project will not affect this policy.
T5	**Implement per-mile tolling on congested freeways with transit alternatives.** Apply a per-mile charge on auto travel on select congested freeway corridors where transit alternatives exist, with discounts for carpoolers, low-income residents, and off-peak travel; and reinvest excess revenues into transit alternatives in the corridor.			X	The Project will not affect this policy.

		Consistency Evaluation	Consistency Evaluation	Consistency Evaluation	
	Plan Bay Area 2050 Strategy	Supports	Obstructs	Does not Obstruct	Explanation
T6	**Improve interchanges and address highway bottlenecks**. Rebuild interchanges and widen key highway bottlenecks to achieve short- to medium-term congestion relief.			X	The Project will not affect this policy.
T7	**Advance other regional programs and local priorities.** Fund regional programs like motorist aid and 511 while supporting local transportation investments on arterials and local streets.			X	The Project will not affect this policy.
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.			X	While not directly required, The Project will increase density in some residential neighborhoods, which should promote active transportation usage such as walking, biking, and other-micro mobility modes. New development will be required to follow existing city regulations and guidelines.
T9	**Advance regional Vision Zero policy through street design and reduced speeds.** Reduce speed limits to between 20 and 35 miles per hour on local streets and 55 miles per hour on freeways, relying on design elements on local streets and automated speed enforcement on freeways.			X	The Project will not affect this policy, and new developments will be required to meet the existing guidelines of the City's Vision Zero Policy.

		Consistency Evaluation	Consistency Evaluation	Consistency Evaluation	
	Plan Bay Area 2050 Strategy	Supports	Obstructs	Does not Obstruct	Explanation
T10	**Enhance** local transit frequency, capacity and reliability**.** Improve the quality and availability of local bus and light rail service, with new bus rapid transit lines, South Bay light rail extensions, and frequency increases focused in lower-income communities.			X	The Project will not affect this policy.
T11	**Expand and modernize the** regional rail network**.** Better connect communities while increasing frequencies by advancing the Link21 new transbay rail crossing, BART to Silicon Valley Phase 2, Valley Link, Caltrain Downtown Rail Extension and Caltrain/High-Speed Rail grade separations, among other projects.			X	The Project will not affect this policy.
T12	**Build an integrated** regional express lanes and express bus network**.** Complete the buildout of the regional express lanes network to provide uncongested freeway lanes for new and improved express bus services, carpools, and toll-paying solo drivers.			X	The Project will not affect this policy.
	Environmental Strategies				
EN1	**Adapt to sea level rise.** Protect shoreline communities affected by sea level rise, prioritizing low-cost, high-benefit solutions, and providing additional support to vulnerable populations.			X	The Project does not affect this policy.

		Consistency Evaluation	Consistency Evaluation	Consistency Evaluation	
	Plan Bay Area 2050 Strategy	Supports	Obstructs	Does not Obstruct	Explanation
EN2	**Provide means-based financial support to retrofit existing residential buildings.** Adopt building ordinances and incentivize retrofits to existing buildings to meet higher seismic, wildfire, water, and energy standards, providing means-based subsidies to offset associated costs.			X	The Project will not affect this policy.
EN3	**Fund energy upgrades to enable carbon neutrality in all existing commercial and public buildings.** Support electrification and resilient power system upgrades in all public and commercial buildings.			X	The Project will not affect this policy.
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.	X			The Project focuses growth within the Project area.
EN5	**Protect and manage high-value conservation lands.** Provide strategic matching funds to help conserve and maintain high-priority natural and agricultural lands, including but not limited to, Priority Conservation Areas and wildland-urban interface areas.			X	The Project will not affect high-value conservation lands.
EN6	**Modernize and expand parks, trails, and recreation facilities.** Invest in quality parks, trails and open spaces that provide inclusive recreation opportunities for people of all backgrounds, abilities, and ages to enjoy.			X	The Project will not affect this policy.

		Consistency Evaluation	Consistency Evaluation	Consistency Evaluation	
	Plan Bay Area 2050 Strategy	Supports	Obstructs	Does not Obstruct	Explanation
EN7	**Expand commute trip reduction programs at major employers.** Set a sustainable commute target for major employers as part of an expanded Bay Area Commuter Benefits Program, with employers responsible for funding incentives and disincentives to shift auto commuters to any combination of telecommuting, transit, walking and/or bicycling.			X	The Project will not affect this policy.
EN8	**Expand clean vehicle initiatives.** Expand investments in clean vehicles, including more fuel-efficient vehicles and electric vehicle subsidies and chargers.			X	The Project will not affect this policy.
EN9	**Expand transportation demand management initiatives.** Expand investments in programs like vanpools, bikeshare, carshare and parking fees to discourage solo driving.			X	The Project will not affect this policy.

Source: MTC Plan Bay Area 2050 Consistency Checklist, 2024; Fehr & Peers, 2025.

Appendix D

Special-Status Species Potential to Occur

Special-Status Plant Species in the Regional Vicinity of the Project Site

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
Acanthomintha duttonii San Mateo thorn-mint	FE/SE G1/S1 1B.1	Annual herb. Chaparral, valley and foothill grassland. Serpentinite. Elevations: 165-985 feet. Blooms Apr-Jun.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, there are no documented CNDDB occurrences of the species within 3 miles of the project area.
Allium peninsulare var. franciscanum Franciscan onion	None/None G4G5T2/S2 1B.2	Perennial bulbiferous herb. Cismontane woodland, valley and foothill grassland. Clay, Serpentinite (often), volcanic. Elevations: 170-1,000 feet. Blooms (Apr) May-Jun.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Additionally, the most recent documented CNDDB occurrence of the species is 2 miles away from the project area, dated from 1949.
Amsinckia lunaris bent-flowered fiddleneck	None/None G3/S3 1B.2	Annual herb. Cismontane woodland, coastal bluff scrub, valley and foothill grassland. Elevations: 10-1,640 feet. Blooms Mar-Jun.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, there are no documented CNDDB occurrences of the species within 5 miles of the project area.
Arctostaphylos regismontana Kings Mountain manzanita	None/None G2/S2 1B.2	Perennial evergreen shrub. Broadleafed upland forest, chaparral, north coast coniferous forest. Granitic, sandstone. Elevations: 1,000-2,395 feet. Blooms Dec-Apr.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. The project area is out side of the known elevation range of the species.
Astragalus tener var. tener alkali milk-vetch	None/None G2T1/S1 1B.2	Annual herb. Playas, valley and foothill grassland, vernal pools. Alkaline. Elevations: 5-195 feet. Blooms Mar-Jun.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Although there is a recently documented occurrence of the species within 1 mile of the project area, dated from 2002, this occurrence is located close to the San Francisco Bay in habitat types not present in the project area.
Atriplex depressa brittlescale	None/None G2/S2 1B.2	Annual herb. Chenopod scrub, meadows and seeps, playas, valley and foothill grassland, vernal pools. Alkaline, clay. Elevations: 5-1,050 feet. Blooms Apr-Oct.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. There are no documented CNDDB occurrences of the species within 3 miles of the project area.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
Atriplex minuscula lesser saltscale	None/None G2/S2 1B.1	Annual herb. Chenopod scrub, playas, valley and foothill grassland. Alkaline, sandy. Elevations: 50-655 feet. Blooms May-Oct.	Low Potential	Suitable habitat for this species is not present in or adjacent to the project area. There are no documented CNDDB occurrences of the species within 5 miles of the project area.
Centromadia parryi ssp. congdonii Congdon's tarplant	None/None G3T2/S2 1B.1	Annual herb. Valley and foothill grassland. Alkaline soils, sometimes described as heavy white clay. Elevations: 0-755 feet. Blooms May-Oct (Nov).	Low Potential	Suitable habitat for this species is not present in or adjacent to the project area. Although there are two recently documented CNDDB occurrences within one mile of the project area, dated from 2019, these occurrences are located close to the San Francisco Bay in habitat types not found in the project area.
Chloropyron maritimum ssp. palustre Point Reyes salty bird's-beak	None/None G4?T2/S2 1B.2	Annual herb (hemiparasitic). Marshes and swamps. Usually in coastal salt marsh with Salicornia, Distichlis, Jaumea, Spartina, etc. Elevations: 0-35 feet. Blooms Jun-Oct.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Although the most recently documented CNDDB occurrence of the species is within one mile of the project area from 1987, it is located close to the San Francisco Bay in habitat types not present in the project area.
Chorizanthe robusta var. robusta robust spineflower	FE/None G2T1/S1 1B.1	Annual herb. Chaparral, cismontane woodland, coastal dunes, coastal scrub. Gravelly (sometimes), sandy (sometimes). Elevations: 10-985 feet. Blooms Apr-Sep.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, there is only one documented occurrence of this species in the 9-quad search area and it is over 10 miles from the project area, dated from 1882.
Cirsium fontinale var. fontinale fountain thistle	FE/SE G2T1/S1 1B.1	Perennial herb. Chaparral, cismontane woodland, meadows and seeps, valley and foothill grassland. Seeps, serpentinite. Elevations: 150-575 feet. Blooms (Apr) May-Oct.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Additionally, there are no documented CNDDB occurrences of the species within 5 miles of the project area.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
Cirsium praeteriens lost thistle	None/None GX/SX 1A	Perennial herb. Although not seen since 1901, this Cirsium is thought to be quite distinct from other Cirsiums acc. to D. Keil. Elevations: 0-330 feet. Blooms Jun-Jul.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of the species is 2 miles away from the project area, dated from 1901.
Collinsia corymbosa round-headed collinsia	None/None G1/S1 1B.2	Annual herb. Coastal dunes. Elevations: 0-65 feet. Blooms Apr-Jun.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Additionally, the most recent documented CNDDB occurrence of the species is 2 miles away from the project area, dated from 1893.
Collinsia multicolor San Francisco collinsia	None/None G2/S2 1B.2	Annual herb. Closed-cone coniferous forest, coastal scrub. Serpentinite (sometimes). Elevations: 100-900 feet. Blooms (Feb) Mar-May.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Additionally, the most recent documented CNDDB occurrence of the species is 2 miles away from the project area, dated from 1903.
Dirca occidentalis western leatherwood	None/None G2/S2 1B.2	Perennial deciduous shrub. Broadleafed upland forest, chaparral, cismontane woodland, closed-cone coniferous forest, north coast coniferous forest, riparian forest, riparian woodland. On brushy slopes, mesic sites; mostly in mixed evergreen and foothill woodland communities. Elevations: 80-1,395 ft. Blooms Jan-Mar (Apr).	Low Potential	Suitable habitat for this species is not present in or adjacent to the project area. The most recent documented CNDDB occurrence of the species is located in the foothills 2 miles south of the project area, dated from 2021.
Eriophyllum latilobum San Mateo woolly sunflower	FE/SE G1/S1 1B.1	Perennial herb. Cismontane woodland, coastal scrub, lower montane coniferous forest. Often on roadcuts; found on and off of serpentine. Elevations: 150-1,085 feet. Blooms May-Jun.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, there are no documented CNDDB occurrences of the species within 5 miles of the project area.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
Eryngium aristulatum var. hooveri Hoover's button-celery	None/None G5T1/S1 1B.1	Annual/perennial herb. Vernal pools. Alkaline depressions, vernal pools, roadside ditches and other wet places near the coast. Elevations: 10-150 feet. Blooms (Jun) Jul (Aug).	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of the species is approximately 10 miles away from the project area, dated from 2009.
Eryngium jepsonii Jepson's coyote-thistle	None/None G2/S2 1B.2	Perennial herb. Valley and foothill grassland, vernal pools. Clay. Elevations: 10-985 feet. Blooms Apr-Aug.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, there are no documented CNDDB occurrences of the species within 5 miles of the project area.
Extriplex joaquinana San Joaquin spearscale	None/None G2/S2 1B.2	Annual herb. Chenopod scrub, meadows and seeps, playas, valley and foothill grassland. In seasonal alkali wetlands or alkali sink scrub with Distichlis spicata, Frankenia, etc. Elevations: 5-2,740 feet. Blooms Apr-Oct.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of the species is approximately 10 miles away from the project area, dated from 2011.
Fissidens pauperculus minute pocket moss	None/None G3?/S2 1B.2	Moss. North coast coniferous forest. Moss growing on damp soil along the coast. In dry streambeds and on stream banks. Elevations: 35-3,360 feet.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, there are no documented CNDDB occurrences of the species within 5 miles of the project area.
Fritillaria liliacea fragrant fritillary	None/None G2/S2 1B.2	Perennial bulbiferous herb. Cismontane woodland, coastal prairie, coastal scrub, valley and foothill grassland. Often on serpentine; various soils reported though usually on clay, in grassland. Elevations: 10-1,345 feet. Blooms Feb-Apr.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Additionally, the most recent documented CNDDB occurrence of the species is 3 miles away from the project area, dated from 1934.
Hesperolinon congestum Marin western flax	FT/ST G1/S1 1B.1	Annual herb. Chaparral, valley and foothill grassland. In serpentine barrens and in serpentine grassland and chaparral. Elevations: 15-1,215 feet. Blooms Apr-Jul.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Additionally, there are no documented CNDDB occurrences of the species within 5 miles of the project area.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
Hoita strobilina Loma Prieta hoita	None/None G2?/S2? 1B.1	Perennial herb. Chaparral, cismontane woodland, riparian woodland. Serpentine; mesic sites. Elevations: 100-2,820 feet. Blooms May-Jul (Aug-Oct).	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of the species is approximately 5 miles from the project area, dated from 1913.
Lasthenia conjugens Contra Costa goldfields	FE/None G1/S1 1B.1	Annual herb. Cismontane woodland, playas, valley and foothill grassland, vernal pools. Vernal pools, swales, low depressions, in open grassy areas. Elevations: 0-1,540 feet. Blooms Mar-Jun.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, most recent documented CNDDB occurrence of the species is approximately 10 miles from the project area, dated from 2011.
Legenere limosa legenere	None/None G2/S2 1B.1	Annual herb. Vernal pools. In beds of vernal pools. Elevations: 5-2,885 feet. Blooms Apr-Jun.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Additionally, there are no documented CNDDB occurrences of the species within 5 miles of the project area.
Malacothamnus arcuatus var. arcuatus arcuate bushmallow	None/None G2Q/S2 1B.2	Chaparral, Cismontane woodland. Gravelly alluvium. 49-1,165 feet. Blooms Apr-Sep.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. The most recent documented CNDDB occurrences of the species are located in the foothills 2 miles south of the project area, dated from 2021 and 2022.
Malacothamnus hallii Hall's bushmallow	None/None G2/S2 1B.2	Perennial deciduous shrub. Chaparral, coastal scrub. Some populations on serpentine. Elevations: 35-2,495 feet. Blooms (Apr) May-Sep (Oct).	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, most recent documented CNDDB occurrence of the species is approximately 10 miles from the project area, dated from 1955.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
Monolopia gracilens woodland woollythreads	None/None G3/S3 1B.2	Annual herb. Broadleafed upland forest, chaparral, cismontane woodland, north coast coniferous forest, valley and foothill grassland. Grassy sites, in openings; sandy to rocky soils. Often seen on serpentine after burns, but may have only weak affinity to serpentine. Elevations: 330-3,935 feet. Blooms (Feb) Mar-Jul.	Low Potential	Suitable habitat for this species is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrences of the species are located in the foothills approximately 2 - 3 miles south of the project area, dated from 2021-2023.
Navarretia prostrata prostrate vernal pool navarretia	None/None G2/S2 1B.2	Annual herb. Coastal scrub, meadows and seeps, valley and foothill grassland, vernal pools. Alkaline soils in grassland, or in vernal pools. Mesic, alkaline sites. Elevations: 10-3,970 feet. Blooms Apr-Jul.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of the species is approximately 10 miles from the project area, dated from 2003.
Pedicularis dudleyi Dudley's lousewort	None/SR G2/S2 1B.2	Perennial herb. Chaparral, cismontane woodland, north coast coniferous forest, valley and foothill grassland. Deep shady woods of older coast redwood forests; also in maritime chaparral. Elevations: 195-2,955 feet. Blooms Apr-Jun.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Additionally, there are no documented CNDDB occurrences of the species within 5 miles of the project area.
Piperia candida white-flowered rein orchid	None/None G3?/S3 1B.2	Perennial herb. Broadleafed upland forest, lower montane coniferous forest, north coast coniferous forest. Sometimes on serpentine. Forest duff, mossy banks, rock outcrops, and muskeg. Elevations: 100-4,300 feet. Blooms (Mar) May-Sep.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Additionally, the most recent documented CNDDB occurrence of the species is located in the foothills approximately 5 miles south of the project area, dated from 1992.
Plagiobothrys chorisianus var. chorisianus Choris' popcornflower	None/None G3T1Q/S1 1B.2	Annual herb. Chaparral, coastal prairie, coastal scrub. Mesic sites. Elevations: 10-525 feet. Blooms Mar-Jun.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Additionally, there are no documented CNDDB occurrences of the species within 5 miles of the project area.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
Plagiobothrys glaber hairless popcornflower	None/None GX/SX 1A	Annual herb. Marshes and swamps, meadows and seeps. Coastal salt marshes and alkaline meadows. Elevations: 50-590 feet. Blooms Mar-May.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Additionally, the most recent documented CNDDB occurrence of the species is approximately 10 miles away from the project area, dated from 1892.
Puccinellia simplex California alkali grass	None/None G2/S2 1B.2	Annual herb. Chenopod scrub, meadows and seeps, valley and foothill grassland, vernal pools. Alkaline, vernally mesic. Sinks, flats, and lake margins. Elevations: 5-3,050 feet. Blooms Mar-May.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Additionally, the most recent documented CNDDB occurrence of the species is approximately 10 miles away from the project area, dated from 2003.
Ravenella exigua chaparral harebell	None/None G2/S2 1B.2	Chaparral (rocky, usually serpentinite). Rocky sites, usually on serpentine in chaparral. 902-4,101 feet. Blooms May-Jun.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, there are no documented CNDDB occurrences of the species within 5 miles of the project area.
Sagittaria sanfordii Sanford's arrowhead	None/None G3/S3 1B.2	Perennial rhizomatous herb (emergent). Marshes and swamps. In standing or slow-moving freshwater ponds, marshes, and ditches. Elevations: 0-2,135 feet. Blooms May-Oct (Nov).	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of the species is located near the San Francisco Bay approximately 4 miles away from the project area, dated from 2019.
Senecio aphanactis chaparral ragwort	None/None G3/S2 1B.2	Annual herb. Chaparral, cismontane woodland, coastal scrub. Drying alkaline flats. Elevations: 50-2,625 feet. Blooms Jan-Apr (May).	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of the species is located in the foothills approximately 5 miles south of the project area, dated from 1974.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
Spergularia macrotheca var. longistyla long-styled sand-spurrey	None/None G5T2/S2 1B.2	Perennial herb. Marshes and swamps, meadows and seeps. Alkaline. Elevations: 0-835 feet. Blooms Feb-May.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Additionally, there are no documented CNDDB occurrences of the species within 5 miles of the project area.
Streptanthus albidus ssp. peramoenus most beautiful jewelflower	None/None G2T2/S2 1B.2	Annual herb. Chaparral, cismontane woodland, valley and foothill grassland. Serpentine outcrops, on ridges and slopes. Elevations: 310-3,280 feet. Blooms (Mar) Apr-Sep (Oct).	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Additionally, there are no documented CNDDB occurrences of the species within 5 miles of the project area.
Stuckenia filiformis ssp. alpina northern slender pondweed	None/None G5T5/S2S3 2B.2	Perennial rhizomatous herb (aquatic). Marshes and swamps. Shallow, clear water of lakes and drainage channels. Elevations: 985-7,055 feet. Blooms May-Jul.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. The project area is outside of the known elevation range of the species.
Suaeda californica California seablite	FE/None G1/S1 1B.1	Perennial evergreen shrub. Marshes and swamps. Margins of coastal salt marshes. Elevations: 0-50 feet. Blooms Jul-Oct.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Although the most recent documented CNDDB occurrence of the species is approximately 1 mile away from the project area, dated from 1971, it is found in habitat types not present in the project area.
Trifolium amoenum two-fork clover	FE/None G1/S1 1B.1	Annual herb. Coastal bluff scrub, valley and foothill grassland. Sometimes on serpentine soil, open sunny sites, swales. Most recently cited on roadside and eroding cliff face. Elevations: 15-1,360 feet. Blooms Apr-Jun.	Low Potential	Suitable habitat for this species is not present in or adjacent to the project area. In addition, there are no documented CNDDB occurrences of the species within 5 miles of the project area.
Trifolium buckwestiorum Santa Cruz clover	None/None G2/S2 1B.1	Annual herb. Broadleafed upland forest, cismontane woodland, coastal prairie. Moist grassland. Gravelly margins. Elevations: 345-2,000 feet. Blooms Apr-Oct.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, there are no documented CNDDB occurrences of the species within 5 miles of the project area.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements	Potential to Occur	Rationale
Trifolium hydrophilum saline clover	None/None G2/S2 1B.2	Annual herb. Marshes and swamps, valley and foothill grassland, vernal pools. Mesic, alkaline sites. Elevations: 0-985 feet. Blooms Apr-Jun.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, most recent documented CNDDB occurrence of the species is approximately 10 miles away from the project area, dated from 2019.

