



R3 Zoning District Update

Final Environmental Impact Report
State Clearinghouse Number: 2025070500

prepared by

City of Mountain View
Planning Division, Community Development Department
500 Castro Street, PO Box 7540
Mountain View, California 94039-7540
Contact: Eric Anderson, Planning Manager

prepared with the assistance of

Rincon Consultants
66 Franklin Street, Suites 314, 357 and 381
Oakland, California 94607

September 2026

Table of Contents

1	Introduction.....	1-1
1.1	Final EIR Contents.....	1-1
1.2	Draft EIR Public Review Process.....	1-1
1.3	EIR Certification Process and Project Approval.....	1-2
1.4	Draft EIR Recirculation Not Required.....	1-2
2	List of Commenters.....	2-1
2.1	Comments and Responses.....	2-1
2.2	Master Responses.....	2-1
3	Revisions to the Draft EIR.....	3-1
3.1	Revisions to the Draft EIR.....	3-2
4	Mitigation Monitoring and Reporting Program.....	4-1

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1 Introduction

1.1 Final EIR Contents

This Final Environmental Impact Report (Final EIR) has been prepared by the City of Mountain View to evaluate the potential environmental impacts of the proposed City of Mountain View R3 Zoning District Update, referred to herein as the Proposed Project or General Plan Update (“Proposed Project” or “Project”).

As prescribed by the California Environmental Quality Act (CEQA) *Guidelines* Sections 15088 and 15132, the lead agency (the City) is required to evaluate comments on environmental issues received from persons who have reviewed the Draft EIR and to prepare written responses to those comments. This document, together with the Draft EIR (incorporated by reference) comprise the Final EIR for this project. This Final EIR includes individual responses to each letter received during the public review period for the Draft EIR. In accordance with CEQA *Guidelines* Section 15088(c), the written responses describe the disposition of significant environmental issues raised.

The City has provided a good faith effort to respond to environmental issues raised by the comments. The Final EIR also includes amendments to the Draft EIR consisting of changes suggested by certain comments, as well as minor clarifications, corrections, or revisions to the Draft EIR. The Final EIR includes the following contents:

- Section 1: Introduction
- Section 2: Responses to Comments on the Draft EIR, which also includes a list of all commenters and public comment letters
- Section 3: Revisions to the Draft EIR
- Section 4: Mitigation Monitoring and Report Program

1.2 Draft EIR Public Review Process

The City of Mountain View distributed a Notice of Preparation (NOP) of the EIR for a 30-day local review period starting on July 9, 2025 and ending on August 11, 2025. In addition, the City held an EIR Scoping Meeting on July 23, 2025. The meeting was aimed at providing information about the Proposed Project to members of public agencies, interested stakeholders and residents/community members. The City received four written comment letters from public agencies, three written comment letters from organizations, and seven written comment letters from individuals. There were also several verbal comments received at the scoping meeting. The NOP is presented in Appendix A of the Draft EIR and NOP comments were addressed, as appropriate, in the Draft EIR (refer to Table 1-1, beginning on page 1-4 of the Draft EIR).

The City published a Notice of Availability (NOA) of the Draft EIR with the Santa Clara County Clerk on May 15, 2026 to begin the local review period which ended on June 29, 2026 at 5:00 PM. In addition, the City published the NOA and filed a Notice of Completion (NOC) with the Governor’s Office of Land Use and Climate Innovation (LCI) to begin the 45-day public review period (Public Resources Code Section 21161), which began the state review period on May 20, 2026, and ended on July 4, 2026. The Draft EIR was made available on the City’s project website (<https://www.mountainview.gov/our-city/departments/community-development/planning/active-projects/r3-zoning-update>). The NOA was filed with the Santa Clara County Clerk, and emailed to individuals who requested written notifications related to the project. As a result of these notification efforts, 11 written comments on the content of the Draft EIR were received, including comment letters from agencies, community organizations, and individuals. Section 2, *Responses to Comments on the Draft EIR*, identifies these commenting parties, their respective comments, and responses to these comments.

1.3 EIR Certification Process and Project Approval

Before acting on the Proposed Project, the lead agency is required to certify that the EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the lead agency. Following certification of an EIR, the lead agency may make a decision on the project analyzed in the EIR. In approving a project, for each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either: (a) the project has been changed to avoid or substantially reduce the magnitude of the impact; (b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or (c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). Per Public Resources Code Section 21061.1, feasible 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.

If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision and explains why the project's benefits outweigh the significant environmental effects (*CEQA Guidelines* Section 15093).

When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects (*CEQA Guidelines* Section 15091[d]).

1.4 Draft EIR Recirculation Not Required

CEQA Guidelines Section 15088.5 requires Draft EIR recirculation when comments on the Draft EIR or responses thereto identify "significant new information." Significant new information is defined as including:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The comments, responses, and Draft EIR amendments presented in this document do not constitute such "significant new information;" instead, they clarify, amplify, or make insignificant modifications to the Draft EIR. For example, none of the comments, responses, and Draft EIR amendments disclose new or substantially more severe significant environmental effects of the Proposed Project, or new feasible mitigation measures or alternatives considerably different than those analyzed in the Draft EIR that would clearly lessen the Proposed Project's significant effects.

2 List of Commenters

This section includes comments received during public circulation of the Draft Environmental Impact Report (EIR) prepared for the R3 Zoning District Update (Proposed Project).

The Draft EIR was circulated for a 45-day public review period that began on May 20, 2026 and ended on July 4, 2026. The City of Mountain View received 11 comment letters on the Draft EIR. The commenters and the page number on which each commenter's letter appear are listed below.

Letter No. and Commenter	Page No.
1 Yunsheng Luo, California Department of Transportation	2-5
2 Elton Wu, San Francisco Public Utilities Commission	2-10
3 Jeff Baier, Mountain View Whisman School District	2-15
4 Lillian Tsang, City of Sunnyvale Division of Transportation and Traffic	2-19
5 Shree Dharasker, Valley Water	2-23
6 Robert Cain, City of Palo Alto Planning and Development Services Division	2-29
7 Julie and Chuck Muir	2-35
8 Jessica and Soosh Gandhi	2-38
9 Toni Rath	2-43
10 Erin Chappell, California Department of Fish and Wildlife	2-45
11 Aarthi Rajiv and Rajiv Subrahmanyam	2-60

2.1 Comments and Responses

The comment letters and responses follow. The comment letters are numbered chronologically based on the date received. Each comment letter is assigned a sequential number, and each separate issue raised by the commenter, if more than one, has also been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in Comment Letter 1).

Where a comment resulted in a change to the Draft EIR text, a notation is made in the response indicating that the text is revised. Changes in text are signified by strikeout font (~~strikeout font~~) where text was removed and by underlined font (underlined font) where text was added. These changes in text are also included in Section 3, Revisions to the Draft EIR.

2.2 Master Responses

This subsection includes topical master responses to recurring written comments. As a general introduction, it should be noted that the conclusions presented in the Final EIR on the character and significance level of environmental impacts are supported by substantial evidence, which is presented in the Draft EIR and further clarified in this responses to comments chapter. The City acknowledges that some commenters disagree with some conclusions in the EIR. Consistent with the intent of CEQA and the *CEQA Guidelines* for its implementation, this document also includes the differing opinions presented by the commenters. As stated in Section 15151 of the *CEQA Guidelines*, disagreement among commenters, including experts, does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. This practice is followed in the following responses.

Master Response 1: General Opposition

Several commenters expressed general opposition to the Proposed Project but did not raise specific environmental issues related to the adequacy of the environmental impact analysis, and/or objected generally regarding the adequacy of the environmental impact analysis but did not provide a specific basis to support the asserted inadequacy and on which to base a specific response.

Comments received during the public comment period, including personal opinions expressing general support for, or opposition to, the Proposed Project are noted and included in this Final EIR for consideration by the City decision-makers, but do not require a specific written response if they do not relate to an environmental issue that is addressed within the Draft EIR and/or otherwise within the purview of CEQA. For example, comments objecting to or supporting the increase in residential density but that do not identify specific adverse impacts to the environment or specifically question or challenge the Draft EIR's analysis and conclusions will be shared with the decision-makers, but do not raise environmental issues that require a specific response.

Similarly, comments generally objecting to or expressing support for the Proposed Project, or questioning the City's planning process, do not raise issues related to the Proposed Project's impact on the physical environment that require a specific response pursuant to CEQA. Likewise, opinions about the general desirability, merits, and/or purely economic, social, or political considerations of the Proposed Project are not within the purview of CEQA (*CEQA Guidelines* Section 15131a) and do not require a specific written response in this Final EIR (*CEQA Guidelines* Section 15088a).

In cases where the commenter provides an opinion and/or generalized concerns about the merits of the Proposed Project but does not identify any particular issue concerning the sufficiency of the Draft EIR, the City notes the opinion in this Final EIR for informational purposes and for consideration by the decision-makers, who will consider all comments. Where a commenter offers unsubstantiated assertions about a significant environmental issue or the adequacy of the Draft EIR, the City notes the assertion in this Final EIR for informational purposes. Therefore, no changes to the Draft EIR are made in response to these comments.

Master Response 2: Compatibility Between Higher-Density Residential Development and Adjacent Single-Family Neighborhoods

Several commenters expressed concerns regarding the potential effects of future higher-density residential development adjacent to existing single-family neighborhoods. Specifically, commenters raised concerns regarding building height, massing, setbacks, privacy, shadowing, sunlight access, neighborhood character, visual compatibility, transitions between higher-density and lower-density residential development, and the potential use of State Density Bonus Law provisions. Several commenters also requested additional development standards, including increased setbacks, upper-story step-backs, landscape buffers, solar shade analyses, and other neighborhood-specific design requirements.

The Draft EIR evaluates the proposed R3 Zoning District Update at a programmatic level, consistent with CEQA requirements. The purpose of an EIR is to identify and evaluate the physical environmental effects that could result from implementation of the Proposed Project. An EIR is not required to determine the preferred development standards, resolve land use policy debates, or establish specific design requirements for future projects. Rather, CEQA requires evaluation of the environmental consequences associated with the range and intensity of development that could occur under the proposed zoning framework.

With respect to neighborhood compatibility concerns, CEQA does not require analysis of social, economic, or community preference issues except to the extent such concerns result in a physical environmental effect. Concerns regarding whether a particular building height, setback, architectural style, density level, or zoning designation represents the preferred planning outcome for a neighborhood are primarily policy considerations for decision-makers rather than environmental impacts requiring separate analysis under CEQA.

The Draft EIR evaluates aesthetic impacts in Section 4.1, *Aesthetics*, consistent with CEQA requirements. Specifically, the EIR analyzes the potential effects of the project on scenic vistas, visual character and quality, public views, and light and glare. On page 4.1-1 of the Draft EIR states that CEQA requires evaluation of physical environmental impacts and that a significant effect on the environment means a "substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project." Consistent with those requirements, the EIR evaluates whether development facilitated by the project could substantially adversely affect scenic views and visual character. More specifically, Impact AES-1, on page 4.1-18 of the Draft EIR, concluded the following:

"Implementation of the Proposed Project would facilitate increased development massing and scale on certain parcels in Mountain View, which could affect scenic views. However, scenic views of natural features are largely obscured by existing development and other intervening features in these areas, and compliance with the proposed development standards, the Mountain View General Plan, and the City Code would further ensure the protection of available scenic vistas. Impacts would be less than significant."

Similarly, Impact AES-3, on page 4.1-19 of the Draft EIR, specifically evaluated concerns regarding building massing, building height, and public views, finding:

"The Proposed Project would facilitate an increase in building density, massing, and height which could potentially obscure or block public views. The Proposed Project includes new, objective form-based development standards, and visual character and scenic quality would also be protected through adherence to City design guidelines and implementation of goals and policies in the City's General Plan and City Code that address visual character and quality of public views. Impacts would be less than significant."

With respect to lighting and glare, Impact AES-4 on page 4.1-21 of the Draft EIR, determined whether future development could create new sources of light or glare and concluded:

"Development facilitated by the Proposed Project would create new sources of light or glare that could adversely affect daytime or nighttime views in the area. Compliance with the 2030 General Plan development standards related to lighting and glare would ensure this impact is less than significant."

Furthermore, the Draft EIR noted that future development would be subject to City lighting-plan requirements demonstrating that outdoor lighting would not result in significant glare or spillover effects on surrounding properties on page 4.1-16.

Several commenters also expressed concerns regarding privacy, solar access, and shadowing effects on neighboring residences. CEQA does not generally consider privacy impacts, neighborhood preferences, or changes in perceived neighborhood character to be environmental impacts unless they result in a physical environmental effect. Likewise, because the project is a citywide zoning update and does not approve specific development proposals, building footprints, building orientation, or site plans, detailed project-level analyses of privacy impacts, specific shadow patterns on individual properties, or sightline impacts are not feasible at the programmatic level. The EIR therefore evaluates the reasonably foreseeable physical environmental effects associated with the zoning update, including aesthetics, visual character, public views, and light and glare, as required by CEQA. Where future development proposals require additional environmental review, project-specific impacts would be evaluated based on the characteristics of the proposed development and surrounding environment at that time.

Accordingly, the Draft EIR evaluated aesthetic impacts consistent with CEQA requirements and concludes that impacts related to scenic vistas, visual character, public views, and light and glare would be less than significant with implementation of existing City policies and regulations. To the extent commenters request alternative zoning standards, greater setbacks, lower heights, additional step-backs, landscape buffers, or other design requirements, those recommendations constitute planning and policy recommendations for consideration by City decision-makers rather than deficiencies in the EIR's

environmental analysis. Therefore, no revisions to the Draft EIR are required in response to these comments.

Master Response 3: Comments on Proposed Zoning Standards, Land Use Designations, and Planning Policy

Several commenters expressed concerns regarding the proposed zoning framework, including the location and extent of proposed R3 zoning districts, the selection of specific parcels for higher-intensity residential designations, the appropriateness of development standards adjacent to single-family residential neighborhoods, and proposed standards related to building height, setbacks, step-backs, parking requirements, and landscape buffers. Several commenters also recommended revisions to the proposed zoning standards, requested additional neighborhood-specific protections, suggested concentrating future growth in particular areas of the city, or questioned the rationale for specific zoning designations.

The Draft EIR is a program-level environmental document that evaluates the physical environmental effects of the proposed R3 Zoning District Update. CEQA requires that comments concerning the adequacy of the environmental analysis be considered and responded to in the Final EIR. However, comments expressing preferences regarding the City's proposed zoning framework, development standards, land use policies, or planning objectives do not necessarily constitute comments on the adequacy of the environmental analysis itself. Rather, such comments generally address policy choices that are within the discretion of the City Council and other decision-makers. Accordingly, while these comments will be provided to decision-makers for consideration as part of the public record, they do not necessarily warrant revisions to the environmental analysis unless they identify a specific deficiency in the EIR's evaluation of environmental impacts.

The Draft EIR evaluates the environmental effects associated with the range of development that could occur under the proposed zoning framework, including increased residential densities, changes in allowable building heights, and the potential redevelopment of properties throughout the project area. The analysis is intended to evaluate the environmental consequences of the proposed zoning update as a whole rather than determine the preferred policy outcome for individual neighborhoods, parcels, or development standards. Decisions regarding the appropriateness of specific zoning classifications, development standards, transition requirements, parking ratios, setback requirements, parcel selection, or other land use policy considerations are matters for consideration by the City decision-makers during the project approval process.

Likewise, comments recommending modifications to proposed zoning standards, including requests for increased setbacks, additional step-back requirements, lower building heights, expanded buffering requirements, revised parking standards, or changes to the location of higher-density residential areas, constitute recommendations regarding the content of the proposed zoning update rather than comments on the adequacy of the environmental analysis. Such recommendations may be considered by the City as part of its deliberations regarding the project; however, CEQA does not require the EIR to evaluate every alternative zoning standard or policy preference proposed by commenters. The Draft EIR provides decision-makers with information regarding the environmental effects of the Proposed Project and a reasonable range of alternatives, consistent with CEQA requirements.

Accordingly, these comments are noted and will be considered by the City's decision-makers. However, because the comments generally address proposed zoning standards, land use designations, policy choices, and planning preferences rather than identifying deficiencies in the environmental analysis, no revisions to the Draft EIR are required in response to these comments.

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



June 17, 2026

SCH #: 2025070500
GTS #: 04-SCL-2025-01533
GTS ID: 37127
Co/Rt/Pm: SCL/VAR/VAR

Eric Anderson, Planning Manager
City of Mountain View
500 Castro St, P.O. Box 7540
Mountain View, CA 94039-7540

Re: The R3 Zoning District Update Project – Draft Environmental Impact Report (DEIR)

Dear Eric Anderson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the R3 Zoning District Update Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the May 2026 DEIR.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Project Understanding

The proposed project will update the City of Mountain View's General Plan, Zoning Code, Zoning Map, and various Precise Plans to account for 10,000-16,000 additional residential units through the year 2050. The update would apply to approximately 8,350 parcels, covering about 1,260 acres citywide, including a number of parcels adjacent to the State Transportation Network (STN). The project area encompasses segments of several State highways, including U.S. Route 101, State Route (SR) 82, SR 85, and SR 237.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide ([link](#)).

The project VMT analysis and significance determination are undertaken in a manner consistent with the City's approved qualitative infill housing VMT assessment approach. Per the DEIR, this project is found to have a less than significant VMT impact as it would allow for increased residential densities in the R3 Zoning District and promotes infill development and affordable housing, therefore working towards meeting the State's VMT reduction goals.

1.2 cont.

Integrated Transportation and Land Use Planning

Transportation and housing are integrally connected. The R3 Zoning District Update Project provides a mechanism to reflect current transportation and land use policy and adopt efficient land-use strategies such as transit-oriented, infill and mixed-use developments that can potentially reduce vehicle miles traveled and address climate change.

1.3

Please review and include reference to the current California Transportation Plan (CTP) in the DEIR. CTP 2050 ([link](#)) envisions that the majority of new housing located near existing housing, jobs, and transit, and in close proximity to one another will reduce vehicle travel and GHG emissions, and be accessible and affordable for all Californians, including disadvantaged and low-income communities. The location, density, and affordability of future housing will dictate much of our future travel patterns, and our ability to achieve the vision outlined in CTP 2050. Caltrans encourages the City to consider and explore the potential of excess state-owned property for affordable housing development, per Executive Order N-06-19.

1.4

Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through efficient and equitable land use planning and policies. The City should also continue to coordinate with Caltrans to identify and implement necessary network improvements and impact mitigation.

1.5

Equity and Public Engagement

We will achieve equity when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel. Caltrans is committed to advancing equity and livability in all communities. We look forward to collaborating with the City to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities.

Caltrans encourages the City to foster meaningful, equitable and ongoing public engagement in the R3 Zoning District Update process to ensure future transportation decisions and investments reflect community interests and values. The public engagement process should include community-sensitive and equity-focused

1.6

Eric Anderson, Planning Manager
June 17, 2026
Page 3

approaches seeking out the needs of individuals from underserved, Tribal, and low-income communities, the elderly, and individuals with disabilities.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Associate Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Sincerely,



YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

1.6 cont.

Letter 1

Commenter: Yunsheng Luo, California Department of Transportation (Caltrans)

Date: June 17, 2026

Response 1.1

This comment provides informational comments. No revisions to the Draft EIR are required in response to this comment.

Response 1.2

As discussed in Section 4.13, *Transportation*, and Appendix C, *Transportation Impact Analysis*, the Proposed Project's transportation analysis was prepared consistent with Senate Bill 743, *CEQA Guidelines* Section 15064.3, and the City's adopted VMT methodology. The Draft EIR concludes that the project would result in a less-than-significant project-level VMT impact because it facilitates infill residential development in an existing urbanized area with access to jobs, transit, and active transportation facilities.

The City appreciates the commenter's recognition that the Project supports State goals related to VMT reduction, infill development, and housing production. No revisions to the Draft EIR are required in response to this comment.

Response 1.3

The goals and planning framework described in the CTP 2050 are generally consistent with the Proposed Project's emphasis on infill residential development within an existing urbanized area and in proximity to employment centers and transit facilities. Accordingly, the following addition was made to page 4.13-4 of the Draft EIR:

California Transportation Plan 2050

The California Transportation Plan 2050 (CTP 2050), prepared by the California Department of Transportation, establishes a long-range statewide transportation vision intended to support California's climate, equity, public health, and economic goals through an integrated transportation and land use framework. The CTP 2050 promotes development patterns that reduce vehicle travel demand by encouraging housing in locations near jobs, transit, services, and other daily destinations. The plan supports infill development, multimodal transportation systems, active transportation opportunities, and transportation investments that improve mobility while reducing greenhouse gas emissions and vehicle miles traveled.

The commenter's suggestion regarding the potential use of excess state-owned property for affordable housing concerns future housing policy and implementation considerations and does not raise an issue regarding the adequacy of the environmental analysis in the Draft EIR. No additional revisions to the Draft EIR are required in response to this portion of the comment.

Response 1.4

The Draft EIR evaluates the transportation impacts associated with implementation of the Proposed Project in Section 4.13, *Transportation*, including the effects of increased residential development in an existing urbanized area. The Proposed Project is intended to support infill housing opportunities in locations with access to employment centers, transit service, commercial uses, and existing infrastructure, consistent with regional and statewide planning objectives described in the Draft EIR.

The City appreciates Caltrans' comments regarding the importance of continued coordination between transportation and land use planning efforts. Future transportation improvements and transportation-related projects involving state facilities would continue to be coordinated with Caltrans, as appropriate. The comment does not identify a deficiency in the environmental analysis contained in the Draft EIR; therefore, no revisions to the Draft EIR are required in response to this comment.

Response 1.5

The City acknowledges and appreciates the comment. The commenter does not raise a substantive issue regarding the adequacy of the Draft EIR or identify a significant environmental impact that has not been analyzed. The City values ongoing coordination with Caltrans and other public agencies and will continue its public engagement and interagency coordination efforts as future planning, transportation, and infrastructure projects are considered.

Response 1.6

This comment does not contain a substantive comment on the Draft EIR; however, the City acknowledges this comment and affirms the importance of collecting input from underserved communities. The R3 project included targeted outreach to every neighborhood in the City, tenants' groups, Spanish-speaking and Chinese-speaking populations, tribal communities, and broad, community-wide efforts. The City commits to continuing their public engagement work for future transportation projects within the city. No revisions to the Draft EIR would be required in response to this comment.

From: Wu, Elton H <[REDACTED]>
Sent: Thursday, June 18, 2026 4:06 PM
To: Anderson, Eric B. <[REDACTED]>
Cc: Rando, Casey <[REDACTED]>; RES <[REDACTED]>; Read, Emily <[REDACTED]>; Leung, Tracy <[REDACTED]>; Wilson, Joanne <[REDACTED]>
Subject: RE: Notice of Availability - Draft Environmental Impact Report - R3 Zoning District Update

Hello Eric,

Thank you for sending the Notice of Availability (NOA) for the EIR for the R-3 Zoning District Update Project.

On July 21, 2025, SFPUC had sent preliminary comments (attached to this email) and SFPUC has similar comments for the NOA. To protect its water supply infrastructure and to allow maintenance and operation activities, the SFPUC's policies does not allow structures to be built on its pipeline right of way. Housing, construction staging, or any unauthorized use of SFPUC property in Mountain View is not permitted.

During project intake on sites on or near SFPUC property, please have project teams reach out to SFPUC or send a public notice at [REDACTED].