Regional Vicinity refers to within a three mile search radius of site.

Status (Federal/State)

FE = Federal Endangered
FT = Federal Threatened
FC = Federal Candidate
SE = State Endangered
ST = State Threatened
SR = State Rare

CRPR (CNPS California Rare Plant Rank)

1A = Presumed extirpated in California, and rare or extinct elsewhere
1B = Rare, Threatened, or Endangered in California and elsewhere
2A = Presumed extirpated in California, but common elsewhere
2B= Rare, Threatened, or Endangered in California, but more common elsewhere
3 = Need more information (Review List)
4 = Limited Distribution (Watch List)

CRPR Threat Code Extension

.1 = Seriously endangered in California (>80% of occurrences threatened/high degree and immediacy of threat)
.2 = Moderately threatened in California (20-80% of occurrences threatened/moderate degree and immediacy of threat)
.3 = Not very endangered in California (<20% of occurrences threatened/low degree and immediacy of threat)

Other Statuses

G1 or S1 Critically Imperiled Globally or Subnationally (state)
G2 or S2 Imperiled Globally or Subnationally (state)
G3 or S3 Vulnerable to extirpation or extinction Globally or Subnationally (state)
G4/5 or S4/5 Apparently secure, common and abundant
GH or SH Possibly Extirpated – missing; known from only historical occurrences but still some hope of rediscovery

Additional notations may be provided as follows

T – Intraspecific Taxon (subspecies, varieties, and other designations below the level of species)
Q – Questionable taxonomy that may reduce conservation priority
? – Inexact numeric rank

Special-Status Wildlife Species in the Regional Vicinity of the Project Site

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements	Potential to Occur	Rationale
Invertebrates				
Bombus crotchii Crotch's bumble bee	None/SCE G2/S2	Coastal California east to the Sierra-Cascade crest and south into Mexico. This species is a generalist and feeds on many different flowering plant species.	Moderate Potential	Suitable floral resources for foraging may occur in or adjacent to the project area. There is one recent documented CNDDB occurrence of the species just north of the project area, dated from 2023.
Danaus plexippus plexippus pop. 1 monarch - California overwintering population	FPT/None G4T1T2Q/S2	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. This species requires milkweed plants during its breeding period.	Moderate Potential	Suitable winter roosting sites are likely not present in the project area. However, there is potential for milkweed species to occur in and adjacent to the project area.
Euphydryas editha bayensis Bay checkerspot butterfly	FT/None G4G5T1/S3	Restricted to native grasslands on outcrops of serpentine soil in the vicinity of San Francisco Bay. Plantago erecta is the primary host plant; Orthocarpus densiflorus and O. purpurscens are the secondary host plants.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. There are no documented CNDDB occurrences of the species within 5 miles of the project area.
Lepidurus packardi vernal pool tadpole shrimp	FE/None G3/S3	Inhabits vernal pools and swales in the Sacramento Valley containing clear to highly turbid water. Pools commonly found in grass-bottomed swales of unplowed grasslands. Some pools are mud-bottomed and highly turbid.	Not Expected	Suitable vernal pool habitat does not occur in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of the species is approximately 10 miles away from the project area, dated from 2004.
Fish				
Acipenser medirostris pop. 1 green sturgeon - southern DPS	FT/None G2T1/S1 SSC	Spawning site fidelity. Spawns in the Sacramento, Feather and Yuba Rivers. Presence in upper Stanislaus and San Joaquin Rivers may indicate spawning. Non-spawning adults occupy marine/estuarine waters. Delta Estuary is important for rearing juveniles. Spawning occurs primarily in cool (52-59 F) sections of mainstem rivers in deep pools (26-30 feet) with substrate containing small to medium sized sand, gravel, cobble, or boulder.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area as it does not include the Bay or shoreline. In addition, there is only one documented occurrence of this species in the 9-quad search area and it is over 20 miles from the project area, dated from 2016.

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements	Potential to Occur	Rationale
Oncorhynchus mykiss irideus pop. 8 steelhead - central California coast DPS	FT/None G5T3Q/S3 SSC	DPS includes all naturally spawned populations of steelhead (and their progeny) in streams from the Russian River to Aptos Creek, Santa Cruz County, California (inclusive). Also includes the drainages of San Francisco and San Pablo Bays.	Moderate Potential	Suitable aquatic habitat may occur in the project area. Stevens Creek contains partial barriers to fish passage; however, Permanente Creek has not been assessed. Therefore, this species has the potential to use these creeks as corridors.
Spirinchus thaleichthys pop. 2 longfin smelt - San Francisco Bay-Delta DPS	FE/ST G5TNRQ/S1	Pelagic and anadromous within the Sacramento-San Joaquin River Delta, San Francisco Bay, and Gulf of the Farallones. Spawns in lower freshwater reaches of Sacramento and San Joaquin Rivers. First year in Suisun Bay; later SF Bay or Gulf of the Farallones. Occurs in salinities ranging from pure freshwater to pure saltwater; typically salinities ranging from 14-28 parts per thousand (ppt). Generally occupies water temperatures from 61-68F, with spawning occurring in water temperatures from 41-58F.	Not Expected	Suitable saltwater habitat may occur in the City of Mountain View closer to the San Francisco Bay. However, the project area does not include the Bay or shoreline. In addition, the most recent documented CNDDB occurrence of this species is approximately 10 miles away from the project area, dated from 1995.
Reptiles				
Actinemys marmorata northwestern pond turtle	FPT/None G2/SNR SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6,000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.3 feet from water for egg-laying. Occurs in northern California, south along the Sierra Nevada Mountains and the Coast Range down to Monterey and Kern Counties.	Moderate Potential	Suitable aquatic habitat is present in the project area. There are 3 recent documented CNDDB occurrences of the species within the project area from 2021 and 2022.
Chelonia mydas green sea turtle	FT/None G3/S1	Primarily herbivores, eating mostly seagrasses and algae. Found worldwide primarily in subtropical and temperate regions of the Atlantic, Pacific, and Indian Oceans, and in the Mediterranean Sea. They undertake long distance oceanic migrations. Require sandy beaches for nesting.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Suitable nesting habitat also does not occur in or adjacent to the project area.

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements	Potential to Occur	Rationale
Anniella pulchra Northern California legless lizard	None/None G3/S2S3 SSC	Sandy or loose loamy soils under sparse vegetation. Soil moisture is essential. They prefer soils with a high moisture content. Common in several habitats, but especially in coastal dune, valley foothill, chaparral, and coastal scrub types.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of this species is approximately 10 miles away from the project area, dated from 1949.
Masticophis lateralis euryxanthus Alameda whipsnake	FT/ST G4T2/S2	Typically found in chaparral and scrub habitats but will also use adjacent grassland, oak savanna and woodland habitats. Mostly south-facing slopes and ravines, with rock outcrops, deep crevices or abundant rodent burrows, where shrubs form a vegetative mosaic with oak trees and grasses.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area as it is highly developed and isolated. This species does not occur in developed parks or undeveloped lots. Additionally, there are no documented CNDDB occurrences of the species within 5 miles of the project area.
Thamnophis sirtalis tetrataenia San Francisco gartersnake	FE/SE G5T2Q/S2 CDFW FP	Vicinity of freshwater marshes, ponds and slow-moving streams in San Mateo County and extreme northern Santa Cruz County. Prefers dense cover and water depths of at least one foot. Upland areas near water are also very important.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. Although there are 3 recent documented CNDDB occurrences of the species 1 mile away from the project area, dated from 2002 - 2012, there is no connection to the project area. This species is highly sensitive to human disturbance and is not found in urban areas.
Amphibians				
Ambystoma californiense pop. 1 California tiger salamander - central California DPS	FT/ST G2G3T3/S3 WL	Lives in vacant or mammal-occupied burrows throughout most of the year; in grassland, savanna, or open woodland habitats. Need underground refuges, especially ground squirrel burrows, and vernal pools or other seasonal water sources for breeding. This species can move up to 1.3 miles through uplands between aquatic habitats.	Low Potential	Suitable aquatic habitat does not occur in the project area. Although there may be some isolated grassland habitat in the project area, it is not connected to suitable aquatic habitat and is likely highly disturbed. The most recent documented CNDDB occurrence of the species is 3 miles away from the project area, dated from 2022.
Aneides niger Santa Cruz black salamander	None/None G3/S3 SSC	Mixed deciduous and coniferous woodlands and coastal grasslands in San Mateo, Santa Cruz, and	Low Potential	Suitable habitat for this species is not present in or adjacent to the project area as it does not include the Bay or shoreline. In addition, the most recent documented

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements	Potential to Occur	Rationale
		Santa Clara counties. Adults found under rocks, talus, and damp woody debris.		CNDDB occurrence of the species is 2 miles away from the project area, dated from 1989.
Dicamptodon ensatus California giant salamander	None/None G2G3/S2S3 SSC	Known from wet coastal forests near streams and seeps from Mendocino County south to Monterey County, and east to Napa County. Aquatic larvae found in cold, clear streams, occasionally in lakes and ponds. Adults known from wet forests under rocks and logs near streams and lakes.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of this species is located in the foothills approximately 10 miles south of the project area, dated from 2014.
Rana boylii pop. 4 foothill yellow-legged frog - central coast DPS	FT/SE G3T2/S2	San Francisco Peninsula and Diablo Range south of San Francisco Bay Estuary, and south through the Santa Cruz and Gabilan Mountains east of the Salinas River in the southern inner Coast Ranges. Partly shaded shallow streams and riffles with a rocky substrate in a variety of habitats. Needs at least some cobble-sized substrate for egg-laying and at least 15 weeks to attain metamorphosis.	Not Expected	Although there may be suitable aquatic habitat in the project area, the most recent documented occurrence is 2 miles away from the project area, dated from 1907. The isolated, shaded, and urban nature of Stevens Creek And Permanente Creek likley precludes this speceis from occurring.
Rana draytonii California red-legged frog	FT/None G2G3/S2S3 SSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to burrows or other cool aestivation habitats during the hot, dry summer months.	Moderate Potential	Suitable aquatic habitat may be present in the creeks in the project area, and t.
Taricha rivularis red-bellied newt	None/None G2/S2 SSC	Inhabits primarily redwood forest, but also found within mixed conifer, valley-foothill woodland, montane hardwood and hardwood-conifer habitats. Coastal drainages from Humboldt County south to Sonoma County, inland to Lake County. Isolated population of uncertain origin in Santa Clara County. Lives in terrestrial habitats, juveniles generally underground, adults active at surface in moist environments. Will migrate over 1 km to breed, typically in streams with moderate flow and clean, rocky substrate.	Not Expected	Suitable habitat for this species is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of this species is located in the foothills approximately 10 miles south of the project area, dated from 2016.