Prohibited Uses

The SFPUC does not allow any disfavored use on SFPUC land that:

- is prohibited by the deed to which the City acquired a particular fee or easement;
- would impair the SFPUC's 24-hour-a-day/seven-day-a-week access to its land and facilities.
- constitutes an unauthorized encroachment.
- risks the contamination of SFPUC land or water with hazardous materials.
- would allow the use of or storage of combustible materials on SFPUC land.
- would install an aerial utility crossing or overhead transmission line within the Right of Way or in a watershed.
- cannot be removed promptly to allow the SFPUC to perform the construction, maintenance, or emergency repair of its facilities.
- fulfills another jurisdiction's open space, setback, parking, or other third-party development requirements or waived requirements.
- fulfills a third party's environmental mitigation requirement.
- would allow a public agency to use SFPUC land to enhance or mitigate the effects of private development or for any commercial or revenue-generating activity (other than for municipal utility purposes);
- would disturb a wetland, natural plant area, special status species, or other sensitive natural habitat on SFPUC land;
- includes the installation of surface and subsurface structures, trees, or large shrubs on the Right of Way. (Examples of such structures are concrete slabs, foundations, vaults, decks, detention basins, pools, and anything else that is not portable and easily movable);
- makes the Right of Way the sole emergency access to a neighboring property.
- creates a regulatory compliance issue.
- includes the installation of utilities, roads, fences, or other improvements parallel to, rather than across, SFPUC pipelines or electric transmission lines. All improvements crossing SFPUC land must do so perpendicularly to the centerline of the land;
- includes the Right of Way as part of a transit-oriented development plan, dedicated rapid transit lane, or transit corridor;

- would materially increase the SFPUC's potential liability or diminish the security of the SFPUC's facilities;
- would make it unsafe for SFPUC employees, equipment, and vehicles to access or maintain a SFPUC facility by reducing the clearances to the SFPUC facility. (An example is a road that is proposed too close to SFPUC infrastructure for SFPUC employees to work safely.); or
- is inconsistent with any existing or future SFPUC policies, as they may be amended or modified from time to time.

2.2
(cont.)

SFPUC Project Review Process

Proposed projects and other activities on any SFPUC property or easement must undergo the Project Review Process if the project will include construction; digging or earth moving; clearing; installation; the use of hazardous materials; other disturbance to right of way resources; or the issuance of new or revised leases, licenses and permits. This review is done by the SFPUC's Project Review Committee (Committee).

In reviewing a proposed project, the Committee may conclude that modifications or avoidance and minimization measures are necessary. Large and/or complex projects may require several project review sessions to review the project at significant planning and design stages.

To initiate the Project Review process, please fill out a Project Review application at Project Review and Land Use - Bay Area (sfpuc.gov). The project will be scheduled for the next available Project Review meeting.

2.3

Please let me know if you have any further questions. Thanks.

Sincerely,

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

cell: [REDACTED]
[REDACTED]



From: Wu, Elton H <[REDACTED]>
Sent: Monday, July 21, 2025 3:22 PM
To: Anderson, Eric B.
Cc: Wilson, Joanne; Read, Emily; Leung, Tracy; Feng, Stacie; RES; Rodgers, Heather
Subject: NOP to the R-3 Zoning District Update EIR- Public Notice
Attachments: City of Mountain View.pdf

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

cell: [REDACTED]
[REDACTED]



2.4



Legend



City Boundary



SFPUC Pipelines



SFPUC Parcels (Fee Owned)



SFPUC Parcels (Easement / Road)



**Hetch Hetchy
Regional Water System**
San Francisco Public Utilities Commission
Real Estate Services

SFPUC Right of Way City of Mountain View

The City does not guarantee that the information is accurate or complete. The City is not responsible for any damages arising from the use of data. Users should verify the information before making project commitments.



Scale 1:44,487



Letter 2

Commenter: Elton Wu, Environmental Compliance and Land Planner, San Francisco Public Utilities Commission (SFPUC)

Date: June 18, 2026

Response 2.1

The Draft EIR evaluates utility infrastructure and service system impacts in Section 4.15, *Utilities and Service Systems*. The R3 Zoning District Update does not authorize specific development on SFPUC property, nor does it approve any specific construction activities. Future development proposals occurring on or adjacent to SFPUC property would be required to comply with applicable SFPUC requirements and obtain any permits or approvals required by SFPUC. The comment does not identify a deficiency in the environmental analysis contained in the Draft EIR. Therefore, no revisions to the Draft EIR are required in response to this comment.

Response 2.2

The City acknowledges the comment and appreciates the information regarding SFPUC's policies governing the use of its property and utility corridors. The restrictions identified by the commenter would apply, as appropriate, to future activities occurring on SFPUC-owned property or within SFPUC easements. The comment provides information regarding SFPUC operational requirements but does not identify a deficiency in the Draft EIR's environmental analysis. Therefore, no revisions to the Draft EIR are required in response to this comment.

Response 2.3

The information provided regarding SFPUC's project review procedures and permitting requirements will be considered during implementation of the Proposed Project, as appropriate. Future development projects proposed on or adjacent to SFPUC facilities would be responsible for complying with applicable SFPUC review and permitting requirements. The comment does not identify an inadequacy in the environmental analysis presented in the Draft EIR. Therefore, no revisions to the Draft EIR are required in response to this comment.

Response 2.4

As described in Section 1, *Introduction*, of the Draft EIR, comments received during the NOP process were considered in determining the scope and content of the environmental analysis. Within that section, Table 1-1, *NOP Comments and EIR Response*, summarizes comments received during NOP review and identifies where those comments were addressed in the Draft EIR. The commenter's NOP comments are specifically summarized and referenced within the Draft EIR Section 4.15, *Utilities and Service Systems*. Accordingly, the issues raised during the NOP process were considered during preparation of the Draft EIR. No revisions to the Draft EIR are required in response to this comment.



District Office
T 650.526.3500
1400 Montecito Ave.
Mountain View, CA 94043

June 22, 2026

Kimbra McCarthy
City of Mountain View
500 Castro Street
Mountain View, CA 94041

Re: R3 Zoning District Update and Impacts on School Facilities

Dear Ms. McCarthy,

On behalf of the Mountain View Whisman School District, I am writing to express our appreciation for the City's continued work to address housing needs in Mountain View. The District recognizes the importance of creating additional housing opportunities, including more diverse housing types, middle-income ownership opportunities, and affordable housing.

3.1

At the same time, the District is concerned about the significant impact increased residential density will have on school facilities, school operations, and the District's ability to serve future students. As residential density increases, additional students will reside within our attendance boundaries. These students will need classrooms, instructional spaces, outdoor play areas, student support spaces, special education facilities, meal service, and safe routes to school.

This concern is particularly important because the City's R3 Zoning and related precise plan areas include a significant portion of the City's existing residential units. The City's proposed update would allow substantial additional residential development over time. While the District supports the City's housing goals, the cumulative effect of thousands of new residential units may create long-term school facility needs that the District cannot address through existing school sites or the limited "developer fees" the District would be permitted to assess.

3.2

The District respectfully requests that the City expressly evaluate and address school facility impacts as part of its R3 zoning update and related environmental review. This should include the potential need for future school facilities or land. Because school planning requires long lead times, early coordination is essential to avoid creating a

future mismatch between residential growth and public school capacity.

3.2
(cont.)

The District also requests that the City consider mechanisms to support school facility planning as housing density increases. This may include ongoing coordination between City and District staff and identification of opportunities for school-related public infrastructure where appropriate.

Mountain View Whisman School District values its partnership with the City of Mountain View. We share the City's commitment to a vibrant, inclusive, and sustainable community. Housing and schools are both essential public infrastructure, and successful long-term planning requires that they be considered together. We respectfully ask that as the City advances the R3 zoning update, it also work closely with the District to ensure that residential growth is accompanied by thoughtful school planning for the students and families who will live in these new homes.

3.3

We look forward to working collaboratively with the City to support affordable housing while also protecting the District's ability to provide high-quality educational facilities and services for current and future Mountain View students.

Sincerely,



Jeff Baier
Superintendent
Mountain View Whisman School District

Letter 3

Commenter: Jeff Baier, Superintendent, Mountain View Whisman School District

Date: June 22, 2026

Response 3.1

The potential effects of future population growth on school facilities are evaluated in Section 4.12, *Public Services and Recreation*, of the Draft EIR. The EIR specifically recognizes that implementation of the Proposed Project would increase the City's population, including that of school-aged children, and evaluates the corresponding effects on the Mountain View Whisman School District, Los Altos School District, and Mountain View-Los Altos Union High School District. As discussed on pages 4.12-14 through 4.12-17 of the Draft EIR, student generation associated with the project would be accommodated through existing statutory school impact fee requirements and other applicable mechanisms, and therefore, the impact would be less than significant.

The Draft EIR further estimates the number of students that could be generated by project buildout and evaluates those students' potential effects on local school districts in Section 4.12, *Public Services and Recreation*, within Table 4.12-3. The analysis notes that future growth would occur incrementally over time through individual development projects. Future projects facilitated by the proposed Zoning Update would be subject to City review and would be required to pay applicable statutory school impact fees in accordance with State law. In addition, future projects may undergo additional environmental review, as appropriate, based on the nature and characteristics of the proposed development.

Accordingly, the Draft EIR evaluates the potential effects of project-related growth on school facilities and concludes impacts would be less than significant. No revisions to the Draft EIR are required in response to this comment.

Response 3.2

The Draft EIR evaluates the potential effects of project-related growth on school facilities in Section 4.12, *Public Services and Recreation*. The EIR estimates that implementation of the project could generate approximately 3,532 students across Mountain View Whisman School District, Los Altos School District, and Mountain View-Los Altos Union High School District at maximum buildout and evaluates the ability of the affected school districts to accommodate projected enrollment growth. The Draft EIR notes that school districts periodically prepare facility plans and may expand or modify school facilities as needed to accommodate future enrollment. The Mountain View Whisman School District's letter, however, does not identify which school sites may need to be expanded or modified or where new school sites could be needed to accommodate the potential growth in student numbers across the District resulting from the Project. The City expects that as future development proceeds under the proposed rezoning, the City and the District will continue their cooperation to identify and plan for new or modified school facilities.

The Draft EIR further explains that California law provides a specific framework for addressing school facility impacts associated with new development. Pursuant to Government Code Section 65995, "the payment of a fee, charge, dedication, or other requirement levied or imposed pursuant to Section 17620 of the Education Code is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act ... on the provision of adequate school facilities." This statutory provision limits the scope of CEQA review related to school facility impacts and establishes statutory school impact fees as full mitigation for school facility impacts under CEQA. Consistent with this requirement, *CEQA Guidelines* Section 15193(a) provides that school impacts shall not be considered significant environmental effects where the school district can impose school facility fees pursuant to State law.

Consistent with these legal requirements, the Draft EIR evaluates projected student generation, identifies the affected school districts, and concludes that impacts would be less than significant because future development would be subject to the statutory fee mechanisms established by State law. Accordingly,

the Draft EIR contains the analysis required by CEQA regarding school facility impacts. No revisions to the Draft EIR are required in response to this comment.

Response 3.3

The Draft EIR recognizes that implementation of the project would occur incrementally over many years and that future population growth would occur gradually through individual development projects. The City acknowledges the comment and agrees that continued coordination between public agencies can assist long-range planning efforts. The comment does not contain a substantive comment on the Draft EIR. Accordingly, no revisions to the Draft EIR are required in response to this comment.

June 22, 2026

Eric Anderson, Planning Manager
City of Mountain View
Community Development Department
500 Castro Street, P.O. Box 7540
Mountain View, CA 94041-7540

Re: Comments on the R3 Zoning District Update Draft Environmental Impact Report

Dear Eric:

Thank you for allowing the City of Sunnyvale to review and provide comments on the R3 Zoning District Update Draft Environment Impact Report (DEIR) in the City of Mountain View. Comments concerning the Transportation related analysis of the project are as follows:

In the Transportation Impact Analysis Report (Appendix C), it was stated that the proposed R3 Zoning District update would increase the overall development capacity from approximately 2,000–3,500 dwelling units to between 10,000 and 16,000 dwelling units. Based on this increase in development potential, the project appears likely to trigger requirements under the Congestion Management Program (CMP), which would typically necessitate preparation of a Transportation Analysis (TA). However, a TA was not included as part of the Draft Environmental Impact Report (DEIR).

4.1

The City of Sunnyvale requests that a Transportation Analysis be prepared and that intersections within the City of Sunnyvale be included in future project-level transportation reviews when individual development sites are proposed and the applicable CMP thresholds are met.

For future development applications that trigger CMP requirements, although intersection Level of Service (LOS) analysis is no longer required under CEQA, the City of Sunnyvale requests that the City of Mountain View evaluate intersection operations within Sunnyvale using the methodologies and significance criteria contained in the VTA Transportation Analysis (TA) Guidelines and Transportation Operations Analysis (TOA) Guidelines. Consistent with these guidelines, City of Sunnyvale intersections, as well as CMP intersections, that would receive ten (10) or more project trips per lane on any intersection movement should be evaluated.

4.2

The City requests that all intersections within Sunnyvale that meet the threshold of ten (10) or more project trips per lane on any movement be included in the transportation analysis.

4.2
(cont.)

Traffic operations analyses for the study intersections should be conducted during the weekday AM peak period (7:00 a.m. to 10:00 a.m.) and PM peak period (4:00 p.m. to 7:00 p.m.) and should evaluate existing, background, and cumulative

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 financial contributions towards the implementation of these improvements to bring the roadways back to acceptable or no-project operational level of service. Please discuss with City of Sunnyvale in the identification of improvements prior to finalizing the TA.

4.3

We truly appreciate your consideration of our comments in this matter. 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, P.E.
Principal Transportation Engineer
Division of Transportation and Traffic
Department of Public Work

Cc: Angela Obeso, Transportation and Traffic Manager

Letter 4

Commenter: Lillian Tsang, P.E, Principal Transportation Engineer, City of Sunnyvale Division of Transportation and Traffic

Date: June 22, 2026

Response 4.1

Transportation impacts associated with the Proposed Project are evaluated in Section 4.13, *Transportation*, and Appendix C, *Transportation Impact Analysis*, of the Draft EIR. The transportation analysis evaluates project-related transportation impacts consistent with CEQA requirements and applicable transportation planning guidance. The project is a program-level zoning update and does not approve specific development projects. The transportation analysis was prepared consistent with *CEQA Guidelines* Section 15064.3, which identifies vehicle miles traveled as the primary measure of transportation impacts under CEQA. Future development facilitated by the project would be subject to applicable transportation review requirements, including any review procedures required by local, regional, or countywide agencies at the time individual projects are proposed.

No revisions to the Draft EIR are required in response to this comment.

Response 4.2

The Draft EIR evaluates transportation impacts using the methodology required under CEQA in Section 4.13, *Transportation*, of the Draft EIR. Senate Bill 743 and *CEQA Guidelines* Section 15064.3 establish vehicle miles traveled as the appropriate measure of transportation impacts under CEQA and eliminate automobile delay and level of service as a basis for determining significant transportation impacts under CEQA. Accordingly, the Draft EIR evaluates transportation impacts using a VMT-based methodology and concludes that the project would not result in a significant transportation impact, while identifying a significant and unavoidable cumulative VMT impact associated with regional growth.

The VTA Transportation Analysis and Transportation Operations Analysis Guidelines referenced by the commenter have not been substantively updated since Senate Bill 743 to align with CEQA requirements. The Guidelines include procedures used for local transportation planning, operations analyses, and Congestion Management Program purposes. However, because level-of-service (LOS) and related intersection operations metrics are no longer CEQA impact thresholds for land use projects, the Draft EIR was not required to evaluate transportation impacts using those methodologies for purposes of determining significance under CEQA. The City therefore evaluated transportation impacts using the CEQA-required VMT framework rather than LOS-based CMP methodologies.

Future development projects facilitated by the proposed zoning update may be subject to additional transportation review requirements imposed by the City, VTA, Sunnyvale, Santa Clara County, or other agencies with jurisdiction at the time such projects are proposed. Any applicable CMP, operational, or intersection analyses required outside the CEQA process would be addressed through those future review procedures, as appropriate.

Accordingly, no revisions to the Draft EIR are required in response to this comment.

Response 4.3

See Responses 4.1 and 4.2, above, which explain that the Proposed Project is a program-level zoning update that does not approve specific development projects or transportation improvements. As discussed in Section 1, *Introduction*, of the Draft EIR, the document provides a citywide assessment of environmental impacts and serves as a first-tier environmental document for future development projects. Future development proposals facilitated by the project may be subject to additional transportation review, permitting requirements, infrastructure improvement obligations, and agency

coordination, as appropriate, based on the characteristics of the individual project and applicable requirements in effect at that time.

The Draft EIR evaluates cumulative transportation impacts in Section 4.13.4, *Transportation Cumulative Impacts*. The cumulative analysis considers regional growth projections and concludes that development would not result in a cumulatively significant conflict with applicable circulation plans, policies, or programs and would not create cumulatively significant transportation safety hazards or inadequate emergency access. However, the Draft EIR concluded that cumulative development would result in a significant and unavoidable increase in VMT and that the project's contribution to that cumulative VMT impact would be cumulatively considerable with no feasible mitigation to reduce impacts.

The City appreciates Sunnyvale's interest in continued coordination regarding transportation issues associated with future development. Future projects may be subject to additional transportation studies, infrastructure improvement requirements, and coordination with affected agencies, including the City of Sunnyvale, as appropriate. No revisions to the Draft EIR are required in response to this comment.



PLANNING & DEVELOPMENT SERVICES

CITY OF
**PALO
ALTO** 250 Hamilton Avenue, 5th Floor
Palo Alto, CA 94301
(650) 329-2441

June 29, 2026

Eric Anderson, Planning Manager
City of Mountain View
500 Castro Street, PO Box 7540
Mountain View, CA 94039-7540
E-mail: [REDACTED]

RE: Notice of Availability of a Draft EIR for Mountain View's R3 Multifamily Residential Zoning Update

Thank you for including the City of Palo Alto in the environmental review process for the above-referenced project.

Project Understanding

The City of Mountain View is seeking to update their City's General Plan, Zoning Code, Zoning Map, and various Precise Plans in order to increase feasibility of multi-family housing production, identify areas where multi-family housing should be located, and create development standards for multi-family housing. The project would help align the City of Mountain View with state law, create opportunities for diverse housing types and neighborhood serving uses, encourage parcel aggregation, and improve design.

The proposed project, if fully built out, would result in an estimated 10,000-16,000 additional residential units with the possibility of additional 8,800-14,800 units beyond the current capacity in Mountain View. When combined with the existing 2025 population of 86,513, the total population of Mountain View in 2050 would be 177,800 persons in 2050.

Biological Resources

- While the Draft EIR mentions "standard conditions of approval" for bird-strike plans, the City of Palo Alto would recommend also referencing the bird-safe glass design requirements that the City of Mountain View adopted through its building code update in 2025.

Transportation

- The Draft EIR acknowledges that the project would create cumulative development that would result in a significant and unavoidable increase in VMT. Accordingly, cumulative transportation impacts related to VMT would be significant and unavoidable, and the contribution of the Project would be cumulatively considerable. However, no mitigation measures are proposed to reduce this impact. Mountain View is obligated to consider and implement feasible mitigation measures that may reduce this impact even if they do not reduce the impact to a less than significant impact.
- Cross-Boundary Transportation Impacts on San Antonio Corridor
 - The R3 Zoning Update identifies 14 areas proposed for intensification, several of which may be directly relevant to Palo Alto. Of particular concern are Change Areas 1–3, which are located in proximity to shared boundary corridors. The traffic growth from these parcels may directly affect Palo Alto intersections.
 - The City of Palo Alto requests that Mountain View run transportation modeling for the San Antonio Road corridor, with special attention to the CMP intersections. This analysis may be conducted as part of the Mountain View R3 Zoning Update EIR process. Alternatively

the City of Mountain View may contribute funds to the City of Palo Alto to cover the cost of running these modeling assumptions under the San Antonio Road Area Plan effort currently underway in Palo Alto.

5.4
(cont.)

- CMP Compliance Level of Service Analysis

- The transportation analysis (Appendix C of the Draft EIR) does not include Level of Service (LOS) analysis for Congestion Management Program (CMP) intersections, as required by the VTA Traffic Operations Analysis Guidelines (Updated October 2024). While not required under CEQA, the VTA guidelines require that projects evaluated under the CMP analyze impacts at CMP intersections using the HCM 7th Edition operational methodology and VISTRO software. Please include the City of Palo Alto in the distribution of the transportation analysis once this is included.
- Given the scale of this project and the density of intensification proposed across 14 change areas, the CMP intersections within or adjacent to Palo Alto that could be impacted include:
 - El Camino Real / Charleston Road
 - San Antonio Road / Charleston Road
 - San Antonio Road / Middlefield Road

5.5

- Transit Capacity Analysis

- The VTA CMP Guidelines require that traffic analysis include an evaluation of transit facilities, specifically: transit service availability, transit capacity relative to increased demand, the impact of increased traffic delays on transit service, and the need for transit access improvements.
- The Transportation Analysis states that higher residential capacity near transit corridors will increase transit demand, and references VTA's Title VI service standards as the mechanism for adjusting service levels. This does not quantify anticipated increases in transit demand resulting from the proposed upzoning, nor does it assess the impact of increased traffic delays on transit service. For example, if the project increases traffic delays, queue jump lanes or transit signal priority may be needed to maintain transit service levels. The City of Palo Alto recommends that Mountain View coordinate directly with VTA on this matter to assess whether service and/or infrastructure adjustments will be needed to accommodate the projected growth.

5.6

Land Use

- While statements regarding impacts to Mountain View neighborhoods appear to be accurate, there is no discussion of impacts to neighborhoods immediately adjacent to these zones within the City of Palo Alto. Impacts to the largely single-family residential neighborhood of Monroe Park should be examined.
- The DEIR lists three projects in the City of Palo Alto which were included in the cumulative analysis; instead of doing project by project on the corridor, we would suggest the DEIR focus on capacity created through Palo Alto's 2023-2031 Housing Element, and other efforts such as the Housing Incentive Program expansion (the EIR for which evaluated an increase in 818 units on the San Antonio corridor). Should the City of Mountain View choose not to utilize that approved EIR as part of their baseline (which is what the City of Palo Alto has been using for the buildout of the corridor (including 762, 788, 800-808, and 824 San Antonio Road) then at minimum the DEIR should include the approved project at 800 San Antonio Road (75 units) in addition to the listed projects.
- The City of Palo Alto is also currently in the process of increasing the housing capacity along the portion of San Antonio Road within the Palo Alto City limits. Has that project been considered under the cumulative impacts?

5.7

5.8

Ravenswood Business District/4 Corners Specific Plan Update EIR Notice of Availability Comments

Page 3 of 3

- Two corrections: 824 San Antonio Road is approved, not under review. And 762 San Antonio Road has a unit count of 228 units, not 198 units.

5.8 cont

Public Services

- In reviewing Impact PS-1 of the Draft EIR, there is a statement that the project would not require new or expanded fire protection facilities. However, does the City of Mountain View anticipate the need for CPAU fire hydrants to be installed for fire protection along the shared municipal boundary lines?

5.9

Should you have any questions regarding this letter and the City's comment, please contact me at

████████████████████ or ██████████.

Sincerely,

Robert Cain
Principal Planner, Planning and Development Services Division

Letter 5

Commenter: Shree Dharasker, Associate Engineer Civil, Valley Water

Date: June 25, 2026

Response 5.1

Future development projects facilitated by the proposed zoning update would be required to obtain all applicable permits and approvals from Valley Water and other responsible agencies, as appropriate. The Proposed Project does not approve specific development projects or authorize work within Valley Water facilities or rights-of-way. The comment does not identify a deficiency in the environmental analysis contained in the Draft EIR. Therefore, no revisions to the Draft EIR are required in response to this comment.