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements	Potential to Occur	Rationale
Birds				
Accipiter cooperii Cooper's hawk	None/None G5/S4 CDFW WL	Woodland, chiefly of open, interrupted or marginal type. Forages in woodland areas, along forest edges, or in fields. Nest sites mainly in riparian growths of deciduous trees, as in canyon bottoms on river flood-plains; also, live oaks.	Low Potential	Although suitable nesting and foraging habitat for this species may be present along the creek corridors in the project area, the most recent documented CNDDB occurrence of the species is approximately 6 miles south of the project area, dated from 2003.
Agelaius tricolor tricolored blackbird	None/ST G1G2/S2 SSC USFWS BCC	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and grassland and cropland habitats with insect prey within a few miles of the colony. Breeds near fresh water, preferably in emergent wetlands with tall, dense cattails or tules, but also in thickets of willow, blackberry, wild rose, and/or tall herbs.	Not Expected	Suitable nesting and foraging habitat for this species is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of the species is approximately 10 miles away from the project area, dated from 1995.
Aquila chrysaetos golden eagle	None/None G5/S3 CDFW FP CDFW WL	Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.	Not Expected	Suitable foraging and nesting habitat does not occur in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of the species is approximately 10 miles away from the project area, dated from 2021.
Asio flammeus short-eared owl	None/None G5/S2 SSC USFWS BCC	Found in swamp lands, both fresh and salt; lowland meadows; irrigated alfalfa fields. Tule patches/tall grass needed for nesting/daytime seclusion. Nests on dry ground in depression concealed in vegetation.	Not Expected	Suitable foraging habitat and nesting habitat does not occur in or adjacent to the project area. There are no documented CNDDB occurrences of the species within a 9-quad search area of the project area.
Asio otus long-eared owl	None/None G5/S3? SSC USFWS BCC	Riparian bottomlands grown to tall willows and cottonwoods; also, belts of live oak paralleling stream courses. Require adjacent open land, productive of mice and the presence of old nests of crows, hawks, or magpies for breeding.	Not Expected	Suitable foraging and nesting habitat does not occur in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of the species is located in the hills approximately 10 miles south of the project area, dated from 1987.

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements	Potential to Occur	Rationale
Athene cunicularia burrowing owl	None/SCE G4/S2 SSC USFWS BCC	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Moderate Potential	There is suitable foraging and nesting habitat for this species in and adjacent to the project area. There are 6 recent documented CNDDB occurrences of the species in the vicinity of the project area dated from 2002 - 2016.
Brachyramphus marmoratus marbled murrelet	FT/SE G3/S2	Feeds near-shore; nests inland along coast from Eureka to Oregon border and from Half Moon Bay to Santa Cruz. Nests in old-growth redwood-dominated forests, up to six miles inland, often in Douglas-fir.	Not Expected	Suitable foraging and nesting habitat does not occur in or adjacent to the project area. There are no documented CNDDB occurrences of the species within a 9-quad search area of the project area.
Buteo swainsoni Swainson's hawk	None/ST G5/S4	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.	Low Potential	Although suitable nesting habitat may occur in the project area, there is a general lack of suitable foraging habitat within 10 miles of the project area. The most recent documented CNDDB occurrence of this species is approximately 10 miles away from the project area, dated from 1889.
Charadrius nivosus nivosus western snowy plover	FT/None G3T3/S3 SSC	Sandy beaches, salt pond levees and shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting.	Low Potential	Suitable nesting and foraging habitat may be present in the City of Mountain View, however suitable nesting and foraging habitat is not present in or adjacent to the project area. Although there is one recent documented CNDDB occurrence of the species 1 mile away from the project area, dated from 2002, and one recent documented CNDDB occurrence of the species 2 miles away from the project area, dated from 2009, both of are located along the shoreline in habitats not present in the project area.
Circus hudsonius northern harrier	None/None G5/S3 SSC USFWS BCC	Coastal salt and freshwater marsh. Nest and forage in grasslands, from salt grass in desert sink to mountain cienagas. Nests on ground in shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.	Low Potential	Although suitable nesting and foraging habitat may be present near the shoreline, it is not present in or adjacent to the project area.

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements	Potential to Occur	Rationale
Coccyzus americanus occidentalis western yellow-billed cuckoo	FT/SE G5T2T3/S1	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	Not Expected	Suitable foraging habitat and nesting habitat does not occur in or adjacent to the project area. Additionally, there are no documented CNDDB occurrences of the species within a 9-quad search of the project area.
Coturnicops noveboracensis yellow rail	None/None G4/S2 SSC USFWS BCC	Summer resident in eastern Sierra Nevada in Mono County. Freshwater marshlands. Winters in the Suisun Marsh and San Francisco Bay estuary areas with marshland.	Low Potential	Suitable wintering habitat may occur in the City of Mountain View along the shoreline. However, suitable foraging and nesting habitat does not occur in the project area. In addition, the most recent documented CNDDB occurrence of the species within 1 mile of the project area, dated from 1988, is from the shoreline.
Elanus leucurus white-tailed kite	None/None G5/S3S4 FP	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	Low Potential	Although suitable nest trees may be present in the project area, the project area lacks suitable foraging habitat, and the most recent documented CNDDB occurrence of the species 2 miles away from the study area from 2005.
Geothlypis trichas sinuosa saltmarsh common yellowthroat	None/None G5T3/S3 SSC USFWS BCC	Resident of the San Francisco Bay region, in fresh and salt water marshes. Requires thick, continuous cover down to water surface for foraging; tall grasses, tule patches, willows for nesting.	Low Potential	Although suitable salt water marsh habitat may be present in the City of Mountain View on the shoreline, suitable foraging and nesting habitat is not present in or adjacent to the project area. There are 2 recent documented CNDDB occurrences of the species located near the coast dated from 2016.
Gymnogyps californianus California condor	FE/SE G1/S2 CDFW FP	Require vast expanses of open savannah, grasslands, and foothill chaparral in mountain ranges of moderate altitude. Deep canyons containing clefts in the rocky walls provide nesting sites. Forages up to 100 miles from roost/nest.	Not Expected	Suitable nesting and foraging habitat is not present in or adjacent to the project area. Additionally, there are no documented CNDDB occurrences of the species within a 9-quad search of the project area.

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements	Potential to Occur	Rationale
Haliaeetus leucocephalus bald eagle	FD/SE G5/S3 FP	Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests within 1 mile of water. Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter.	Low Potential	The urban nature of the project area likely precludes this species from occurring. Although suitable nest trees may occur in the project area, the most recent documented CNDDB occurrence of the species is located in the foothills south of Palo Alto, dated from 2016.
Laterallus jamaicensis coturniculus California black rail	None/ST G3T1/S2 FP	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.	Low Potential	Suitable saltwater marsh habitat bordering larger bays is present in the City of Mountain View. However, suitable nesting and foraging habitat does not occur in or adjacent to the project area. There are 2 recent documented CNDDB occurrences of the species located along the shoreline within the City of Mountain View, dated from 2012 and 2014.
Melospiza melodia pusillula Alameda song sparrow	None/None G5T2T3/S2 SSC USFWS BCC	Resident of salt marshes bordering south arm of San Francisco Bay. Inhabits Salicornia marshes; nests low in Grindelia bushes (high enough to escape high tides) and in Salicornia.	Low Potential	Suitable salt marsh habitat likely occurs along the shoreline of the City of Mountain View. However, suitable nesting and foraging habitat does not occur in or adjacent to the project area. There are 2 recent documented CNDDB occurrences of the species located in habitats along the shoreline between 1 - 2 miles away from the project area, dated from 2004.
Nannopterum auritum double-crested cormorant	None/None G5/S4 WL	Colonial nester on coastal cliffs, offshore islands, and along lake margins in the interior of the state. Nests along coast on sequestered islets, usually on ground with sloping surface, or in tall trees along lake margins.	Not Expected	Suitable nesting and foraging habitat does not occur in or adjacent to the project area. In addition, there are no documented CNDDB occurrences of the species within a 9-quad search of the project area.

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements	Potential to Occur	Rationale
Rallus obsoletus obsoletus California Ridgway's rail	FE/SE G3T1/S2 FP	Salt water and brackish marshes traversed by tidal sloughs in the vicinity of San Francisco Bay. Associated with abundant growths of pickleweed, but feeds away from cover on invertebrates from mud-bottomed sloughs.	Not Expected	Suitable saltwater marsh habitat is likely present along the shoreline of the City of Mountain View. However, suitable foraging and nesting habitat is not present in or adjacent to the project area. Additionally, there is one recent documented CNDDB occurrences of the species near the shoreline within the City of Mountain View, dated from 2001.
Riparia riparia bank swallow	None/ST G5/S3	Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.	Not Expected	Suitable nesting habitat with vertical banks/cliffs are not present in or adjacent to the project area. In addition, there are no documented CNDDB occurrences of the species within a 9-quad search of the project area.
Rynchops niger black skimmer	None/None G5/S2 SSC USFWS BCC	Nests on gravel bars, low islets, and sandy beaches, in unvegetated sites. Nesting colonies usually less than 200 pairs.	Not Expected	Suitable nesting habitat is not present in or adjacent to the project area.
Sternula antillarum browni California least tern	FE/SE G4T2T3Q/S2 FP	Nests along the coast from San Francisco Bay south to northern Baja California. Colonial breeder on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, landfills, or paved areas.	Low Potential	Suitable nesting and foraging habitat is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of the species within the City of Mountain View is dated from 1987.
Mammals				
Antrozous pallidus pallid bat	None/None G4/S3 SSC WBWG High	Found in a variety of habitats including deserts, grasslands, shrublands, woodlands, and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts in crevices of rock outcrops, caves, mine tunnels, buildings, bridges, and hollows of live and dead trees which must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	Low Potential	Although the most recent documented CNDDB occurrences of the species within the vicinity of the project area are dated from 1945 and 1951, suitable foraging and roosting habitat is likely present along the creek corridors and parks in the project area.

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements	Potential to Occur	Rationale
Corynorhinus townsendii Townsend's big-eared bat	None/None G4/S2 SSC WBWG High	Occurs throughout California in a wide variety of habitats. Most common in mesic sites, typically coniferous or deciduous forests. Roosts in the open, hanging from walls and ceilings in caves, lava tubes, bridges, and buildings. This species is extremely sensitive to human disturbance.	Low Potential	Suitable foraging and roosting habitat is present in the project area, and there are 2 recent documented CNDDB occurrences of the species within the City of Mountain View, dated from 2015 and 2017.
Neotoma fuscipes annectens San Francisco dusky-footed woodrat	None/None G5T2T3/S2S3 SSC	Typically found in forest habitats with moderate to dense understory. Can occur in chaparral, riparian woodlands, and coniferous forests, particularly redwood. Builds middens out of grasses, leaves, and woody debris. This subspecies is found only in the San Francisco Bay region.	Not Expected	Suitable habitat is not present in the or adjacent to the project area. Additionally, the project area is outside of the known range of this species. There is a recent documented CNDDB occurrence of the species 1 mile away from the project area, dated from 2016, that has no connectivity to the site.
Reithrodontomys raviventris salt-marsh harvest mouse	FE/SE G1G2/S3 FP	Only in the saline emergent wetlands of San Francisco Bay and its tributaries. Pickleweed is primary habitat, but may occur in other marsh vegetation types and in adjacent upland areas. Does not burrow; builds loosely organized nests. Requires higher areas for flood escape.	Not Expected	Suitable habitat is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of the species is along the shoreline within the City of Mountain View, dated from 1991.
Sorex vagrans halicoetes salt-marsh wandering shrew	None/None G5T1/S1 SSC	Salt marshes of the south arm of San Francisco Bay. Medium high marsh 6-8 ft above sea level where abundant driftwood is scattered among Salicornia.	Not Expected	Suitable habitat is not present in or adjacent to the project area. In addition, the most recent documented CNDDB occurrence of the species is located close to the shoreline approximately 2 miles away from the project area, dated from 1951.

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements	Potential to Occur	Rationale
Taxidea taxus American badger	None/None G5/S3 SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Not Expected	Suitable habitat is not present in or adjacent to the project area due to high levels of disturbance and a lack of large areas of natural grasslands. There is one recent documented CNDDB occurrences of the species 1 mile away from the project area and one occurrence 2 miles away from the project area, both dated from 2019, that are located outside of urban areas.

Regional Vicinity refers to within a three mile search radius of site.

Status (Federal/State)

FE = Federal Endangered

FT = Federal Threatened

FPT = Federal Proposed Threatened

FD = Federal Delisted

FC = Federal Candidate

SE = State Endangered

ST = State Threatened

SCE = State Candidate Endangered

SSC = CDFW Species of Special Concern

FP = CDFW Fully Protected

Other Statuses

G1 or S1 Critically Imperiled Globally or Subnationally (state)

G2 or S2 Imperiled Globally or Subnationally (state)

G3 or S3 Vulnerable to extirpation or extinction Globally or Subnationally (state)

G4/5 or S4/5 Apparently secure, common and abundant

GH or SH Possibly Extirpated – missing; known from only historical occurrences but still some hope of rediscovery

Additional notations may be provided as follows

T – Intraspecific Taxon (subspecies, varieties, and other designations below the level of species)

Q – Questionable taxonomy that may reduce conservation priority

? – Inexact numeric rank

Appendix E

NWIC Results

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-000021	CA-SCL-000001	Resource Name - Castro-Ponce Mound; Other - Nelson's Map 356; Other - Stanford 1	Site	Prehistoric	AP09; AP15	1946 (Fenenga, [none]); 1980 (S. Kerr, [none]); 1984 ([none], Basin Research Associates, Inc.); 1987 (Barbara Bocek, Stanford University); 2010 (E,o;oe Ze;azp. Lau;a :ima Kesse <artomez. Kessoca Kpmes)	S-001784, S-004398, S-007483, S-008388, S-008389, S-008728, S-012528, S-016394, S-026045, S-048738, S-049780
P-43-000042	CA-SCL-000022	Resource Name - Little Castro	Site	Prehistoric	AP15	1912 (Loud); 1984; 2010 (Jesse Martinez, Steve Moore, PBS&J)	S-011396, S-012528, S-016394, S-026045, S-029657, S-048738, S-048931, S-054832
P-43-000043	CA-SCL-000023	Resource Name - Crittendon Mound; Other - NWIC File No. 6080-93-151	Site	Prehistoric	AP15; HP31	1912 (L.L. Loud, University of California); 1984; 1995 (Kathleen Kover, SAIC)	S-003146, S-008447, S-012528, S-015230, S-015758, S-016393, S-016394, S-017443, S-019881, S-026595, S-046899, S-048568, S-049247
P-43-000387	CA-SCL-000381H	Resource Name - Henry A Rengstorff House; OHP PRN - 4042-0001-0000; OHP PRN - NPS 78000778-0000; OHP PRN - SPHI-SCL-024; OHP Property Number - 005270; Other - 1737 Stierlin Rd; Other - 3070 N Shoreline Blvd.	Building	Historic	HP02	1972 (Pamela L. Freegot, City of Mountain View Planning Dept.); 1979 (J. Cooper, [none]); 1979 (Ken Alsman, Marlene Sarnat, Phyllis Butler, Emily Lyon, City of Mountain View, Shoreline Regional Park); 2008 (Christopher Canzonieri, Basin Research Associates)	S-004625, S-012528, S-016394, S-025173, S-046899, S-048931, S-051748
P-43-000418	CA-SCL-000413/H	Resource Name - Bert Gerow marking; Other - St. Athanasius Catholic Church	Site	Prehistoric, Historic	AP09; AP15	1979 (Cartier, Jewell, [none]); 1984 ([none], Basin Research Associates, Inc.)	S-012528, S-013200, S-016394, S-026045, S-048931

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-000441	CA-SCL-000439/H	Resource Name - DOT-04-SCL-101-1	Site	Prehistoric, Historic	AH01; AP01; AP15	1978 (C.S. Desgrandchamp, C.I. Sutton, [none]); 2007 (Michael Darcangelo, Far Western Anthropological Research Group, Inc.); 2008 (Christopher Canzonieri, Basin Research Associates); 2008 (Adrian Whitaker, Far Western Anthropological)	S-008345, S-012528, S-016394, S-029573, S-035123, S-037074, S-037075, S-043191, S-045670, S-046899, S-053868
P-43-000635	CA-SCL-000717	Resource Name - C-161; Other - Whisman School	Object, Site	Prehistoric	AP02; AP15	1991 (B. Bocek, Stanford University)	S-016394, S-028987
P-43-000669	CA-SCL-000707	Resource Name - Adobe/Alma; Other - C-160	Site	Prehistoric	AP11; AP15	1987 (Gerow, [none]); 1990 (Barb Bocek, Stanford University); 2010 (Jesse Martinez, PBS&J)	S-010077, S-026045, S-029657, S-048738
P-43-000707		Resource Name - 670 Willowgate Street; OHP Property Number - 072114; OHP PRN - DOE-43-91-0054-0000; OHP PRN - UMTA891122A	Building	Historic	HP02	1987 (Rebecca Loveland Anastasio, Basin Research Associates, Inc.); 1991 (Mark Brack, Archaeological/Historical Consultants)	S-009205, S-010154, S-012294
P-43-000708		Resource Name - City of Mountain View Adobe Building; National Register - NPS-02001256-0000; Resource Name - 157 Moffett Blvd; OHP PRN - Tax. Cert. 537.9-43-0027; OHP PRN - DOE-43-91-0056-0000; OHP PRN - UMTA891122A; OHP Property Number - 072116; Other - "La Casa de Monte Vista"	Building	Historic	AH15; HP44	1987 (Rebecca Loveland Anastasio, Basin Research Associates); 1991 (Mark Brack, Archaeological/Historical Consultants); 2000 (Tom Dufurrena, Page & Turnbull Architects); 2002 (Jessica E. Kusz, Page & Turnbull Inc., Architects)	S-009205, S-010154, S-012294
P-43-000709		Resource Name - "Safeguard Transmission Auto Repairs" property	Building	Historic	HP02	1987 (Rebecca Loveland Anastasio, Basin Research Associates, Inc.)	S-009205, S-025173

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-000710		Resource Name - 839 Washington Street; OHP Property Number - 072122; OHP PRN - DOE-43-91-0062-0000; OHP PRN - UMTA891122A	Building	Historic	HP03	1987 (Rebecca Loveland Anastasio, Basin Research Associates, Inc.); 1991 (Mark Brack, Archaeological/Historical Consultants)	S-009205, S-010154, S-012294
P-43-000711		Resource Name - 857 Washington Street; Other - 859 Washington St; OHP Property Number - 072123; OHP PRN - DOE-43-91-0063-0000; OHP PRN - UMTA891122A	Building	Historic	HP03	1987 (Rebecca Loveland Anastasio, Basin Research Associates, Inc.); 1991 (Mark Brack, Archaeological/Historical Consultants)	S-009205, S-010154, S-012294
P-43-000712		Resource Name - 891 Washington Street; Other - 981 Washington St; OHP Property Number - 072125; OHP PRN - DOE-43-91-0065-0000; OHP PRN - UMTA891122A	Building	Historic	HP02	1987 (Rebecca Loveland Anastasio, Basin Research Associates, Inc.); 1991 (Mark Brack, Archaeological/Historical Consultants)	S-009205, S-010154, S-012294
P-43-000713		Resource Name - 875 Washington Street; OHP Property Number - 072124; OHP PRN - UMTA891122A; OHP PRN - DOE-43-91-0064-0000	Building	Historic	HP02	1987 (Rebecca Loveland Anastasio, Basin Research Associates, Inc.); 1991 (Mark Brack, Archaeological/Historical Consultants)	S-009205, S-010154, S-012294
P-43-000714		Resource Name - 196 Elmwood Street; OHP Property Number - 072127; OHP PRN - UMTA891122A; OHP PRN - DOE-43-91-0067-0000	Building	Historic	HP02	1987 (Rebecca Loveland Anastasio, Basin Research Associates, Inc.); 1991 (Mark Brack, Archaeological/Historical Consultants)	S-009205, S-010154, S-012294
P-43-000715		Resource Name - 174, 176, 178 Elmwood Street; OHP Property Number - 072126; OHP PRN - UMTA891122A; OHP PRN - DOE-43-91-0066-0000	Building	Historic	HP03	1987 (Rebecca Loveland Anastasio, Basin Research Associates); 1991 (Mark Brack, Archaeological/Historical Consultants)	S-009205, S-010154, S-012294

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-000716		Resource Name - 925 Washington Street; OHP Property Number - 072128; OHP PRN - UMTA891122A; OHP PRN - DOE-43-91-0068-0000	Building	Historic	HP02	1987 (Rebecca Loveland Anastasio, Basin Research Associates, Inc.); 1991 (Mark Brack, Archaeological/Historical Consultants)	S-009205, S-010154, S-012294
P-43-000717		Resource Name - 933 Washington Street; OHP Property Number - 072129; OHP PRN - UMTA891122A; OHP PRN - DOE-43-91-0069-0000	Building	Historic	HP02	1987 (Rebecca Loveland Anastasio, Basin Research Associates, Inc.); 1991 (Mark Brack, Archaeological/Historical Consultants)	S-009205, S-010154, S-012294

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-000928	CA-SCL-000898H	Resource Name - Southern Pacific Railroad; OHP PRN - 4086-0209-9999; Other - SPRR / Coyote Creek Bridge near Wayne Station; OTIS Resource Number - 498387; Other - Hendy Iron Works Railroad Spur; Other - Passenger Rail Line; Other - UPRR; Other - Map Reference #01-08; Other - SPW-10; Other - SPW-11; Other - SPW-12; Other - SPW-13; Other - B-5/Bridge # 85.61; Other - Bridge # B-7; Caltrans Bridge # 86.20; Other - Corporal; southern Pacific Coast Division; Other - SPRR Bridge - San Francisquito Creek; Other - MP32.31; Bridge over Matadero Creek; Other - MP 32.76; Bridge over Barron Creek; Other - MP35.12; Bridge over Permanente Creek; Other - MP36.46: Stevens Creek Culvert; Other - MP 42.59, MP 56, MP56.50, MP 56.60, MP 56.70, MP 66.34, MP 66.42, MP 73, MP73.10, MP74.47, MP76.30; Other - Santa Clara County Concrete Headwall Culvers (caltrain) Mile Posts 42.59 - 76.30; Other - MP43.67; Lafayette Street Underpass; Other - MP 46.52; Taylor Street Underpass; Polhemus Street Underpass; Other - MP 47.15; Julian Street Underpass; Julian Street Subway;	Structure, Site	Historic	AH07; HP11; HP19; HP39	1990 (John Snyder, Caltrans); 1990 (John Snyder, Caltrans); 1990 (John Snyder, Caltrans); 1990 (John Snyder, Caltrans); 1994 (Glory Anne Laffey, Archives and Architecture); 1995; 1995; 1995; 1995; 1995; 1995; 1995; 1995; 1999 (J.Berg, S. Mikesell, Far Western); 2000 (Michael Corbett, Dames & Moore); 2000 (Theresa Rogers/Meta Bunse, JRP Historical Consulting Services); 2000 (Theresa Rogers/Meta Bunse, JRP Historical Consulting Services); 2000 (Theresa Rogers/Meta Bunse, JRP Historical Consulting Services); 2000 (Theresa Rogers/Meta Bunse, JRP Historical Consulting Services); 2000 (Bunse, McMorris, Rogers, JRP Historical Consulting Services); 2000 (Theresa Rogers/Meta Bunse, JRP Historical Consulting Services); 2000 (Theresa Rogers, Chris McMorris, JRP Historical Consulting Services); 2000 (Theresa Rogers, Meta Bunse, JRP Historical Consulting Services); 2001 (Theresa Rogers, JRP Historical Consulting Services); 2001 (Theresa Rogers, JRP Historical Consulting Services); 2002 (C. McMorris, A. Blosser, JRP Historical Consulting Services); 2008 (Denise Jurich, Jesse Martinez, PBS&J); 2012 (Sunshine Psota, Holman & Associates)	S-016192, S-017854, S-017993, S-021169, S-024592, S-029657, S-032512, S-033061, S-036873, S-038390, S-039032, S-043525, S-044036, S-048931, S-050985, S-051257, S-053364

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
		Other - Railroad 1; Other - SPRR Tres Pinos Branch					
P-43-001271		Resource Name - 902 Villa Street; Other - Pearson House	Building	Historic	HP02; HP04	2001 (Kara Mills Oosterhouse, Dill Design Group)	S-024558, S-024617
P-43-001435		Resource Name - Rogers Commercial Building; Other - 142-156 Castro Street	Building	Historic	HP05; HP06	2002 (Kara Oosterhous, Mary Jo Ignoffo, Dill Design Group)	S-025656, S-025657
P-43-001473		Resource Name - Moffett Blvd./Rt. 101 Interchange; Other - VTA Route 101/85 Interchange (North) Improvements Project	Site	Prehistoric, Historic	AP02	2000 (Mark Hylkema, Caltrans District 4)	S-024932, S-025529, S-043191, S-045670, S-046899
P-43-001476		Resource Name - 3000 Miramonte Avenue	Structure	Historic	HP22	2002 (Barbra Siskin, Jones & Stokes)	S-023899, S-025374
P-43-001514		Resource Name - House at 955 San Rafael Avenue; OTIS Resource Number - 570175; OHP Property Number - 128680; OHP PRN - DOE 43-01-0022-0000; OHP PRN - FHWA010404D; Other - Resource #45	Building	Historic	HP02	1999 (Gail F. Miller, Myra L. Frank & Associates, Inc.)	S-025529
P-43-001515		Resource Name - House at 943 San Rafael Avenue; OTIS Resource Number - 570174; OHP Property Number - 128279; OHP PRN - DOE 43-01-0021-0000; OHP PRN - FHWA010404D; Other - Resource #46	Building	Historic	HP02	1999 (Gail F. Miller, Myra L. Frank & Associates, Inc.)	S-025529
P-43-001516		Resource Name - House at 990 Terra Bella Avenue; OTIS Resource Number - 569083; OHP Property Number - 128692; OHP PRN - DOE 43-01-0033-0000; OHP PRN - FHWA010404D; Other - Resource #50	Building	Historic	HP02	1999 (Gail F. Miller, Myra L. Frank & Associates, Inc.)	S-025529

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-001517		Resource Name - House at 1020 Terra Bella Avenue; OTIS Resource Number - 569084; OHP Property Number - 128693; OHP PRN - DOE 43-01-0034-0000; Other - Resource #51; OHP PRN - FHWA010404D	Building	Historic	HP02	1999 (Gail F. Miller, Myra L. Frank & Associates, Inc.)	S-025529
P-43-001518		Resource Name - House at 1718 Spring Street; OHP PRN - DOE 43-01-0023-0000; Other - Resource #81; OHP PRN - FHWA010404D; OHP Property Number - 128682	Building	Historic	HP02	1999 (Gail F. Miller, Myra L. Frank & Associates, Inc.)	S-025529
P-43-001519		Resource Name - House at 1726 Spring Street; OHP PRN - DOE 43-01-0027-0000; Other - Resource #82; OHP PRN - FHWA010404D; OHP Property Number - 128686	Building	Historic	HP02	1999 (Gail F. Miller, Myra L. Frank & Associates, Inc.)	S-025529
P-43-001520		Resource Name - House at 1742 Spring Street; OHP PRN - DOE 43-01-0031-0000; Other - Resource #84; OHP PRN - FHWA010404D; OHP Property Number - 128690	Building	Historic	HP02	1999 (Gail F. Miller, Myra L. Frank & Associates, Inc.)	S-025529
P-43-001571		Resource Name - 2020 El Camino Real Mtn. View; Other - El Ramon Motel; Other - Vive Sol Restaurant; OHP Property Number - 143466; OTIS Resource Number - 554614; OHP PRN - DOE-43-03-0017-0000; OHP PRN - FCC030717C	Building	Historic	HP06	2003 (W. Collins & C. Losee, Archaeological Resources Technology)	S-027716

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-001572		Resource Name - 2026 El Camino Real Mtn. View; Other - Ron's Farmhouse; OHP Property Number - 143465; OTIS Resource Number - 554613; OHP PRN - DOE-43-03-0016-0000; OHP PRN - FCC030717C	Building	Historic	HP06	2003 (W. Collins & C. Losee, Archaeological Resources Technology)	S-027716
P-43-001579		Resource Name - House at 1734 Spring Street; OHP PRN - DOE 43-01-0024-0000; Other - Resource #83; OHP PRN - FHWA010404D; OHP Property Number - 128683	Building	Historic	HP02	1999 (Gail F. Miller, Myra L. Frank & Associates, Inc.)	S-025529
P-43-001580		Resource Name - House at 1758 Spring Street; OHP PRN - DOE 43-01-0025-0000; Other - Resource #86; OHP PRN - FHWA010404D; OHP Property Number - 128684	Building	Historic	HP02	1999 (Gail F. Miller, Myra L. Frank & Associates, Inc.)	S-025529
P-43-001581		Resource Name - House at 1782 Spring Street; OHP PRN - DOE 43-01-0026-0000; Other - Resource #89; OHP PRN - FHWA010404D; OHP Property Number - 128685	Building	Historic	HP02	1999 (Gail F. Miller, Myra L. Frank & Associates, Inc.)	S-025529
P-43-001582		Resource Name - House at 1750 Spring Street; OHP PRN - DOE 43-01-0028-0000; Other - Resource #85; OHP PRN - FHWA010404D; OHP Property Number - 128687	Building	Historic	HP02	1999 (Gail F. Miller, Myra L. Frank & Associates, Inc.)	S-025529

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-001583		Resource Name - House at 1790 Spring Street; OHP PRN - DOE 43-01-0029-0000; Other - Resource #90; OHP PRN - FHWA010404D; OHP Property Number - 128688	Building	Historic	HP02	1999 (Gail F. Miller, Myra L. Frank & Associates, Inc.)	S-025529
P-43-001584		Resource Name - House at 1798 Spring Street; OHP PRN - DOE 43-01-0030-0000; Other - Resource #91; OHP PRN - FHWA010404D; OHP Property Number - 128689	Building	Historic	HP02	1999 (Gail F. Miller, Myra L. Frank & Associates, Inc.)	S-025529
P-43-001585		Resource Name - House at 1774 Spring Street; OHP PRN - DOE 43-01-0032-0000; Other - Resource #88; OHP PRN - FHWA010404D; OHP Property Number - 128691	Building	Historic	HP02	1999 (Gail F. Miller, Myra L. Frank & Associates, Inc.)	S-025529
P-43-001815		Resource Name - Odd Fellows Lodge; Other - 823 Villa St / 206 Castro; OHP Property Number - 135347; OHP PRN - FCC060913A	Building	Historic	HP06; HP13	2006 (Dana E. Supernowicz, Historic Resource Associates)	S-032242
P-43-001836		Resource Name - Jones Hall, USAR Center; Other - Mountain View USAR Center, Facility ID No. CA031	Building	Historic	HP34	2006 ([none], PAR Environmental Services, Inc.)	S-033596, S-044017
P-43-001846		Resource Name - Wagon Wheel Restaurant	Building	Historic	HP06	2000 (Ward Hill, [none])	S-024973
P-43-001848		Resource Name - # 1; Resource Name - 1925 Hackett Ave	Building	Historic	HP03	2005 (Brad Brewster, Environmental Science Assoc.)	S-033426
P-43-001849		Resource Name - # 2; Resource Name - 1930 Hackett Ave	Building	Historic	HP02	2005 (Brad Brewster, Environmental Science Assoc.)	S-033426
P-43-001850		Resource Name - # 3; Resource Name - 1936 Hackett Ave	Building	Historic	HP02	2005 (Brad Brewster, Environmental Science Assoc.)	S-033426