Response 5.2

The following revisions were made to page 4.15-2 of the Draft EIR in response to this comment:

Valley Water's water supply is comprised of several sources, including the State Water Project (SWP), Central Valley Project (CVP), local surface water, recycled water, natural groundwater recharge, a ~~s~~Semitropic ~~g~~Groundwater bank, local reservoirs, and groundwater storage.

This addition to the Draft EIR provides clarifying information but does not identify a new environmental impact or change the significance findings or impact analysis of the Draft EIR.

Response 5.3

The following revisions were made to page 4.15-2 of the Draft EIR:

In addition to the water supplied by the SWP and CVP, Valley Water manages 10 reservoirs across Santa Clara County with a combined storage capacity of approximately 166,000 AF. These reservoirs capture local watershed runoff, which is gradually released throughout the year to support groundwater recharge. In addition, water from Anderson, Coyote, Almaden, and Calero Reservoirs can be directed to Valley Water's treatment plants for potable use. Operational restrictions have been imposed on Almaden, Calero, Coyote, and Guadalupe Reservoirs. As a result, the combined storage capacity available within Valley Water's reservoir system is currently limited to approximately 63,000 total AF per year. Valley Water incorporates these operational constraints into its long-term water supply planning and reliability assessments. Currently, Anderson Reservoir is offline due to a seismic retrofit project, with completion anticipated by 2030. Valley Water has rights to capture and use 223,000 AFY of the water captured at these reservoirs and diversion structures. On average, 53,000 AFY are currently used for Valley Water's supplies, though this is expected to increase to an average of 83,000 AFY by 2040 (Valley Water 2021).

This addition to the Draft EIR provides clarifying information but does not identify a new environmental impact or change the significance findings or impact analysis of the Draft EIR.

Response 5.4

The following revisions were made to page 4.15-3 and 4.15-4 of the Draft EIR:

Demand Management and Water Conservation

Mountain View's Water Conservation Program, developed in collaboration with Valley Water and the Bay Area Water Supply and Conservation Agency, encompasses a wide range of water use efficiency initiatives aimed at conserving water and enhancing drought resilience. These efforts include rebate

programs for high-efficiency appliances and fixtures, smart irrigation controllers, and lawn-to-garden conversions. The City also supports educational initiatives such as landscape classes, school outreach, and public events to promote conservation awareness.

The Water Conservation program includes ordinances to prevent water waste, metering of all potable water connections, conservation-oriented pricing, and advanced metering infrastructure initiatives. Demand Management Measures implemented by the City include Water-Wise House The City of Mountain View R3 Zoning District Update 4.15-4 Calls, landscape water budget reports, leak detection notifications, and participation in Valley Water's Water-Efficient Technology (WET) rebate program. Mountain View has achieved a 23 percent reduction in per capita water use compared to its 2020 target by implementing and sustaining these efforts (City of Mountain View 2021a).

In addition to these efforts, Valley Water prepares and periodically updates long-range water supply planning documents to ensure reliable water supplies for Santa Clara County. Valley Water's Water Supply Master Plan 2050 establishes strategies for meeting future water demands through a diversified portfolio of imported water, local water resources, recycled water, groundwater management, and conservation programs. The Water Supply Master Plan 2050 includes a countywide water conservation goal of achieving 126,000 acre-feet per year of water savings by 2050 through continued implementation of water use efficiency and conservation measures.

The following revisions were made to the Regulatory Setting on page 4.15-9 of the Draft EIR:

Valley Water Water Supply Master Plan 2050

The Water Supply Master Plan 2050, adopted by Valley Water in November 2025, is the agency's long-range planning document for ensuring reliable water supplies in Santa Clara County through 2050. The Water Supply Master Plan evaluates projected future water demands, available water supplies, and infrastructure needs and identifies investment strategies intended to maintain Valley Water's level-of-service goal of meeting 100 percent of annual water demand during normal years and at least 80 percent of demand during drought years. The plan addresses challenges associated with climate change, drought, uncertainty in future water demands, and long-term water supply reliability through an adaptive management framework. Recommended strategies include development of local drought-resilient water supplies, expansion of water supply and storage projects, continued maintenance and modernization of existing infrastructure, groundwater management, recycled and purified water projects, and water conservation programs. The Water Supply Master Plan also establishes a countywide water conservation target of achieving approximately 126,000 acre-feet per year of water savings by 2050 through continued implementation of water-use efficiency measures. The City's water supply planning efforts are informed by Valley Water's long-range water supply planning framework.

These additions to the Draft EIR provide clarifying information but do not identify a new environmental impact or change the significance findings or impact analysis of the Draft EIR..

Response 5.5

Water supply impacts are evaluated in Section 4.15, *Utilities and Service Systems*. Future development projects facilitated by the proposed zoning update would be subject to all applicable State and local requirements in effect at the time such projects are proposed, including any requirements related to Water Supply Assessments under Senate Bill 610. Whether a future project requires preparation of a WSA would be determined based on the characteristics of the proposed development and the applicable legal requirements at that time. No revisions to the Draft EIR are required in response to this comment.

Response 5.6

Groundwater resources, groundwater quality, and construction-related water quality impacts are evaluated in Sections 4.8, *Hydrology and Water Quality*, and 4.7, *Hazards and Hazardous Materials*, of the Draft EIR. Future development projects would be required to comply with applicable federal, State, and local regulations, such as the City's Stormwater Management Ordinance, Stormwater Quality Guidelines, and Low Impact Development (LID) requirements, which govern groundwater protection, hazardous materials management, construction activities, and stormwater quality. Site-specific groundwater conditions would be evaluated during future project review, as appropriate. No revisions to the Draft EIR are required in response to this comment.

Response 5.7

Future development projects facilitated by the proposed zoning update would be subject to applicable engineering, building, environmental health, groundwater protection, and permitting requirements. These requirements include compliance with the California Building Code and California Plumbing Code, Valley Water's well permitting and groundwater protection requirements, and applicable City grading, stormwater management, and development requirements, including compliance with the City's Stormwater Quality Guidelines and Low Impact Development (LID) standards, as discussed in Section 4.8, *Hydrology and Water Quality*, of the Draft EIR.

The Draft EIR evaluates groundwater quality impacts at a programmatic level appropriate for the proposed zoning update and concludes that impacts would be less than significant. Any site-specific groundwater protection measures would be addressed during review of future development proposals, as appropriate. No revisions to the Draft EIR are required in response to this comment.

Response 5.8

Future development projects would be required to comply with applicable Valley Water, Santa Clara County, and State requirements governing the destruction of abandoned wells. Future development projects involving groundwater wells would be required to comply with applicable Valley Water permit and inspection requirements, as well as other applicable federal, State, and local regulations. The Proposed Project does not approve any specific wells or groundwater extraction activities. No revisions to the Draft EIR are required in response to this comment.

Letter 6

From: Shree Dharasker <[REDACTED]>
Sent: Thursday, June 25, 2026 5:54 PM
To: Anderson, Eric B. <[REDACTED]>
Subject: RE: Notice of Availability - Draft Environmental Impact Report - R3 Zoning District Update

Hi Eric,

The Santa Clara Valley Water District (Valley Water) has reviewed the draft programmatic Environmental Impact Report (EIR) for the R3 Zoning District Update Project, received on May 15, 2026, and has the following comments:

1) Permits

- a. Within the proposed R3 Zoning District, Valley Water has right of way on Stevens and Permanente Creeks and pipelines. Any work within or adjacent to Valley Water right of way will need an encroachment permit in accordance with Valley Water's [Water Resources Protection Ordinance](#). Any construction adjacent to any creeks or waterways must follow [the Guidelines and Standards for Land Use Near Streams](#). Detailed plans are needed for any work on Valley Water right of way.

6.1

2) Utilities and Service Systems (Section 4.15)

- a. "Semitropic" is the name of the groundwater bank and should be capitalized. More info: <http://www.semitropic.com/groundwaterbanking.htm>
- b. Almaden, Calero, Coyote, and Guadalupe Reservoirs also have imposed restrictions, limiting total capacity of all 10 reservoirs to about 63 TAF.
- c. Valley Water now has a new water conservation goal to achieve 126,000 AFY in water savings by 2050. See Valley Water's Water Supply Master Plan 2050 for more information.

6.2

6.3

6.4

3) Water Supply and Demand

- a. Given the large size (~8,350 parcels and over 1,260 acres) of the proposed R3 Zoning District and potential 10,000 to 16,000 additional residential units through the year 2050, we strongly recommend a Water Supply Assessment (WSA) at the appropriate time with estimates of total annual water demand and water supply sources for any proposed development project. As the Groundwater Sustainability Agency (GSA) under the Sustainable Groundwater Management Act (SGMA) of 2014, Valley Water uses WSAs to help support the management and long-term sustainability of groundwater resources throughout Santa Clara County.

6.5

4) Protection of Groundwater

- a. The proposed R3 Zoning District has relatively shallow groundwater. Valley Water's Historical Groundwater Elevation Data web tool (<https://gis.valleywater.org/Wells.html>) shows generalized depths to first groundwater that range from about 30 ft below ground surface (bgs) to greater than 100 ft bgs in the southern Zoning area to 0-20 ft bgs in the northern Zoning area. Shallow groundwater is highly vulnerable to contamination from land surface activities (e.g., industrial and commercial development, construction and dewatering, and current/historical contamination sites) and seawater intrusion near the bay, and such conditions should be carefully evaluated and considered in future developments and construction design to ensure that groundwater quality is not adversely impacted.

6.6

- b. Infrastructure and construction features such as deep piers, foundation piles, and water wells can act as conduits or preferential pathways for the contamination of deeper principal aquifers (150 ft or greater, bgs) that serve as drinking water sources for the region. Such infrastructure as part of current/future development should be evaluated carefully utilizing proper construction design to ensure that the groundwater quality in principal aquifers is not adversely impacted.

6.7

5) Active, New, or Abandoned Wells

- a. Any abandoned, unused, or unregistered wells identified during project planning or construction must be properly destroyed. Any active wells or newly proposed wells located in the R3 Zoning District area as part of development activities must be properly constructed and adhere to proper oversight via Valley Water's well permitting and Inspection process to ensure protection of groundwater quality and the region's water resources. For more information, contact Valley Water's Well Permitting and Inspection Hotline at (408) 630-2660, or visit:
<https://www.valleywater.org/contractors/doing-businesses-with-the-district/wells-well-owners>.

6.8

Please contact me if you have any questions,

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

Letter 6

Commenter: Robert Cain, Principal Planner, City of Palo Alto Planning and Development Services Division

Date: June 29, 2026

Response 6.1

The City acknowledges the comment. The comment accurately summarizes portions of the Proposed Project and does not raise a concern regarding the adequacy of the environmental analysis contained in the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

Response 6.2

The Draft EIR evaluates impacts to biological resources in Section 4.3, *Biological Resources*, and identifies applicable regulatory requirements and mitigation measures intended to reduce impacts to sensitive biological resources. The City agrees that referencing the City's bird-safe building requirements would provide additional regulatory context. Accordingly, the following addition was made to page 4.4-17 of the Draft EIR:

City of Mountain View Bird-Safe Building Standards

In 2025, the City of Mountain View adopted bird-safe building design requirements as part of its Building Code update. These requirements are intended to reduce bird collisions with glass and other building features by incorporating bird-safe design principles into new development and qualifying building modifications. The standards generally require the use of bird-safe glazing treatments or materials in areas of buildings that present a heightened risk of bird strikes and encourage building designs that minimize hazardous reflections and visual transparency. Applicable development projects are required to demonstrate compliance with the City's bird-safe building standards during building permit review. These standards are intended to reduce adverse effects on migratory birds and other avian species that may occur in urbanized environments.

This addition to the Draft EIR provides clarifying information but does not identify a new environmental impact or change the significance findings or impact analysis of the Draft EIR.

Response 6.3

As discussed in Section 4.13, *Transportation*, and Impact TRA-C-1, the Draft EIR concludes that cumulative development would result in a significant and unavoidable cumulative VMT impact and that the project's contribution to that impact would be cumulatively considerable. The City agrees that feasible measures to reduce VMT should be considered where available.