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-001851		Resource Name - # 4; Resource Name - 1950 Hackett	Building	Historic	HP02	2005 (Brad Brewster, Environmental Science Asso.)	S-033426
P-43-001852		Resource Name - # 5; Resource Name - 1966 Hackett Ave	Building	Historic	HP03	2005 (Brad Brewster, Environmental Science Assoc.)	S-033426
P-43-001853		Resource Name - # 6; Resource Name - 1968 Hackett Ave	Building	Historic	HP03	2005 (Brad Brewster, Environmental Science Assoc.)	S-033426
P-43-001854		Resource Name - # 7; Resource Name - 83 Sierra Vista Ave	Building	Historic	HP02	2005 (Brad Brewster, Environmental Science Assoc.)	S-033426
P-43-001855		Resource Name - # 8; Resource Name - 91-93 Sierra Vista Ave	Building	Historic	HP03	2005 (Brad Brewster, Environmental Science Assoc.)	S-033426
P-43-001856		Resource Name - # 9; Resource Name - 95-97 Sierra Vista Ave	Building	Historic	HP03	2005 (Brad Brewster, Environmental Science Assoc.)	S-033426
P-43-001857		Resource Name - #10; Resource Name - 113 Sierra Vista Ave	Building	Historic	HP03	2005 (Brad Brewster, Environmental Science Assoc.)	S-033426
P-43-001858		Resource Name - # 11; Resource Name - 124-128 Sierra Vista Ave	Building	Historic	HP03	2005 (Brad Brewster, Environmental Science Assoc.)	S-033426
P-43-001859		Resource Name - # 12; Resource Name - 156 Sierra Vista Ave	Building	Historic	HP03	2005 (Brad Brewster, Environmental Science Associates)	S-033426
P-43-001860		Resource Name - # 13; Resource Name - 165 Sierra Vista Ave	Building	Historic	HP03	2005 (Brad Brewster, Environmental Science Associates)	S-033426
P-43-001861		Resource Name - # 14; Resource Name - 173 Sierra Vista Ave	Building	Historic	HP03	2005 (Brad Brewster, Environmental Science Associates)	S-033426
P-43-001862		Resource Name - # 15; Resource Name - 197 Sierra Vista Ave	Building	Historic	HP02	2005 (Brad Brewster, Environmental Science Associates)	S-033426
P-43-001863		Resource Name - # 16; Resource Name - 204 Sierra Vista Ave	Building	Historic	HP02	2005 (Brad Brewster, Environmental Science Associates)	S-033426

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-001864		Resource Name - # 17; Resource Name - 207 Sierra Vista Ave / 124 Hackett Ave	Building	Historic	HP02	2005 (Brad Brewster, Environmental Science Associates)	S-033426
P-43-001865		Resource Name - # 18; Resource Name - 200 Montebello Ave	Building	Historic	HP03	2005 (Brad Brewster, Enviromental Science Associates)	S-033426
P-43-001866		Resource Name - # 19; Resource Name - 111 N. Rengstorff Ave	Building	Historic	HP03	2005 (Brad Brewster, Environmental Science Associates)	S-033426
P-43-002247		Resource Name - Flood Control Structure - West Edge on Pond A1 (Reach A)	Structure	Historic	AH06; HP11	2008 (Christopher Canzonieri, Basin Research Associates, Inc.)	S-046899
P-43-002703		Resource Name - 1581-1585 West El Camino Real; Other - APN: 189-32-075	Building	Historic	HP03; HP06	2012 (Chandra Miller, Leslie Trew, JRP)	S-039471
P-43-002710		Resource Name - Henry and Mary Bar House and Ranch	Building	Historic	HP33	2012 (F. Maggi, S. Winder, Archives & Architecture, LLC)	S-039548
P-43-002823		Resource Name - Alviso Salt Works Historic Landscape; Other - Alviso or Schillling Arden Salt Company; Other - Alviso Salt Works; OHP PRN - FWS 040721A	District	Historic	AH16	2007 (Lou Ann Speulda-Drews, Nick Valentine, Ellen Joslin Johnck, US Fish & Wildlife Service); 2018 (Kathleen Ungvarsky, USACOE)	S-042003, S-043585, S-045701
P-43-003046		Resource Name - Mountain View and Los Altos PG&E Utility Poles; Other - PG&E Utility Poles (Nodes 305A, 313A, 316A, 322A, 325B, 329B, 331A, 340A and 341A); OHP Property Number - 183016; OHP PRN - FCC 110510 B-K	Structure	Historic	HP11	2011 (Dana E. Supernowicz, Historic Resource Associates)	S-043759

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-003123		OTIS Resource Number - 513847; OHP PRN - FHWA880331B; OHP PRN - DOE-43-88-0010-0000; OHP PRN - DOE-43-01-0020-0000; OHP PRN - FHWA010404D; Resource Name - Gabler Residence; OHP Property Number - 116100	Building	Historic	HP02	1987 (Aaron A. Gallup, Caltrans)	S-025529
P-43-003124		Resource Name - 950 San Leandro; OHP Property Number - 513841; OHP PRN - DOE-43-01-0019-0000; OHP PRN - FHWA010404D; OHP PRN - DOE-43-88-0006-0000; OHP PRN - FHWA8800331B; OHP Property Number - 116093	Building	Historic	HP02	1987 (Aaron A. Gallup, Caltrans)	S-025529
P-43-003148		Resource Name - 1015 N. Shoreline Boulevard; Other - 1015 Stierlin Road	Building	Historic	HP02	2014 (Brad Brewster,, Environmental Science Associates)	S-045758
P-43-003149		Resource Name - 1062 Linda Vista Avenue	Building	Historic	HP06	2014 (Brad Brewster, Environmental Science Associates)	S-045758, S-053473
P-43-003150		Resource Name - 1150 Terra Bella Avenue	Building	Historic	HP02	2014 (Brad Brewster, Environmental Science Associates)	S-045758, S-053473
P-43-003151		Resource Name - 1160 Terra Bella Avenue	Building	Historic	HP06	2014 (Brad Brewster, Environmental Science Associates)	S-045758
P-43-003152		Resource Name - 1040 Grant Road, Mountain View; Other - Grant Road Shopping Center; OHP PRN - FCC20141013003	Building	Historic	HP06	2014 (Alexandra Bevk, Archaeological Resources Technology)	S-045756
P-43-003172		Resource Name - [none]	Site	Prehistoric, Historic	AH16; AP15	2010 (Emilie Zelazo, Kayla Luna, Jesse Martinez, Jessica Jones, PBS&J)	S-048738, S-048931, S-054832
P-43-003180		Resource Name - 711 Church Street	Site	Prehistoric	AP01	2015 (Michelle Touton Staley, Bayshore Archaeology)	S-047006

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-003443		Other - 102 Castro St.; OHP Property Number - 072119; OHP PRN - DOE-43-91-0059-0000; OHP PRN - UMTA891122A; Resource Name - Hot Palace Restaurant; Other - United States Post Office	Building	Historic	HP06	1991 (Mark Brack, Archaeological/Historical Consultants)	S-012294
P-43-003461		Resource Name - 145 Santa Rosa St.; OHP Property Number - 072115; OHP PRN - DOE-43-91-0055-0000; OHP PRN - UMTA891122A	Building	Historic	HP02	1991 (Mark Brack, Archaeological/Historical Consultants)	S-012294
P-43-003488		Resource Name - 310 E. Evelyn Ave.; OHP Property Number - 072113; OHP PRN - DOE-43-91-0053-0000; OHP PRN - UMTA891122A; Other - Desk Depot; Other - O-My Food Products	Building	Historic	HP08	1991 (Mark Brack, Archaeological/Historical Consultants)	S-012294
P-43-003497		Resource Name - 599 W. Evelyn Ave.; Other - Milton Lumber Company; OHP Property Number - 072117; OHP PRN - DOE-43-91-0057-0000; OHP PRN - UMTA891122A	Building	Historic	HP08	1991 (Mark Brack, Archaeological/Historical Consultants)	S-012294
P-43-003498		Resource Name - 727-733 W. Evelyn Ave.; OHP Property Number - 072118; OHP PRN - DOE-43-91-0058-0000; OHP PRN - UMTA891122A; Other - Depot Garage / Service Laundry; Other - Chabot Garage / Service Laundry	Building	Historic	HP06	1991 (Mark Brack, Archaeological/Historical Consultants)	S-012294

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-003500		Resource Name - 82 Pioneer Way; OHP Property Number - 072112; OHP PRN - DOE-43-91-0071-0000; OHP PRN - UMTA891122A	Building	Historic	HP02	1991 (Mark Brack, Archaeological/Historical Consultants)	S-012294
P-43-003501		Resource Name - 867 W. Evelyn Ave.; OHP Property Number - 072120; OHP PRN - DOE-43-91-0060-0000; OHP PRN - UMTA891122A; Other - DJ's Pizza	Building	Historic	HP06	1991 (Mark Brack, Archaeological/Historical Consultants)	S-012294
P-43-003502		Resource Name - 907 W. Evelyn Ave.; OHP Property Number - 072121; OHP PRN - DOE-43-91-0061-0000; OHP PRN - UMTA891122A	Building	Historic	HP02	1991 (Mark Brack, Archaeological/Historical Consultants)	S-012294
P-43-003503		Resource Name - Castro St. / Downtown Mountain View	Building, District	Historic	HP06; HP08	1991 (Mark Brack, Archaeological/Historical Consultants)	S-012294, S-048931
P-43-003530		Resource Name - C-1512; Voided - C-1512	Site	Prehistoric	AP01	1977 (Robert Cartier, [none]); 2008 (Christopher Canzonieri, Basin Research Associates)	S-008509, S-046899
P-43-003655		Resource Name - Heidel's Bier-garten; Other - John Pearson House; Other - 787 (formerly 849) Mt. View-Alviso Road; OHP Property Number - 066556; OHP PRN - DOE-43-88-0002-0000; OHP PRN - FHWA880331B	Building	Historic	HP02; HP04; HP06	1987 (Aaron A. Gallup, Caltrans)	S-054442
P-43-003656		Resource Name - 555 Mountain View-Alviso Road (Highway 237); OHP Property Number - 116089; OHP PRN - DOE-43-88-0003-0000; OHP PRN - FHWA880331B	Building	Historic	HP02	1987 (Aaron A. Gallup, Caltrans)	S-054442

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-003657		Resource Name - Gilbert Chance House; Other - Henry Elmore Residence; Other - 553 Mountain View-Alviso Road (Highway 237); OHP Property Number - 066553; OHP PRN - DOE-43-88-0001-0000; OHP PRN - FHWA880331B	Building	Historic	HP33	1987 (Aaron A. Gallup, Caltrans)	S-054442
P-43-003658		Resource Name - Pagani Barn and Tank House; Other - 450-454 Ferguson (formerly Highway 237); OHP Property Number - 116091; OHP PRN - DOE-43-88-0004-0000; OHP PRN - FHWA880331B	Building	Historic	HP03; HP04	1987 (Aaron A. Gallup, Caltrans)	
P-43-003659		Resource Name - 1731 Plymouth; OHP Property Number - 116092; OHP PRN - DOE-43-88-0005-0000; OHP PRN - FHWA880331B	Building	Historic	HP02	1987 (Aaron A. Gallup, Caltrans)	
P-43-003711		Resource Name - 104 College Avenue; Other - 16113	Building	Historic	HP02	2010 (James Williams, PBS&J)	S-048738
P-43-003713		Resource Name - 1069 A and B Jackson Street; Other - 16125	Building	Historic	HP03	2010 (James Williams, Amber Grady, PBS&J)	S-048738
P-43-003714		Resource Name - 1081 Jackson Street; Other - 16123	Building	Historic	HP02	2010 (Amber Grady, PBS&J)	S-048738
P-43-003715		Resource Name - 262 South Shoreline Blvd; Other - 16163	Building	Historic	HP03	2010 (Amber Grady, PBS&J)	S-048738
P-43-003732		Resource Name - T-Mobile West, LLC Candidate SF70111M (Church Street); Other - PG&E Lattice Tower	Structure	Historic	HP11	2016 (K.A. Crawford, Crawford Historic Services)	S-048394
P-43-003735		Resource Name - 1019 Mountain View Avenue	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-003736		Resource Name - 1120 Miramonte Avenue	Building	Historic	HP15	2012 (Aisha Fike, ICF International)	S-048393
P-43-003737		Resource Name - 1236 Marilyn Drive	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003738		Resource Name - 1250 Marilyn Drive	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003739		Resource Name - 1264 Marilyn Drive	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003740		Resource Name - 1267 Marilyn Drive	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003741		Resource Name - 1300 Ernestine Lane	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003742		Resource Name - 1302 Marilyn Drive	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003743		Resource Name - 1311 Marilyn Place	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003744		Resource Name - 1314 Loyd Way	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003745		Resource Name - 1325 Marilyn Place	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003747		Resource Name - 1425 South Springer Road; Other - T-Mobile West, LLC Candidate SF04357A (Seventh Day); Other - Mountain View Central 7th Day Adventist Church	Building	Historic	HP16	2012 (Aisha Fike, ICF International); 2016 (K. A. Crawford, Crawford Historic Services)	S-048393, S-052052
P-43-003748		Resource Name - 151 Mountain View Avenue	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003749		Resource Name - 1603 South Springer Road	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003750		Resource Name - 1619 South Springer Road	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003751		Resource Name - 207 Mountain View Avenue	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003759		Resource Name - 748 Arroyo Road	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-003760		Resource Name - 766 Arroyo Road	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003768		Resource Name - 795 Sunshine Drive	Building	Historic	HP02	2012 (Aisha Fike, ICF International)	S-048393
P-43-003776		Resource Name - 91 Mountain View Avenue	Building	Historic	HP02	2012 (Aisha Fike); 2012 (Aisha Fike, ICF International)	S-048393
P-43-003777		Resource Name - 924 Mountain View Avenue	Building	Historic	HP03	2012 (Aisha Fike, ICF International)	S-048393
P-43-003778		Resource Name - 935 Mountain View Avenue	Building	Historic	HP03	2012 (Aisha Fike, ICF International)	S-048393
P-43-003779		Resource Name - Hale Creek Box Culvert	Structure	Historic	HP39	2012 (Aisha Fike, ICF International)	S-048393
P-43-003780		Resource Name - Permanente Creek Box Culvert	Structure	Historic	HP11	2012 (Aisha Fike, ICF International)	S-048393
P-43-003943		Resource Name - 394 Ortega Avenue	Building	Historic	HP02; HP04	2016 (Neal Kaptain, Angelique Theriot, LSA Associates, Inc.)	S-050376
P-43-003985		Resource Name - 1696 Villa Street	Building	Historic	HP02; HP04	2017 (Steven Treffers and Rachel Perzel, Rincon Consultants, Inc.)	S-051917
P-43-003986		Resource Name - 1698 Villa Street	Building	Historic	HP02; HP04	2017 (Steven Treffers, Rachel Perzel, Rincon Consultants, Inc.)	S-051917
P-43-003987		Resource Name - 1700 Villa Street	Building	Historic	HP02; HP04	2017 (Steven Treffers, Rachel Perzel, Rincon Consultants, Inc.)	S-051917
P-43-003988		Resource Name - 1734 (1722-1756) Villa Street	Building	Historic	HP02	2017 (Steven Treffers, Rachel Perzel, Rincon Consultants, Inc.)	S-051917
P-43-004015		Resource Name - T-Mobile West, LLC Candidate SF04617A (Sunny Golf Course)	Building	Historic	HP06	2015 (K. A. Crawford, Crawford Historic Services)	S-052063
P-43-004019		Resource Name - T-Mobile West, LLC Candidate SF04970A (San Jose Mercury Bldg.)	Building	Historic	HP07	2016 (K. A. Crawford, Crawford Historic Services)	S-052068
P-43-004035		Resource Name - 186 East Middlefield Road	Building	Historic	HP03	2016 (Kara Brunzell, Brunzell Historical)	S-053182
P-43-004038		Resource Name - 1209 Villa Street	Building	Historic	HP02	2018 (Ruchira Nageswaran, Knapp Architects)	S-053281

Appendix F

CalEEMod Results

R3 Rezone Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	R3 Rezone
Operational Year	2050
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	32.8
Location	37.39979759538949, -122.08490513571226
County	Santa Clara
City	Mountain View
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1730
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.30

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Condo/Townhouse	16,000	Dwelling Unit	1,000	16,960,000	0.00	—	32,000	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Unmit.	5,377	1,003,751	1,009,129	582	25.2	186	1,031,361
Daily, Winter (Max)	—	—	—	—	—	—	—
Unmit.	5,377	963,861	969,238	584	27.3	123	992,081
Average Daily (Max)	—	—	—	—	—	—	—
Unmit.	5,377	714,217	719,594	577	23.7	147	741,240
Annual (Max)	—	—	—	—	—	—	—
Unmit.	890	118,247	119,137	95.5	3.93	24.3	122,721

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Mobile	—	610,694	610,694	17.8	21.0	65.0	617,461
Area	0.00	202,879	202,879	3.88	0.40	—	203,094
Energy	—	188,078	188,078	19.4	1.03	—	188,872
Water	1,112	2,100	3,212	114	2.75	—	6,890
Waste	4,265	0.00	4,265	426	0.00	—	14,922
Refrig.	—	—	—	—	—	121	121
Total	5,377	1,003,751	1,009,129	582	25.2	186	1,031,361

Daily, Winter (Max)	—	—	—	—	—	—	—
Mobile	—	573,231	573,231	19.7	23.1	1.69	580,616
Area	0.00	200,452	200,452	3.77	0.38	—	200,659
Energy	—	188,078	188,078	19.4	1.03	—	188,872
Water	1,112	2,100	3,212	114	2.75	—	6,890
Waste	4,265	0.00	4,265	426	0.00	—	14,922
Refrig.	—	—	—	—	—	121	121
Total	5,377	963,861	969,238	584	27.3	123	992,081
Average Daily	—	—	—	—	—	—	—
Mobile	—	517,900	517,900	16.9	19.9	25.1	524,285
Area	0.00	6,140	6,140	0.14	0.02	—	6,149
Energy	—	188,078	188,078	19.4	1.03	—	188,872
Water	1,112	2,100	3,212	114	2.75	—	6,890
Waste	4,265	0.00	4,265	426	0.00	—	14,922
Refrig.	—	—	—	—	—	121	121
Total	5,377	714,217	719,594	577	23.7	147	741,240
Annual	—	—	—	—	—	—	—
Mobile	—	85,744	85,744	2.80	3.30	4.16	86,801
Area	0.00	1,016	1,016	0.02	< 0.005	—	1,018
Energy	—	31,138	31,138	3.22	0.17	—	31,270
Water	184	348	532	18.9	0.46	—	1,141
Waste	706	0.00	706	70.6	0.00	—	2,471
Refrig.	—	—	—	—	—	20.1	20.1
Total	890	118,247	119,137	95.5	3.93	24.3	122,721

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Condo/Townhouse	—	610,694	610,694	17.8	21.0	65.0	617,461
Total	—	610,694	610,694	17.8	21.0	65.0	617,461
Daily, Winter (Max)	—	—	—	—	—	—	—
Condo/Townhouse	—	573,231	573,231	19.7	23.1	1.69	580,616
Total	—	573,231	573,231	19.7	23.1	1.69	580,616
Annual	—	—	—	—	—	—	—
Condo/Townhouse	—	85,744	85,744	2.80	3.30	4.16	86,801
Total	—	85,744	85,744	2.80	3.30	4.16	86,801

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Condo/Townhouse	—	38,221	38,221	6.18	0.75	—	38,599
Total	—	38,221	38,221	6.18	0.75	—	38,599
Daily, Winter (Max)	—	—	—	—	—	—	—
Condo/Townhouse	—	38,221	38,221	6.18	0.75	—	38,599
Total	—	38,221	38,221	6.18	0.75	—	38,599
Annual	—	—	—	—	—	—	—
Condo/Townhouse	—	6,328	6,328	1.02	0.12	—	6,391
Total	—	6,328	6,328	1.02	0.12	—	6,391

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Condo/Townhouse	—	149,857	149,857	13.3	0.28	—	150,272
Total	—	149,857	149,857	13.3	0.28	—	150,272
Daily, Winter (Max)	—	—	—	—	—	—	—
Condo/Townhouse	—	149,857	149,857	13.3	0.28	—	150,272
Total	—	149,857	149,857	13.3	0.28	—	150,272
Annual	—	—	—	—	—	—	—
Condo/Townhouse	—	24,811	24,811	2.20	0.05	—	24,879
Total	—	24,811	24,811	2.20	0.05	—	24,879

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Hearths	0.00	200,452	200,452	3.77	0.38	—	200,659
Consumer Products	—	—	—	—	—	—	—
Architectural Coatings	—	—	—	—	—	—	—
Landscape Equipment	—	2,427	2,427	0.10	0.02	—	2,436
Total	0.00	202,879	202,879	3.88	0.40	—	203,094
Daily, Winter (Max)	—	—	—	—	—	—	—
Hearths	0.00	200,452	200,452	3.77	0.38	—	200,659
Consumer Products	—	—	—	—	—	—	—
Architectural Coatings	—	—	—	—	—	—	—

Total	0.00	200,452	200,452	3.77	0.38	—	200,659
Annual	—	—	—	—	—	—	—
Hearths	0.00	818	818	0.02	< 0.005	—	819
Consumer Products	—	—	—	—	—	—	—
Architectural Coatings	—	—	—	—	—	—	—
Landscape Equipment	—	198	198	0.01	< 0.005	—	199
Total	0.00	1,016	1,016	0.02	< 0.005	—	1,018

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Condo/Townhouse	1,112	2,100	3,212	114	2.75	—	6,890
Total	1,112	2,100	3,212	114	2.75	—	6,890
Daily, Winter (Max)	—	—	—	—	—	—	—
Condo/Townhouse	1,112	2,100	3,212	114	2.75	—	6,890
Total	1,112	2,100	3,212	114	2.75	—	6,890
Annual	—	—	—	—	—	—	—
Condo/Townhouse	184	348	532	18.9	0.46	—	1,141
Total	184	348	532	18.9	0.46	—	1,141

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—
Condo/Townhouse	4,265	0.00	4,265	426	0.00	—	14,922
Total	4,265	0.00	4,265	426	0.00	—	14,922
Daily, Winter (Max)	—	—	—	—	—	—	—
Condo/Townhouse	4,265	0.00	4,265	426	0.00	—	14,922
Total	4,265	0.00	4,265	426	0.00	—	14,922
Annual	—	—	—	—	—	—	—
Condo/Townhouse	706	0.00	706	70.6	0.00	—	2,471
Total	706	0.00	706	70.6	0.00	—	2,471

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	121	121
Total	—	—	—	—	—	121	121
Daily, Winter (Max)	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	121	121
Total	—	—	—	—	—	121	121
Annual	—	—	—	—	—	—	—
Condo/Townhouse	—	—	—	—	—	20.1	20.1
Total	—	—	—	—	—	20.1	20.1

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Condo/Townhouse	117,120	130,240	100,480	42,565,258	886,915	986,269	760,906	322,334,182

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Condo/Townhouse	—
Wood Fireplaces	0
Gas Fireplaces	8160
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	7840
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
34344000	11,448,000	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Condo/Townhouse	68,391,837	204	0.0330	0.0040	467,593,421

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Condo/Townhouse	580,262,400	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Condo/Townhouse	7,914	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Condo/Townhouse	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Condo/Townhouse	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	12.7	annual days of extreme heat
Extreme Precipitation	4.40	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	8.55	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	1	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	1	1	1	2
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	13.6
AQ-PM	18.6
AQ-DPM	74.7
Drinking Water	49.5
Lead Risk Housing	30.9
Pesticides	0.00
Toxic Releases	29.9
Traffic	87.9
Effect Indicators	—
CleanUp Sites	98.0
Groundwater	97.7
Haz Waste Facilities/Generators	63.9
Impaired Water Bodies	51.2
Solid Waste	0.00
Sensitive Population	—
Asthma	9.04

Cardio-vascular	19.2
Low Birth Weights	89.0
Socioeconomic Factor Indicators	—
Education	38.9
Housing	14.2
Linguistic	74.1
Poverty	19.1
Unemployment	30.9

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	83.84447581
Employed	96.63800847
Median HI	91.99281406
Education	—
Bachelor's or higher	90.85076351
High school enrollment	100
Preschool enrollment	84.67855768
Transportation	—
Auto Access	54.54895419
Active commuting	74.15629411
Social	—
2-parent households	42.53817529
Voting	91.13306814
Neighborhood	—
Alcohol availability	82.7665854

Park access	38.34210189
Retail density	78.71166431
Supermarket access	79.96920313
Tree canopy	80.12318748
Housing	—
Homeownership	38.3036058
Housing habitability	79.37892981
Low-inc homeowner severe housing cost burden	70.4478378
Low-inc renter severe housing cost burden	84.43474913
Uncrowded housing	79.21211344
Health Outcomes	—
Insured adults	82.56127294
Arthritis	82.7
Asthma ER Admissions	90.2
High Blood Pressure	68.0
Cancer (excluding skin)	38.7
Asthma	94.4
Coronary Heart Disease	83.6
Chronic Obstructive Pulmonary Disease	93.7
Diagnosed Diabetes	86.4
Life Expectancy at Birth	57.7
Cognitively Disabled	62.4
Physically Disabled	55.6
Heart Attack ER Admissions	66.9
Mental Health Not Good	95.0
Chronic Kidney Disease	85.5
Obesity	89.8
Pedestrian Injuries	53.1

Physical Health Not Good	95.1
Stroke	88.3
Health Risk Behaviors	—
Binge Drinking	47.1
Current Smoker	94.5
No Leisure Time for Physical Activity	89.3
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	62.5
Elderly	29.9
English Speaking	26.8
Foreign-born	80.0
Outdoor Workers	84.8
Climate Change Adaptive Capacity	—
Impervious Surface Cover	47.3
Traffic Density	78.7
Traffic Access	53.7
Other Indices	—
Hardship	6.3
Other Decision Support	—
2016 Voting	89.2

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	42.0
Healthy Places Index Score for Project Location (b)	95.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No

Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	16,000 units and 32,000 persons upon full buildout (2050) per Project Description. Modeled as Condo/Townhouse. Default VMT.
Operations: Hearths	—

Appendix G

Utility Impact Study prepared by Schaaf & Wheeler

SCHAAF & WHEELER
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MEMORANDUM



May 2, 2026
To: Cecillia Kim, PhD (Opticos Design, Inc)
From: Leif M. Coponen, PE; Brett F. Crews, PE
Subject: R3 Zoning District Update – Utility Impact Study
Job #: OPTI.01.25

Executive Summary

Opticos Design Inc. (Opticos) has retained Schaaf & Wheeler to determine impacts from the R3 Zoning District Update (Project) on the City of Mountain View's (City) potable water and sanitary sewer systems. This memorandum and its findings will be used to assist Opticos and the City with planning efforts. The Project proposes revisions to the City's R3 Zone standards to increase residential density within designated "change areas" through new zoning subdistricts and updated development standards. At full buildout, the Project anticipates new development up to 16,000 total dwelling units. The Project site covers 1,260 acres and includes about 8,350 parcels throughout the City. Figure 1 presents the Project parcels and highlights the subset of parcels evaluated for Project-related impacts under this study.

This memo is intended as a confirmation of existing studies and does not include a detailed impact study. The incremental difference in potable water demand and sanitary sewer flow is estimated for the proposed Project development, and the impact of these incremental differences on the utility systems is evaluated under the following planning conditions:

- The **Existing Condition** represents the City's current utility infrastructure and current land use throughout the City.
- The **Near-Term Future Condition** represents future planned infrastructure and planned land use and growth and is consistent with the City's utility system master planning horizon of 2030. These conditions are evaluated to assess potential hydraulic conveyance impacts associated with the Project. Utility systems modeling beyond this time horizon would be highly speculative, because it would be dependent on specific development densities and distribution.
- The **Long-Term Future Condition** represents the City's projected year 2045 build-out scenario and is evaluated to determine whether City water supply capacity and sewage treatment capacity are adequate to support total new development.

Previous technical studies encompassing the Project area include the 2022 Water Master Plan (WMP), 2022 Sewer Master Plan (SMP), and the 2020 Urban Water Management Plan (UWMP). Projected potable water demand and sanitary sewer flow generation for the proposed multi-family residential Projects are based on updated unit duty factors determined as part of the

North Bayshore Precise Plan Phase II (NBPPPII) Utility Impact Study (Schaaf & Wheeler, October 2016).

Based on the findings of this study, the Project does contribute to additional deficiencies in the water system. The proposed Project increases the total base water demand for the site by 800,000 gpd under Near-Term Future modeled conditions. The water system is sufficient to maintain minimum pressures under peak hour demand (PHD) with and without the Project demand in the Near-Term Future Conditions. There are several fire flow deficiencies in the Near-Term Future Conditions in Pressure Zones 1 and 2; however, the Project does not impact the majority of the available fire flows. The Project demands do have an impact on the available flows at two deficient locations. Other than these two locations, the City's water system is sufficient to support Near-Term Future demands and required fire flows at the Project sites. This study recommends one new Project-specific water system CIP in the San Antonio Center area to mitigate deficient fire flows along Monroe Drive and is triggered by redevelopment of existing single-family home parcels with new multi-family residential developments.

Based on the findings and recommendations of the previous technical studies, the Project does not create additional deficiencies in the sewer system. The proposed Project increases the total base sewer generation for all modified parcels by 600,000 gpd under Near-Term Future modeled conditions. Surcharging in the downstream system is identified with and without the Project flow in both Existing and Near-Term Future Conditions; however, no deficiencies are identified, as all surcharged pipes meet the freeboard criteria set by the 2022 SMP. There are two CIPs in the 2022 SMP that outline condition-related improvements near the Shoreline Pump Station and forcemain along the Project flow path. The increased Project sewer flows do not trigger the need for previously identified or new CIPs.

Under the Long-Term Future Cumulative Condition (planning year 2045), the City has adequate water supply and wastewater treatment capacity to serve projected demands under both pre- and post-project conditions. Based on the 2020 UWMP, the City's maximum water supply is up to 18.26 mgd during normal years and 11.53 mgd during multiple dry years, both of which are adequate to supply total projected City water demands with the Project for the respective water year types. Projected City wastewater flows under the 2045 Long-Term Future Cumulative Condition also remain within Mountain View's RWQCP Average Annual Flow (AAF) allocated treatment capacity of 15.1 MGD under both pre- and post-Project conditions.

Introduction

The Project proposes the introduction of new City R3 Zoning District standards leading to an increase in multi-family residential densities (dwelling units per acre) within designated "change areas" spread across the City. At full buildout, the Project anticipates the addition of up to 16,000 new dwelling units (DUs). Each subdistrict establishes its own maximum density, expressed as DUs per acre.

Upon initial evaluation, it was identified that applying the Project's proposed maximum densities for each subdistrict results in a total buildout that substantially exceeds the maximum projected development of 16,000 DUs. To align with the intended full-buildout projection, Project impacts are evaluated under the assumption that the 16,000-unit increase is allocated across only the higher-density multi-family residential proposed subdistricts using a scaled density factor. This methodology provides a conservative estimate of potential increases in system demand while maintaining a representative spread across the Project's core development areas. Figure 1 outlines the parcels used as a basis of the densification in residential units across the City.

This study estimates the incremental difference in water demand and sewer flow resulting from Project development and evaluates impacts compared to previous study findings. The incremental difference is added to the City's existing models for Existing and Near-Term Future Conditions. The Existing and Near-Term Future Conditions use the City's models developed as part of the 2022 WMP and SMP. The Near-Term Future Condition model demands are consistent with City-wide growth projections from the 2020 Urban Water Management Plan (UWMP) for the planning horizon year 2030. The City's total water supply and sewer treatment capacity is analyzed for the planning horizon year 2045 based on the 2020 UWMP projected water demands.