As described in the Transportation Analysis prepared by Fehr & Peers (Appendix C of the Draft EIR), the cumulative VMT analysis includes consideration of a cumulative VMT reduction strategy that is consistent with the City's existing VMT framework. The strategy identifies measures that can reduce per-capita VMT over time, including promoting higher-density and mixed-use development patterns, encouraging affordable housing near employment centers, enhancing multimodal transportation infrastructure, implementing parking management measures, and utilizing transportation demand management programs such as transit subsidies, carpool incentives, bicycle facilities, and other strategies intended to reduce reliance on single-occupancy vehicle travel.

However, these measures are not project-specific mitigation measures that can feasibly be imposed on the proposed Zoning Update under CEQA. Rather, they are broader policy tools and planning strategies that require implementation over time through citywide programs, future development projects, coordination with transportation providers, and long-term infrastructure investments. As discussed in

Appendix C of the Draft EIR, there are also substantial uncertainties regarding the timing and location of future development, future travel behavior, evolving transportation technologies, regional infrastructure improvements, and future mobility patterns. Because of these uncertainties, it is not possible to determine with certainty the extent to which such measures would reduce cumulative VMT attributable to future development facilitated by the project.

Accordingly, while the City recognizes that these strategies may contribute to reductions in per-capita VMT over time, no feasible project-level mitigation measures were identified that would reduce the project's cumulatively considerable contribution to cumulative VMT impacts to a less-than-significant level. Therefore, Impact TRA-C-1 remains significant and unavoidable, and no revisions to the Draft EIR are required in response to this comment.

Response 6.4

Transportation impacts are evaluated in Section 4.13, *Transportation*, and Appendix C, *Transportation Impact Analysis*, of the Draft EIR. Pursuant to Senate Bill 743 and *CEQA Guidelines* Section 15064.3, VMT, rather than automobile delay, LOS, or intersection operations, is the appropriate measure of transportation impacts under CEQA. Accordingly, the Draft EIR evaluates transportation impacts using a VMT-based methodology consistent with current CEQA requirements.

Because the project is a program-level zoning update and transportation impacts are evaluated using a VMT framework, the Draft EIR is not required to analyze LOS or operational conditions at specific intersections within Palo Alto or along the San Antonio Road corridor to determine the significance of congestion or capacity-related transportation impacts under CEQA.

In addition, as described in Sections 1.3 and 2.3 of the Draft EIR, the Proposed Project is a program-level zoning update that does not approve specific development projects, site plans, circulation improvements, or roadway modifications. The location, timing, intensity, and transportation characteristics of future redevelopment projects that may occur under the updated zoning standards are currently unknown. As a result, detailed project-level intersection analyses for specific facilities located within neighboring jurisdictions would be speculative and are not required for this programmatic EIR. Future development proposals facilitated by the project may be subject to additional transportation review requirements imposed by the City, VTA, Palo Alto, or other responsible agencies, as appropriate, based on the characteristics of the proposed development and the requirements in effect at the time of review.

Accordingly, no revisions to the Draft EIR are required in response to this comment.

Response 6.5

As discussed above in Response 6.4, *CEQA Guidelines* Section 15064.3 requires evaluation of transportation impacts using a VMT-based methodology. Automobile delay and level-of-service are no longer transportation impact thresholds under CEQA for land use projects. Accordingly, the Draft EIR evaluates transportation impacts using VMT rather than CMP level-of-service methodologies. *CEQA Guidelines* Section 15064.3 expressly provides that, except for roadway capacity projects, vehicle delay generally does not constitute a significant environmental impact under CEQA. Therefore, the Draft EIR is not required to evaluate LOS conditions at specific CMP intersections as a basis for determining transportation impact significance.

In addition, as discussed in Response 6.4, the Proposed Project is a program-level zoning update that does not approve specific development proposals, transportation improvements, or site plans. Because the timing, location, intensity, and transportation characteristics of future redevelopment projects are presently unknown, detailed operational analyses of specific intersections within Palo Alto or elsewhere outside the project area would be speculative and are not required for a programmatic CEQA analysis.

Future development proposals facilitated by the proposed Zoning Update may be subject to additional transportation review requirements imposed by the City, VTA, Palo Alto, or other agencies with jurisdiction, as appropriate, based on the characteristics of the Proposed Project and applicable

requirements at the time of review. Accordingly, no revisions to the Draft EIR are required in response to this comment.

Response 6.6

Existing transit services within Mountain View are described in Section 4.13, *Transportation*. As discussed therein, the project would facilitate infill residential development in locations with access to existing transit service and is expected to reduce citywide VMT relative to existing development patterns. The project does not include physical modifications to transit facilities and would not conflict with adopted transportation plans or policies, pursuant to CEQA. Future transit service planning and transit capacity improvements remain within the jurisdiction of the applicable transit service providers. No revisions to the Draft EIR are required in response to this comment.

Response 6.7

The commenter does not identify specific potential effects on Palo Alto neighborhoods, so it is uncertain what types of concerns for nearby neighborhoods the commenter is referring to. Please refer to Master Response 2, *Compatibility Between Higher-Density Residential Development and Adjacent Single-Family Neighborhoods*. As discussed therein, the Draft EIR evaluates aesthetics impacts in Section 4.1, *Aesthetics*, including impacts related to visual character, public views, building massing, building height, and light and glare. The Draft EIR concludes under Impact AES-3 that while the project would facilitate increases in residential density, massing, and building height, the project includes objective form-based development standards and would remain subject to applicable General Plan policies, City Code requirements, and design standards that address visual character and quality. Therefore, impacts to visual character and public views would be less than significant.

The Draft EIR evaluates these issues at the programmatic level appropriate for a citywide zoning update. As discussed in Master Response 2, the Proposed Project does not approve specific development proposals, building locations, site plans, or architectural designs. Consequently, detailed Project-specific analysis of effects on individual neighborhoods or properties is not feasible at this stage and would be speculative.

The Draft EIR also evaluates cumulative aesthetics impacts in Section 4.1.4, *Cumulative Impacts*. The cumulative analysis considers development facilitated by the project in combination with other past, present, and reasonably foreseeable future development within the region. The Draft EIR concludes that cumulative development would not substantially affect scenic vistas, scenic resources, visual character, visual quality, or nighttime lighting conditions. Specifically, the Draft EIR concludes that because development throughout the city would continue to be subject to applicable General Plan policies, zoning regulations, objective development standards, design review requirements, and lighting standards, cumulative impacts related to aesthetics would be less than significant and the Project's contribution would not be cumulatively considerable.

No revisions to the Draft EIR are required in response to this comment.

Response 6.8

Section 3.3, *Cumulative Development*, describes the approach used to evaluate cumulative impacts in the Draft EIR. Table 3-3 identifies the individual cumulative development projects considered as part of the cumulative setting and includes several projects located within the City of Palo Alto.

The following revisions were made to Table 3-1 on page 3-3 of the Draft EIR:

- The proposed 762 San Antonio Road project was revised from a 198-unit rental apartment building to a 228-unit rental apartment building
- 788 San Antonio Road and 800-808 San Antonio Road were added to the table along with their associated jurisdiction, project details, and status.

This addition to the Draft EIR provides clarifying information but does not identify a new environmental impact or change the significance findings or impact analysis of the Draft EIR. The Draft EIR's cumulative impact analysis is not limited to the individual projects identified in Table 3-3. Rather, because this is a program-level EIR, cumulative impacts are evaluated primarily through a broader programmatic lens that considers both identified development projects as well as local and regional growth forecasts, as appropriate for each environmental topic analyzed. As described in Section 3.3, the cumulative analyses rely on a combination of approved and pending development projects, adopted plans, and regional growth projections, including Plan Bay Area 2050, to assess the reasonably foreseeable cumulative environmental effects of future growth.

Therefore, the cumulative impact analysis is intended to evaluate the combined effects of anticipated regional development rather than depend solely on the status or inclusion of any individual project. Accordingly, while Table 3-3 identifies representative cumulative projects used to inform the cumulative setting, the Draft EIR evaluates cumulative impacts at a broader programmatic level consistent with CEQA requirements for a citywide zoning update.

No further revisions to the Draft EIR are required in response to this comment.

Response 6.9

Impacts related to fire protection services are evaluated in Section 4.12, *Public Services and Recreation*. As discussed under Impact PS-1, the Draft EIR concludes that although project implementation would increase demand for fire protection services, the demand would not result in the need for new or expanded fire protection facilities and impacts would be less than significant. The project does not identify or approve specific utility or fire protection infrastructure improvements. Any future development project requiring utility or fire protection infrastructure upgrades would be evaluated through the applicable development review process. Accordingly, no revisions to the Draft EIR are required in response to this comment.

From: [Julie Muir](#)
To: [City Council](#); [Anderson, Eric B.](#)
Subject: public comment on R3 zoning district update, protecting R1 from R3
Date: Sunday, June 28, 2026 9:45:27 PM

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

Dear Mayor and City Council Members and Eric Anderson,

As a resident and owner of an R1 property adjacent to the R3 subdistricts, I am writing to share my concerns regarding the proposed **R3 Zoning District Standards and the associated Draft Environmental Impact Report** and the impact when R1 and R3 are right next to each other. I have been following this process for several years and I consistently ask the council and staff to add protections so that these new developments will not infringe on existing R1 neighborhoods and I still don't see it addressed! While I support the city's goal to "promote vibrant neighborhoods", I believe the current draft needs stronger protections to fulfill **Guiding Principle 4**, which mandates that new buildings "respect the context" and address "character, shadow, privacy and other impacts to surrounding homes".

7.1

First I am requesting that the City provide an **explicit rationale** for the upzoning of the parcels on **Walker Street, between Emily and Linwood**, from the current R3-1h1s (1-story limit) to the high-intensity **R3-C subdistrict**.

7.2

The current proposal for these specific lots creates a fundamental conflict between the City's density mandates and its stated **Guiding Principle 4**, which requires buildings to be "context-sensitive" and address "character, shadow, and privacy". My firm objections are based on the following technical points:

- **Incompatibility of Site Constraints and Density Mandates:** The R3-C subdistrict establishes a **mandatory minimum density of 23.1 units per acre**. However, the lots on Walker Street are physically constrained. Attempting to force "moderate-intensity" building footprints (allowed up to 120' wide and 150' deep) onto these small lots while maintaining the required **10-foot side and rear setbacks** is mathematically and physically improbable.
- **Forced Reliance on "Exceptions to Standards":** Because of these site constraints, developers will be structurally incentivized—or forced—to apply for **Section 36.10.80 Exceptions**. This would allow a **25% reduction of the 10-foot setback**, bringing 3.5-to-6-story buildings within a mere **7.5 feet of R1 property lines**. This is not a "transition"; it is a total removal of the physical buffer necessary to protect the privacy of adjacent single-family homes.
- **Extreme Height Escalation:** The jump from a one-story limit to a **50-foot base height** (3.5 stories) is a drastic shift in character. When coupled with **State Density Bonuses** (potentially pushing heights to 6 stories) and the local **15-foot "Tower Element" exception**, these buildings will loom over R1 backyards,

7.3

7.4

creating severe shadow and privacy impacts .

- **Insufficient Buffer Requirements:** Currently, the code only requires a **5-foot setback for parking** . On narrow lots, this places noise and light pollution directly against R1 fences. Furthermore, while the standards allow for seven-foot landscape screening, this is insufficient to provide a "transition in scale" against a 50-plus-foot building .