Overview of Scenarios

The Project's affected parcels currently contain approximately 9,000 single family and multi-family dwelling units, plus additional existing land uses. Redevelopment of vacant and under-utilized sites in the affected parcels could result in approximately 1,000 additional units with no change to the existing zoning (the "No Project" scenario).

While long-term Project growth is estimated from the maximum number of multi-family dwelling units projected at full buildout, as identified in the Project Notice of Preparation of a Draft Environmental Impact Report (EIR) dated July 2025, 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 and sanitary sewer systems, 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. The long-term scenario adds approximately 16,000 multi-family units to the existing conditions. These are summarized in Table 1.

Table 1: 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 System Impact

Near-Term Project Contribution

The Project sites' potable water demand is served by various City water mains, primarily in Pressure Zone 1 and Zone 2.

Existing average daily demand (ADD) of water attributable to the Project parcels is approximately 800,000 gallons per day (GPD). The no-project scenario adds approximately 100,000 GPD and the Near-Term Future scenario adds approximately 700,000 GPD. The ADD is an estimated average daily demand based on totalized annual water use. Table 2 shows the Project demand estimation using the multi-family residential water unit duty factor from Table 2-2 in the NBPPPII UIS.

Table 2: Project Estimated Water Demand

Scenario	Individual Use	Units	Generation Factor (gpd/DU)	Water Demand (gpd)
Existing	Varies	9,000	varies	800,000
No Project (Near-Term)	MFR	1,000 over Existing	100	100,000
Near-Term R3 Zoning District Update	MFR	7,000 over No Project	100	700,000
			Total	**1,600,000**

Near-Term Fire Flow Requirement

The post-Project planning-level fire flow is 2,500 gpm outlined in Table 7-2 of the 2022 WMP for Multi-Family Residential land use. Fire Flow Requirements are only updated if required fire flows in the model are less than the post-Project planning-level fire flows. If required fire flows are greater than the post-Project require fire flow, they are not modified since adjacent parcels may govern the fire flow requirement.

Near-Term Hydraulic Model Results

The water system is evaluated under Peak Hour Demand (PHD) to ensure a minimum pressure of 40 psi can be maintained per the City's design performance criteria. A peaking factor of 1.73, taken from the 2022 WMP, is applied to the average daily water demand. There are no existing hydraulic deficiencies per the minimum pressure requirements near the Project site in either the Existing or Near-Term Future Condition. The system has capacity for the increased Project demand while meeting PHD performance criteria and does not affect previous study findings.

The water system is also evaluated under Existing and Near-Term Future Conditions to ensure adequate capacity is available to convey fire flows under Maximum-Day Demand (MDD) Conditions while maintaining a minimum pressure of 20 psi in the system. A peaking factor of 1.25, taken from the 2022 WMP, is applied to the ADD to represent MDD Conditions for which the fire flow analysis is conducted. Results shown are based on removing the 15 ft/s velocity constraint from the fire flow analysis.

The Near-Term Future Conditions planning-level fire flow requirements are met by most of the water mains that serve the Project parcels assuming all CIPs outlined in the 2022 WMP are constructed, as shown in Figure 2. The Project demands do not create any new deficiencies in the system. There are several existing deficiencies within the water system as shown in Figure 2. The Project's impact to most fire flow nodes in the City is less than a 1% available flow reduction, with the exception of two locations in Pressure Zone 2. Table 3 outlines the impacts of the Project demand at these locations for the Near-Term Future Condition. Only one set of these deficient nodes (J-393 & J-377) are near project parcels.

Near-Term Project Contribution to Deficiencies

There are no deficiencies directly adjacent to the Project sites in the Near-Term Future Condition, assuming all the CIPs outlined in the 2022 WMP have been constructed. The water system has sufficient capacity to serve the Project. There are several deficiencies in the Near-Term Future Condition within Pressure Zones 1 and 2; however, the Project does not impact a majority of the available fire flows. The Project demands have an impact on the available flows at two of these deficient locations as highlighted in Figures 2. Table 3 summarizes the impacts from the Project demands.

Table 3: Impacted Fire Flow Deficiencies

Junctions	Required Fire Flow (gpm)	Future Available Fire Flow (gpm)	Decrease (%)
J-393 & J-377	2,500	Pre-Project: 1,674 Post-Project: 1,617	3.4%
J-148, J-150, & V-3075	3,500	Pre-Project: 3,416 Post-Project: 3,255	4.9%

Neither deficient location has an identified CIP in the 2022 WMP. Junctions J-393 and J-397 are near the western boundary of the City served by a dead-end 6-inch pipe along Monroe Drive that is served from one 8-inch pipe from Del Medio Court. The parcels on the northern side of Monroe Drive and the parcels to the east along Del Medio Court and Del Medio Avenue are all included in R3 Zoning District Update. A new Project-dependent CIP is recommended to adequately serve parcels along Monroe Drive.

As land development projects in this area are constructed, the City should consider the Project CIP shown in Figure 2. The CIP proposes upsizing the pipes in Monroe to 8-inch (approximately 1,000 linear feet) and the pipe along Del Medio Court to a 10-inch (approximately 900 linear feet) to resolve the fire flow deficiencies in this area. This CIP alleviates one deficiency at Junction J-393 and increases available flow at J-377, though does not remove the deficiency. It should be noted some of the parcels are currently occupied with detached single-family homes, which likely require lower fire flow rates. When new multi-family residential developments occur in this area, a project specific analysis should be conducted to determine detailed hydraulics and potential pipe interties with the City of Palo Alto water system in the area, as exact configurations have not been verified. It is not feasible to increase pipe sizes for the Project CIP beyond those studied for dead-end mains, and we recommend investigating the feasibility of installing a parallel main to feed this area if higher fire flows are required to serve new higher-density developments.

Junctions J-148, J-150, and V-3075 are located within the Walmart parking lot along Showers Drive and appear to be private fire hydrants served off a private fire service from Showers Drive. The public main along Showers Drive has sufficient capacity to provide 3,500 gpm fire flow rates. The specific required fire flow for the parcel may vary from the planning level fire flows used in the 2022 WMP and should be further investigated prior to considering the nodes as deficient.

Long-Term Supply

Table 4 shows the additional water demand due to Project buildout for the Long-Term Future Condition. The incremental increase in Average Daily Demand (ADD) with the Project is 1,600,000 GPD, which reflects a net increase of 16,000 DUs as provided in Table 4. To verify a Long-Term Future Condition planning level assessment, the total estimated Project water demand (1,600,000 gpd) is used to verify the City's water supply sufficiency.

The increased water demand from Project development in the Long-Term Future Cumulative Condition is compared with the City's supply turnouts from San Francisco Public Utility Commission (SFPUC) and Valley Water (VW) and groundwater well capacities to ensure demand can be met. The Mountain View water system is divided into three pressure zones to maintain reasonable pressures throughout the City's rising topography moving south, further from the Bay.

Water demand versus supply capacity for the City during average annual demands and during peak hour demands is given in Table 5. Total capacity for the City includes peak hour turnout capacity from SFPUC Turnouts #5, #7, and #14, VW Turnouts, and can be supplemented by additional supply from Wells #19, #21, #22, and #23, if needed, as outlined in Table 3-1 of the 2022 WMP. Average demands are compared to capacity rights from the City's supply sources outlined in the 2020 UWMP. Capacity rights are based on an average supply throughout the year and are compared to average demands for the planning year of 2045 developed in the 2020 UWMP. Based on this analysis, the City has sufficient capacity to serve customer demands in normal supply years. The UWMP also identifies available capacities in multiple dry years in the event of a sustained drought. The City has plans during drought years to implement the water shortage contingency plan to reduce demands by up to 20% to account for less available supply. During multiple dry years, the City has an available maximum water supply of up to 11.53 mgd. During multiple dry years following the Cities implementation of the water shortage contingency plan post-Project City-wide demands would total 11.39 mgd. The City's recycled water supply is not considered in this analysis and can be used to reduce future potable water demands as well.

Table 4: Long-Term Future Additional Water Demand

Scenario	Individual Use	Units	Generation Factor (gpd/DU)	Incremental Addition from the Project (gpd)
Long-Term R3 Zoning District Update	MFR	16,000 over Existing	100	1,600,000

Table 5: Long-Term Future Cumulative Condition Demand Versus Supply

	2045 Long-Term Future Cumulative Demand				Average Capacity Rights (mgd)[3]	Total PHD Capacity (mgd)[4]
	Pre-Project		Post-Project			
	ADD[1] (mgd)	PHD[2] (mgd)	ADD (mgd)	PHD (mgd)		
City-Wide	12.64	22.37	14.24	25.2	18.26	45.36

[1] ADD from Table 4-4 in the UWMP for 2045 demands (City of Mountain View, 2021)

[2] PHD is based on an average PHD peaking factor of 1.77 from the Water Master Plan (HydroScience Engineers, Inc., 2022)

[3] Total ADD Capacity from the UWMP including 12.46 mgd from SFPUC, 1.05 mgd from VW, and up to 4.75 mgd from groundwater wells. (City of Mountain View, 2021)

[4] Total PHD Capacity from Table 3-1 in the Water Master Plan (HydroScience Engineers, Inc., 2022)

Sewer System Impact

Near-Term Project Contribution

The existing Base Wastewater Flow (BWF) is approximately 600,000 GPD in the parcels affected by the project. The Project adds approximately 600,000 GPD of BWF in the Near-Term Future scenario flow estimates in the computer models. Base Wastewater Flow (BWF) is comprised of residential, commercial, institutional, office and industrial sources and represents a daily average for wastewater flows and is used to model City-wide demands.

The multi-family residential sewer duty factor is used from Table 4-2 in the NBPPPII Utility Impact Study to estimate sewer flow. Table 6 provides the estimated Near-Term Future Project sewer flow.

Table 6: Project Estimated Sewer Flow

Scenario	Individual Use	Units	Generation Factor (gpd/DU)	Modeled Sewer Generation (gpd)
Existing	Varies	9,000	varies	600,000
Near-Term	MFR	8,000 over Existing	75	600,000
			Total	**1,200,000**

Model Refinement (Alma Recorder Sewershed)

The City's Existing Condition hydraulic model includes the collection system and operating parameters developed for the Sewer Master Plan (SMP; Hydroscience, 2022). As part of the 2022 SMP, the model was updated to include the Los Altos Trunk Main. Invert elevations for the trunk main were estimated using interpolations based on an assumed slope and surveyed inverts near the San Antonio Metering Station. This approach replaced older datasets used in the 2014 and 2020 Los Altos Trunk Sewer analyses, which showed inconsistencies when compared to newer GIS and LiDAR data. The revised methodology improved model accuracy by aligning it with current surveyed information.

The SMP model incorporated improvements from the San Antonio Area Sewer Main Improvements – Phase 2 Project (Project 19-45 Phase 2) conformed plan set prepared by West Yost (August 2023), which replaces the existing Alma Recorder and relocates the City's connection to the Los Altos Trunk Main further downstream. The Project 19-45 Phase 2 location and alignment are shown in Figure 3. In December 2024, a revised plan set was issued with updated invert elevations and pipe sizes. The revised plans also indicated that the existing Los Altos Trunk Main invert at the new tie-in is approximately two feet higher than previously assumed during development of the SMP model. Schaaf & Wheeler revised the hydraulic model, accordingly, updating both the Project 19-45 Phase 2 elements and the Los Altos Trunk Main representation. The modeled trunk main was adjusted to match the field-verified invert elevation at the tie-in point while maintaining the slope assumed in the 2022 SMP model.

CIP 1 – Sondgroth Way/Showers Drive, located just upstream of the Alma Recorder, was identified in the 2022 SMP as a high-priority improvement to address capacity constraints in the existing 8- and 10-inch gravity mains extending from Showers Drive along Sondgroth Way through the Crossing HOA easement to San Antonio Circle. CIP 1 has since advanced through design as the San Antonio Area Sewer Main Improvements – Phase 1 Project (Project 19-45 Phase 1), which has recently bid for construction. Accordingly, Schaaf & Wheeler refined the Existing Condition model to incorporate Project 19-45 Phase 1 based on the latest design drawings prepared by West Yost (August 2025). The Project 19-45 Phase 1 location and alignment are identified in Figure 3.

Near-Term Model Results

Given the distributed locations of the Project sites across multiple sewersheds, Project-generated flows are conveyed through all major City trunk mains, including the West, Central, and East trunks, as well as the Los Altos Trunk Main. The total length of pipe along the affected

conveyance paths is approximately 3.5 miles. The Project's sewer conveyance pathway under the Near-Term Future Condition is shown in Figure 3.

Sewer capacity is analyzed under PWWF. PWWF is used to determine hydraulic deficiencies according to the performance criteria in Table 7. Once pipes are considered deficient, the design criteria outlined in Table 8 shall be used to size the CIP to correct the deficiency.

Table 7: Sewer System Performance Criteria

Criteria	Entire System
Minimum Freeboard in Each Manhole (ft)	5.0

Table 8: CIP Design Criteria

Criteria	Pipe Diameter ≤ 12 inch	Pipe Diameter > 12 inch
Maximum Flow Depth/Pipe Diameter (d/D)	0.50	0.75

The PWWF scenario applies diurnal peaking curves for residential and non-residential flows and simulates system response as rainfall enters the system. The diurnal peaking curves are adopted from the City's 2022 SMP. Groundwater Infiltration (GWI) and rainfall-dependent infiltration (RDI/I) are included but are not peaked. The ADWF scenario is developed in the model by adding BWF and groundwater GWI. As discussed in the 2022 SMP, dry-weather flows include GWI, which is modeled as a constant inflow and accounts for base infiltration (BI) and pumped groundwater discharged to the sewer system. Since the ADWF scenario models average daily flows, BWF and GWI are not peaked.

Under Existing Conditions, approximately 8,871 LF of the Project's conveyance path was identified as surcharged, including segments of the West Trunk. Of this length, 5,437 LF is attributed to backwater effects from downstream restrictions. All surcharged segments along the Project's conveyance path under Existing Conditions are not considered deficient, as the freeboard requirements listed in Table 7 are met. The Existing Condition results assume Project 19-45 Phase 1 and Phase 2 have been constructed.

Geometric revisions to the Project 19-45 Phase 2 alignment and the addition of Project 19-45 Phase 1 contribute to localized surcharging under Existing Conditions. Schaaf & Wheeler previously evaluated the Phase 2 alignment independently, prior to inclusion of Phase 1. Under Existing Conditions, the revised geometry resulted in surcharging along 560 LF of the Project 19-45 Phase 2 pipeline alignment, caused by downstream restrictions within the Los Altos Trunk Main. This represents an increase from the 18 LF of surcharge identified in the 2022 SMP Existing-Condition model, which reflected the previous alignment geometry.

With the addition of Project 19-45 Phase 1, Existing Condition model results indicate increased flows entering the Los Altos Trunk Main, with a peak flow of 2.04 mgd compared to 1.73 mgd previously observed within the main in the 2022 SMP Existing Condition model, which did not include this improvement. The 2.04 mgd peak flow occurs during the 10-year, 24-hour storm event and represents a short-duration peak response, with the exceedance persisting for approximately 1 hour during the model simulation. Under dry weather conditions, the instantaneous peak flow through the trunk is approximately 1.01 mgd.

The project removes an upstream hydraulic constraint, allowing greater conveyance of flow to the Alma Recorder. This increase in conveyed-flow results in surcharging within the downstream system, as the Los Altos Trunk Main remains hydraulically constrained. Under Existing Conditions, incorporation of Projects 19-45 Phase 1 and Phase 2 results in approximately 560 LF of the proposed Alma Recorder bypass and 312 LF of the Phase 1 alignment surcharging due to these downstream restrictions.