7.5

I am formally requesting the following revisions to the R3-C standards for parcels adjacent to R1 land:

1. **Mandatory Setbacks:** Prohibit the use of the 25% "Exception to Standards" for any setback reduction on a property line shared with an R1 lot .
2. **Solar Shade Mandates:** Require a formal solar shade study for any R3-C project adjacent to R1 to prove compliance with Guiding Principle 4 .
3. **Mandatory Upper-Story Stepbacks:** Require a minimum 10-foot stepback for any story above the second on facades facing R1 properties .
4. **Buffer Integrity:** Mandate the use of **large-canopy trees** (minimum 30-foot diameter) along R1 boundaries to provide the scale transition described in the city's Pedestrian Connection standards .
5. **Parking Placement:** To better mitigate noise and light impacts for immediate neighbors, the city require **subterranean parking** for R3-C developments adjacent to R1 lots

7.6

The City's goal of "predictability and confidence" for residents cannot be met if the zoning for a specific block is so physically incompatible that "exceptions" become the only way to build . I look forward to a detailed response in the DEIR regarding the planning logic for this specific upzoning.

Thank you for your time and consideration of these critical issues.

Julie and Chuck Muir



Letter 7

Commenter: Julie and Chuck Muir

Date: June 28, 2026

Response 7.1

Please refer to Master Response 2. No revisions to the Draft EIR would be required in response to this comment.

Response 7.2

Please refer to Master Response 3. No revisions to the Draft EIR would be required in response to this comment.

Response 7.3

Please refer to Master Response 3. No revisions to the Draft EIR would be required in response to this comment.

Response 7.4

Please refer to Master Response 2. No revisions to the Draft EIR would be required in response to this comment.

Response 7.5

Please refer to Master Response 2. No revisions to the Draft EIR would be required in response to this comment.

Response 7.6

Please refer to Master Responses 2 and 3. No revisions to the Draft EIR would be required in response to this comment.

From: Jessica Gandhi [REDACTED]
Sent: Sunday, June 28, 2026 9:25 PM
To: City Council [REDACTED]
Cc: Soosh Gandhi [REDACTED]
Subject: Fwd: Public comment on R3 zoning district update project

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

Dear City Council members,

I'm forwarding this email string to you from my communications with Eric Anderson regarding the R-3 project. My initial email was addressed to the council as well but apparently I had the wrong email address as it bounced. Please read below to see my comments and questions regarding the current proposed changes.

Thank you for your time and please contact me if you have any questions or comments.

Jessica Gandhi

[REDACTED]

North Whisman Neighborhood

8.1

Sent from my iPhone

Begin forwarded message:

From: Jessica Gandhi [REDACTED]
Date: June 28, 2026 at 9:37:48 AM PDT
To: "Eric B. Anderson" [REDACTED]
Cc: Soosh Gandhi [REDACTED], Julie Muir [REDACTED]
Subject: Re: Public comment on R3 zoning district update project

Hi Eric,

I'm sorry too. I realized I never replied to this last message and missed out on meeting last week. I know the deadline for comment is this week so time is short. I'm glad to hear the focus is still on the 14 areas but I would like to know why the area behind our house (the property along Walker Dr that backs up to Wake Forest Dr between Lynwood and Emily Dr) is being recommended as R3-C when the whole property is relatively narrow and adjacent to only R1 homes. The potential size of an R3-C building there, when all of the bonus heights and set back cuts are made is too big to fit in

8.2

that space without significantly affecting the properties adjacent with respect to shadows (cutting off most sunlight) and privacy.
Please explain that particular site R3 designation as we do not feel that is appropriate.

Thank you,
Jessica and Soosh Gandhi

Cc Julie Muir
Sent from my iPhone

8.2
(cont.)

On Jun 18, 2026, at 2:29 PM, Anderson, Eric B.

[REDACTED] wrote:

Jessica,
I apologize, but I am not available tomorrow after all. How about Monday afternoon or Tuesday morning any time?
-Eric

From: Jessica Gandhi [REDACTED]
Sent: Thursday, June 18, 2026 12:39 PM
To: Anderson, Eric B. [REDACTED]
Cc: Soosh Gandhi [REDACTED]
Subject: Re: Public comment on R3 zoning district update project

8.3

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

Hi Eric,
I'm sorry I missed replying to this message. It's been a busy week. Thank you for the clarification below and offering to meet and discuss the details. Friday this week might work. Are there a couple times you can give me to look at our calendars?
Thank you,
Jessica

On Friday, June 12, 2026 at 04:46:01 PM PDT, Anderson, Eric B.
[REDACTED] wrote:

Jessica,

Thank you very much for your email. The proposed project still only increases allowed density in targeted areas, as Council directed last June.

I would be happy to meet with you to help you better understand the details of the project and answer any questions you might have. Do any of the following times work?

Tuesday 10 am or 2 pm

Wednesday 11 am or 3 pm or 4 pm

Friday any time

Thanks,

-Eric

From: Jessica Gandhi [REDACTED]
Sent: Friday, June 12, 2026 2:42 PM
To: Anderson, Eric B. [REDACTED]
Cc: [REDACTED]; Soosh Gandhi
[REDACTED]; Jessica
Subject: Public comment on R3 zoning district update project

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

Dear Eric Anderson and Mountain View City Council Members,

We are writing today regarding public comment for the R3 rezoning district update project.

We are longtime citizens of Mountain View and homeowners since 1999 and have been following the R3 rezoning project closely since its early stages. During that time, we have met with members of the previous City Councils and attended meetings, study sessions and discussions with our neighbors to help share concerns over rezoning in our city.

We were happy to see that after the first recommendations a couple years ago, and plenty of community input, the revised R3 zoning options had seemed to take into account the needs

8.3
(cont.)

8.4

of both increasing housing but also considering the needs of single-family neighborhoods by changing the broad-sweeping change to just focusing on a smaller number (14) of plots.

However, it now seems that the city is changing the focus on the previously identified 14 larger spaces and going back to the original plan of blanket rezoning across the city. In addition, besides this opportunity for public content, it looks as though there will be no additional outreach on this new direction. What was it all worth? The time and energy spent by all involved to just go back to a direction that clearly did not gain approval from a very large portion of current and long-term residents?

We hope we are wrong and misunderstanding the new plan for R3 zoning but if not, we reiterate our previous support to the council on increasing the R3 density only in the 14 change areas recommended by the Planning Commission and not to increase density elsewhere. In addition, we urge the council to stand by your residents in support of the overwhelming request to respect spatial boundaries where R3 zones are adjacent to R1 housing. Please put safe-guards into effect that protect our properties and lifestyles and do not allow blanket decisions but rather work with neighborhoods to build developments that are unique to each situation.

Thank you for your ongoing support of keeping Mountain View a livable city for all.

Soosh & Jessica Gandhi
[REDACTED]
Mountain View, CA 94043

8.4
(cont.)

Letter 8

Commenter: Jessica and Soosh Gandhi

Date: June 28, 2026

Response 8.1

Please refer to Master Response 2. No revisions to the Draft EIR would be required in response to this comment.

Response 8.2

Please refer to Master Response 2. No revisions to the Draft EIR would be required in response to this comment.

Response 8.3

Please refer to Master Response 3 regarding comments on proposed zoning standards, land use designations, and planning policy. No revisions to the Draft EIR would be required in response to this comment.

With respect to public outreach, CEQA requires agencies to provide for public participation in the environmental review process, including public notice of opportunities to review and comment on the Draft EIR. The Draft EIR was circulated for public review in accordance with CEQA, and all comments received during the review period have been considered and included in the Final EIR. The City's environmental review process also included circulation of a Notice of Preparation and a public scoping meeting to solicit community input regarding the scope and content of the environmental analysis.

In addition, the R3 Zoning District Update does not approve any specific development project. Future development proposals that may occur under the adopted zoning regulations would be reviewed independently as they are proposed. Consistent with applicable City procedures, future projects would be subject to their own review processes, including public notice, public hearings, and opportunities for public participation, as required by applicable laws and regulations. In some cases, future projects may also require additional environmental review and associated public comment opportunities, depending on the characteristics of the proposed development and applicable CEQA requirements.

Accordingly, this comment does not identify a deficiency in the Draft EIR's environmental analysis; therefore, no revisions to the Draft EIR are required in response to this comment.

Response 8.4

Please refer to Master Responses 2 and 3. No revisions to the Draft EIR would be required in response to this comment.

From: [Toni R](#)
To: [Anderson, Eric B.](#)
Subject: Public comment regarding R3 Draft Environmental Impact Report and the overall project
Date: Monday, June 29, 2026 3:25:37 PM

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

To the City of Mountain View Community Development Department
 Attn: Eric Anderson, Planning Manager

As a resident of one of the affected R3 areas in the Cuesta Park neighborhood, our parcel is affected by the transition to R3-B and I would like to provide feedback on the EIR and proposed standards. While I support the city's goals of increasing housing diversity (In fact, it is one of the reasons I chose the neighborhood I live in), I have several concerns regarding how these new objective standards will impact the scale and character of neighborhoods, particularly in areas adjacent to existing R1 properties, regardless of their zone.

9.1

Regarding design, the **monolithic block-style buildings** that are meant to illustrate the goal of the R3-B rezoning in the project documents are a complete departure from the existing neighborhood character. I struggle to see how this is going to lead to an attractive neighborhood, especially one that would compare favorably with the existing one.

9.2

The R3-B area is intended to reach a **height of 3 stories**, which is at the top end of what I would consider as compatible with the existing structures in my "R3-B" neighborhood. Like any property, it is subject to the state density bonus law, which **could double the density, leading to twice as many stories**, to the detriment of the existing neighborhood character. I note that the City Council has indicated support for "State density bonus law reform" to ensure the city can better enforce local ordinances. However, as the standards currently stand, the 45-foot height limit may be treated as a "base" that is subject to doubling, leading to buildings grossly out of line with the surrounding area and exacerbating the block-style look of the buildings.

9.3

One of my primary concerns with the project in its current shape is the lack of step-down requirements where R3 parcels abut R1 zones (e.g. around Walker Drive) or projects developed to R1 standards, such as in my neighborhood. I do see some encouragement of "**context-sensitive**" **transitions** in the documents, but no specific rules mandating it in the zoning standards, which would be needed to ensure the preservation of daylight, privacy and some semblance of neighborhood character. I would like to ask the council to include such provisions in the standards.

9.4

Finally, I support and welcome council's direction to **require 1 stall for one-bedroom** or smaller units and 1.5 stalls for two-bedroom or larger units.

9.5

Thank you for the opportunity to comment on this project,
 Toni Rath

Letter 9

Commenter: Toni Rath

Date: June 29, 2026

Response 9.1

Please refer to Master Response 2. No revisions to the Draft EIR would be required in response to this comment.

Response 9.2

Please refer to Master Response 2. No revisions to the Draft EIR would be required in response to this comment.

Response 9.3

Please refer to Master Response 2 regarding the Draft EIR's analysis of aesthetics, visual character, public views, building massing, and neighborhood compatibility. As discussed therein, the Draft EIR evaluates the reasonably foreseeable environmental effects of development that could occur under the proposed zoning framework and concludes that impacts related to visual character and public views would be less than significant.

The commenter's concern regarding future increases in development intensity associated with the State Density Bonus Law pertains to the implementation of State housing law rather than a deficiency in the environmental analysis. However, it should be noted that the State Density Bonus Law establishes certain rights and incentives for qualifying housing developments and is administered through project-level review. Because the R3 Zoning District Update is a program-level zoning action and does not approve any specific development proposal, the Draft EIR cannot evaluate the precise building height, massing, design, or density bonus requests that may be sought by unknown future projects. As explained on page 1-2 of the Draft EIR, a program EIR evaluates the environmental effects associated with the anticipated range of development that may occur under the project and serves as a first-tier environmental document for future project review.

Future development proposals would be subject to applicable State laws, City regulations, and any additional environmental review required by CEQA. The commenter's concerns regarding potential future density bonus requests and the extent to which additional height or development incentives should be accommodated constitute policy considerations and implementation issues rather than deficiencies in the Draft EIR's environmental analysis. Therefore, no revisions to the Draft EIR are required in response to this comment.

Response 9.4

Please refer to Master Response 2. No revisions to the Draft EIR would be required in response to this comment.

Response 9.5

This comment is noted. No revisions to the Draft EIR would be required in response to this comment.