In the Near-Term Future Condition, 4,824 LF of the Project's conveyance path was found to be surcharged, including segments of the West Trunk. Of this, 3,947 LF is attributed to backwater conditions caused by the downstream restrictions. In the Near-Term Future Condition, the increased Project flow results in an additional 3,246 LF of surcharged pipe including segments of both the West and Central Trunks. Two CIP's, CIP 5 and 6, outlined in the 2022 SMP as condition related repairs are located along the affected sewer conveyance pathway. The CIPs include improvements relating to the Shoreline Pump Station and Interceptor Trunk downstream of the Pump Station. The Near-Term Future Condition results identify no hydraulic deficiencies along the Project pathways.

Under Near-Term Future Conditions, geometric revisions to the Project 19-45 Phase 2 alignment resulted in approximately 560 LF of the proposed Alma Recorder bypass experiencing surcharge due to downstream restrictions within the Los Altos Trunk Main. This contrasts with the 18 LF of surcharge identified in the 2022 SMP 2030-Condition model, which reflected the previous alignment geometry. The 2022 SMP 2030-Condition model included CIP 1, which represented the conceptual version of the Project 19-45 Phase 1. As outlined in the modeling refinement section of this study, the hydraulic modeling of the Los Altos Trunk Main relies heavily on assumptions and limited survey data collected far downstream from the City's proposed connection. To refine the hydraulic analysis of the backwater effects at the Alma Recorder under Existing and Near-Term Future Conditions, it is recommended that detailed field surveying of the Los Altos Trunk manholes and pipeline be conducted.

Near-Term Project Contribution to Deficiencies

There are no hydraulic deficiencies along the Project conveyance pathway in the Existing Condition nor in the Near-Term Future Condition.

There are two sewer projects, CIP 5 and CIP 6, identified in the 2022 SMP for condition-related repairs downstream of the Project site; these improvements are not capacity-related. There are no downstream pipes along the project sewer flow paths that are recommended for upsizing in the 2022 SMP, nor were any identified under this study. Therefore, a fair share analysis is not performed.

Long-Term Sewage Treatment Capacity

Project generated sewer flow in the long-term scenario is estimated from the maximum number of multi-family dwelling units projected at full buildout, as identified in the Project Notice of Preparation of a Draft Environmental Impact Report (EIR) dated July 2025.

The majority of the City's wastewater collection system conveys sewage primarily by gravity through three main trunk lines that flow north toward the Shoreline Pump Station (SPS) as shown in Figure 3. From the SPS, flow is pumped to the gravity Joint Interceptor Sewer, which conveys it to the Palo Alto Regional Water Quality Control Plant (RWQCP). A portion of the City's wastewater collection system discharges to the Los Altos San Antonio Trunk (Los Altos Trunk) which also connects to the Joint Interceptor downstream of the SPS. Under the 1968

Basic Agreement with Palo Alto and Los Altos, and subsequent amendments, each agency owns or purchases treatment and conveyance capacity in terms of Average Annual Flow (AAF), defined as 1.05 times the Average Dry Weather Flow (ADWF). Mountain View's total capacity right of 15.1 MGD AAF, allotted by the Basic Agreement, includes both flow routed through the SPS and flow conveyed by the Los Altos Trunk.

Table 10 shows the City sewer generation under the Long-Term Future Cumulative Condition, including flows associated with Project development, compared to the City's RWQCP capacity rights to confirm that adequate treatment capacity is available. Non-project sewer generation was estimated using adapted planning year 2045 average water demand projections from the 2020 UWMP and applying a return-to-sewer (RTS) ratio of 0.8, consistent with the RTS assumption used in the 2022 SMP. Project-related sewer generation (Table 9) was then added to the baseline flows to estimate post-Project sewer generation for the 2045 planning horizon.

Table 9: Long Term Future Additional Sewer Flow

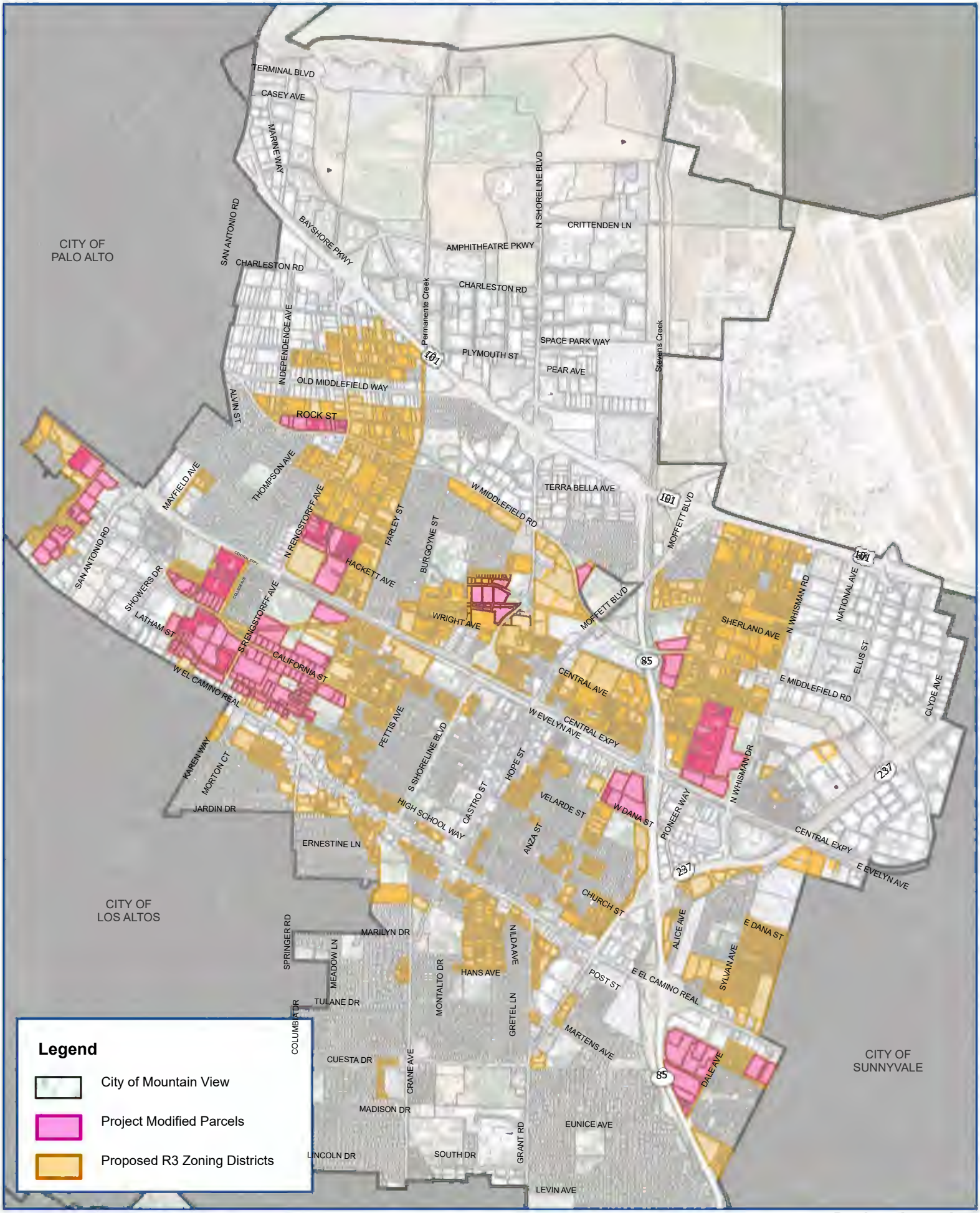
Project	Individual Use	Units	Generation Factor (gpd/DU)	Sewer Generation (gpd)
Long-Term R3 Zoning District Update	MFR	16,000 over Existing	75	1,200,000

Table 10: Capacity Rights Comparison

Facility	Mountain View Contractual Capacity (MGD)	2045 Long-Term Future Cumulative Average Annual Flow[2]	
		Pre-Project (MGD)	Post-Project (MGD)
RWQCP Treatment	15.1[1]	10.62	11.88

[1] *RWQCP Treatment Capacity = Average Annual Flow (AAF)*

[2] *AAF sewer generation is based on 1.05 × ADD from Table 4-4 of the 2020 UWMP (City of Mountain View, 2021) with a return-to-sewer (RTS) factor of 0.8 applied.*

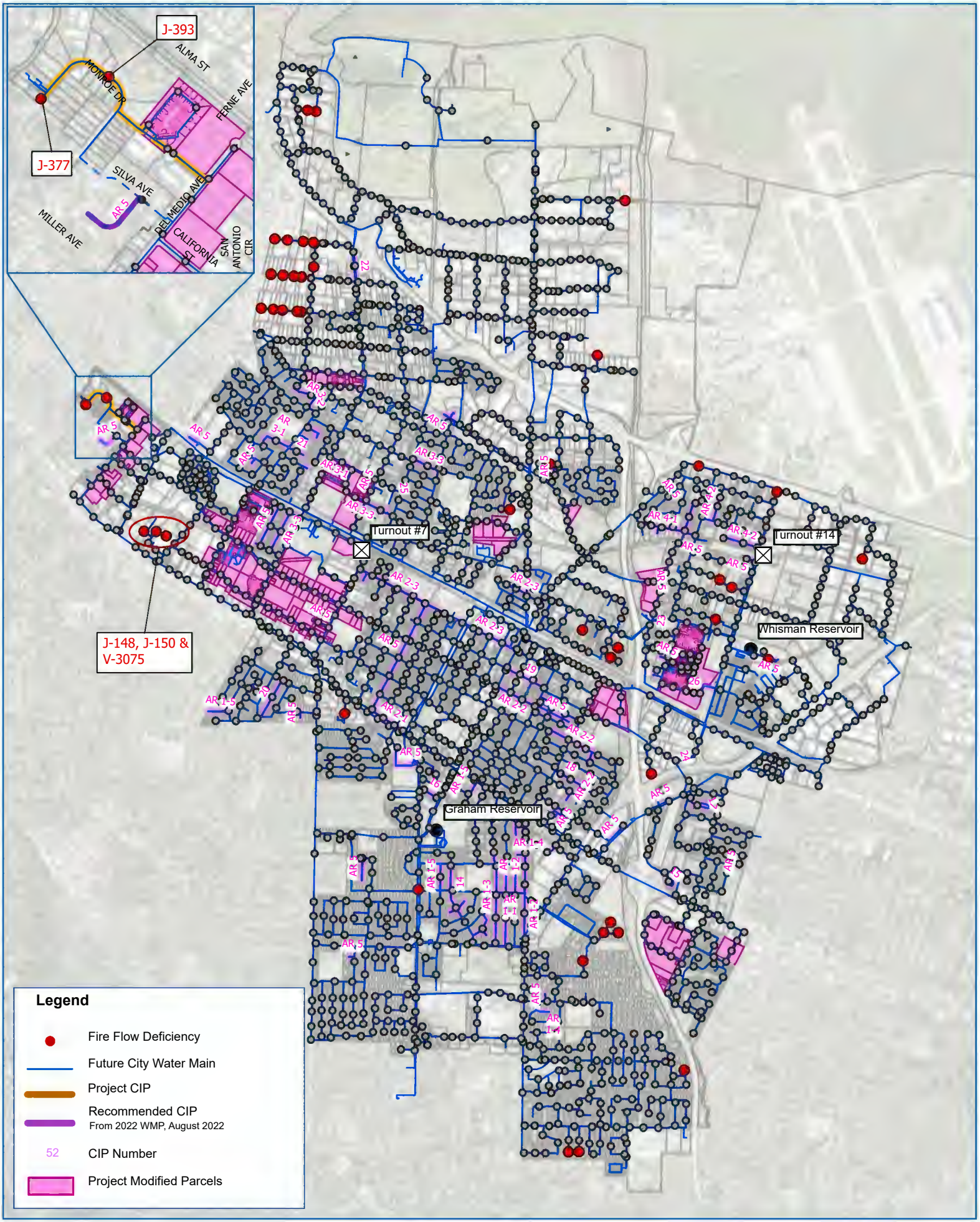


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0 1,000 2,000 Feet

FIGURE 1: **Project Location**

CMV R3 Zoning District Update | May 2026



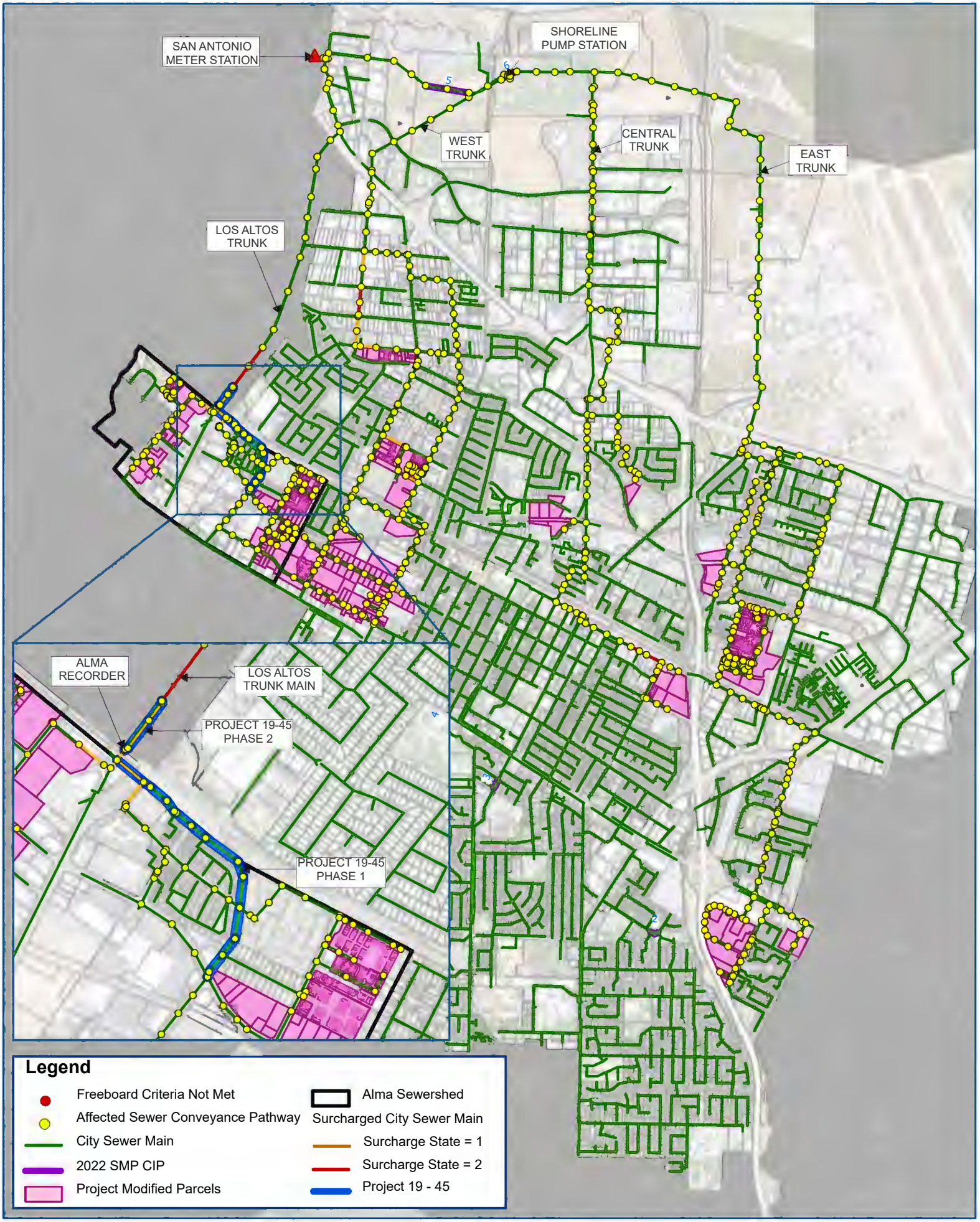
SCHAAF & WHEELER
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0 1,400 2,800 Feet

N

FIGURE 2: **Fire Flow Analysis - Near Term**

Water System Model - Near Term Future Condition



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0 1,400 2,800 Feet

FIGURE 3: **Peak Wet Weather Flow - Near Term**
Sewer System Model - Near Term Future Condition