Letter 10



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
wildlife.ca.gov

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

July 2, 2026

Eric Anderson, Advance Planning Manager
City of Mountain View
500 Castro Street, Post Office Box 7540
Mountain View, CA 94039
[REDACTED]

Subject: R3 Zoning District Update Project, Draft Environmental Impact Report, SCH No. 2025070500, City of Mountain View, Santa Clara County

Dear Mr. Anderson:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Environmental Impact Report (EIR) from the City of Mountain View (City) for the R3 Zoning District Update Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

10.1

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

10.2

REGULATORY REQUIREMENTS

California Endangered Species Act

A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, "take" means "hunt, pursue, catch, capture, or

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Erin Anderson, Advanced Planning Planner
 City of Mountain View
 July 2, 2026
 Page 2

kill, or attempt to hunt, pursue, catch, capture, or kill." (Fish & G. Code, § 86.) CDFW's issuance of an ITP is subject to CEQA and to facilitate permit issuance, any project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

California Environmental Quality Act

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065.) In addition, pursuant to CEQA, the lead agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the lead agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, do not eliminate the Project proponent's obligation to comply with the Fish and Game Code.

Lake and Streambed Alteration

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting river, lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the CEQA document and complied with its responsibilities as a responsible agency under CEQA.

10.2 cont

Migratory Birds and Raptors

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Mountain View

Objective: The proposed R3 Zoning District Update would apply to approximately 8,350 parcels covering about 1,260 acres citywide, with final locations to be determined after completion of the draft EIR. The update aims to support diverse housing types, including middle-income ownership housing, improve design quality, enable neighborhood-serving commercial uses, and align with recent state housing laws and Mountain View's 2023–2031 Housing Element programs. Full buildout associated with the R3 Zoning District Update would result in up to 10,000–16,000 additional residential units through the year 2050, consisting of existing development potential for roughly 1,200 existing units plus potential for approximately 8,800–14,800 additional units.

10.3

Erin Anderson, Advanced Planning Planner
City of Mountain View
July 2, 2026
Page 3

Location: The Project is located citywide over 1260 acres in the City of Mountain View in Santa Clara County. GPS coordinates 37°23'22"N, Longitude: 122°4'56"W.

Timeframe: 2026 - 2050

10.3 cont

ENVIRONMENTAL SETTING

Sufficient information regarding the environmental setting is necessary to understand any potentially significant impacts on the environment of the proposed Project and any alternatives identified in the draft EIR (CEQA Guidelines, §§15125 & 15360). CDFW recommends the draft EIR provide baseline habitat assessments for special-status plant, fish, and wildlife species located and potentially located within the Project area and surrounding lands, including all rare, threatened, and endangered species (CEQA Guidelines, §15380). The EIR should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities see:

<https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%20communities>), and any stream, riparian, or wetland set back distances the City may require. Fully protected, threatened or endangered, candidate, and other special-status species or sensitive natural communities that are known to occur, or have the potential to occur in or near the Project area include, but are not limited to: the species listed in the State and Federally Listed Endangered and Threatened Animals of California – February 2026 list at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109405&inline> or State and Federally Listed Endangered, Threatened, and Rare Plants of California – January 2026 at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109390&inline>.

Habitat descriptions and species profiles included in the draft EIR should include robust information from multiple sources: aerial imagery; historical and recent survey data; field reconnaissance; scientific literature and reports; U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System; California Aquatic Resources Inventory; and findings from "positive occurrence" databases such as California Natural Diversity Database (CNDDDB). Only with sufficient data and information can the City adequately assess which special-status species are likely to occur in the Project vicinity.

10.4

CDFW recommends surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: <https://www.wildlife.ca.gov/Conservation/Survey-Protocol>.

Botanical surveys for special-status plant species, including those listed by the California Native Plant Society (<http://www.cnps.org/cnps/rareplants/inventory/>), should also be conducted during the blooming period for all sensitive plant species potentially occurring within the Project area and include the identification of reference populations. Please refer to CDFW protocols for surveying and evaluating impacts to rare plants available at: <https://www.wildlife.ca.gov/Conservation/Plants>.

10.5

IMPACT ANALYSIS AND MITIGATION MEASURES

The CEQA Guidelines (§15126.2) necessitate the Draft EIR discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project. This includes evaluating and describing impacts such as:

- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development;
- Potential for impacts to fully protected and special-status species;
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence; and

10.6

Erin Anderson, Advanced Planning Planner
 City of Mountain View
 July 2, 2026
 Page 4

- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.
- Water quality impacts resulting from construction and operation of the Project;
- Direct or indirect impacts to the bed, channel, and bank, in the reservoirs and creeks downstream of the Project;
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence;
- Impacts both from construction and future operation of the Project.

10.6 cont

The CEQA document also should identify existing and reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project's contribution to each impact (CEQA Guidelines, § 15355). Although a project's impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact (e.g., reduction of available habitat for a listed species) should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

10.7

The CEQA Guidelines direct the City, as the lead agency, to consider and describe in the Draft EIR all feasible mitigation measures to avoid and/or mitigate potentially significant impacts of the Project on the environment based on comprehensive analysis of the potential direct, indirect, and cumulative impacts of the Project. (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370.) This should include a discussion of take avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with the USFWS, the National Marine Fisheries Service and CDFW. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

10.8

Fully protected species may not be taken or possessed at any time except in limited circumstances (Fish & G. Code, §§ 3511, 4700, 5050, & 5515). Therefore, the draft EIR should include measures to completely avoid "take" of fully protected species.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document. Based on the potential for the Project to have a significant impact on biological resources, CDFW concludes that an EIR is appropriate for the Project.

10.9

COMMENT 1: Mitigation Measure BIO-1 Does Not Adequately Protect Wildlife

Issue: Mitigation Measure BIO-1 (Biological Resources Screening and Assessment) requires biological review only for development on undeveloped parcels within 200 feet of a riparian corridor or top of bank, or undeveloped natural area. The draft EIR concludes that impacts to special-status species would be reduced to a less-than-significant level through implementation of BIO-1 through BIO-3. However, BIO-1 is not sufficiently protective because it excludes developed parcels from biological screening, despite the fact that developed lands adjacent to streams and riparian corridors frequently support special-status species, nesting birds, roosting bats, pollinators, and other sensitive wildlife resources.

10.10

The City has not provided substantial evidence demonstrating that developed parcels within the Project area lack habitat value or cannot support wildlife species. BIO-1 could allow redevelopment of parcels containing mature landscaping, heritage trees, ornamental

Erin Anderson, Advanced Planning Planner
 City of Mountain View
 July 2, 2026
 Page 5

vegetation, remnant habitat features, stormwater channels, and other resources used by sensitive wildlife without any evaluation of potential impacts to biological resources. Because the proposed Project would facilitate redevelopment of approximately 8,350 parcels citywide, the omission of developed parcels from the biological review trigger could result in undisclosed and unmitigated impacts to special-status species.

10.10 cont

Evidence of Significant Impacts: Under CEQA, the lead agency is required in an EIR to disclose and analyze impacts to special-status species and sensitive habitats based on substantial evidence and an accurate environmental baseline (CEQA Guidelines §§ 15125(a), 15126.2(a), and Appendix G). Mitigation measures must be supported by substantial evidence and capable of reducing impacts to a less-than-significant level (CEQA Guidelines § 15126.4(a)). The draft EIR acknowledges that streams, riparian corridors, and aquatic resources occur throughout the City and that special-status species may occur within the Project area. However, Mitigation Measure BIO-1 assumes that only undeveloped parcels within 200 feet of these resources warrant biological review. The draft EIR does not provide evidence that demonstrates that developed parcels adjacent to riparian habitat lack potential to support sensitive wildlife or special-status species.

Urban riparian corridors can function as important habitat, movement corridors, and biodiversity reservoirs within developed landscapes. Studies have shown that local riparian habitat characteristics were more important predictors of bird community composition than the degree of surrounding urbanization, indicating that wildlife frequently utilizes habitat patches embedded within developed environments (Pennington et al. 2010). Additionally, riparian corridors support disproportionately high levels of avian diversity and ecological function relative to surrounding developed lands (Golet et al. 2013).

Wildlife responses to riparian habitat extend beyond the immediate riparian corridor. Studies of urban stream ecosystems have found that bird occupancy, species richness, and habitat use frequently extend hundreds of feet from riparian vegetation into adjacent developed areas, particularly where mature trees and landscaped vegetation are present (Pennington et al. 2010; Golet et al. 2013). Consequently, reliance on a 200-foot screening threshold on only developed parcels is not biologically protective.

10.11

Numerous special-status species and other sensitive wildlife routinely utilize developed landscapes. Urban trees, ornamental vegetation, landscaped yards, and stormwater features may provide nesting habitat for migratory birds, roosting habitat for bats, and foraging habitat for pollinators and other wildlife. Bats frequently use urban riparian corridors and associated developed landscapes for commuting and foraging activities, with activity levels strongly associated with riparian vegetation and mature tree cover (Hale et al. 2012; Russo and Ancillotto 2015). Removal of trees and vegetation associated with redevelopment projects may therefore result in direct and indirect impacts to sensitive bat species even on parcels classified as developed. Additionally, urbanization does not eliminate habitat value. Remnant habitat features can often become increasingly important as surrounding development intensifies (Aronson et al. 2017). Mature landscaping and isolated habitat patches can support substantial wildlife use and may contribute to landscape connectivity, particularly where they occur adjacent to streams, drainage corridors, and riparian habitats.

The draft EIR does not provide evidence that demonstrates that developed parcels within 200 feet of riparian resources are incapable of supporting special-status species or other sensitive biological resources. Nor does it provide evidence supporting the use of a limited 200-foot screening threshold. Because the mitigation measure excludes potentially suitable habitat from biological review, impacts to special-status species, nesting birds, roosting bats, and other sensitive wildlife may occur. Consequently, the EIR lacks substantial evidence supporting its conclusion that impacts to biological resources would be reduced to a less-than-significant level.

Recommendations: CDFW recommends that the City revise Mitigation Measure BIO-1 as follows:

10.12

Erin Anderson, Advanced Planning Planner
City of Mountain View
July 2, 2026
Page 6

1. Revise Impact BIO-1 and Mitigation Measure BIO-1 to clarify that biological screening requirements apply to redevelopment projects on developed parcels and are not limited solely to undeveloped land.
2. Require a Biological Resources Screening and Assessment for all parcels, regardless of existing development status, located within at least 250 feet of a riparian corridor, stream, top of bank, wetland, drainage channel, or other aquatic resource.
3. Expand the screening triggers to include parcels containing mature trees, heritage trees, substantial landscaping, stormwater facilities, remnant native vegetation, or other habitat features that may support special-status species, regardless of distance from a stream.
4. Require a qualified biologist to perform a general biological survey to evaluate parcels for potential presence of nesting birds, roosting bats, special-status pollinators, wildlife movement functions, and other sensitive biological resources before determining that no further study is necessary.
5. Provide substantial evidence supporting any proposed buffer distance. If the City retains a 200-foot threshold, the draft EIR should include scientific justification demonstrating that species potentially affected by redevelopment would not utilize habitats beyond that distance.
6. Reevaluate the significance determination for Impact BIO-1 after revising the mitigation measure and incorporate additional avoidance, minimization, and compensatory mitigation measures where necessary.

10.12 cont

COMMENT 2: Deficiencies with Mitigation Measure BIO-3

Issue: Mitigation Measure BIO-3 is triggered when potential impacts to aquatic and/or terrestrial animal species are identified by the project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1. Various conditions are required under this measure to try to ensure impacts are mitigated to a less-than-significant level, but they are lacking in scientific evidence to make them truly biologically protective. These measures are as follows:

6. For all work occurring in areas where **endangered/threatened species** may be present and are at risk of entering the Project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete.

10.13

7. **All vehicle maintenance/fueling/staging shall occur not less than 100 feet from any riparian habitat or water body, including seasonal wetland features.** Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies.

11. Considering the potential for the project to impact federally and state-listed species and their habitat, the City shall contact CDFW and USFWS to **identify mitigation banks within Santa Barbara County** during project development. If the results of the Project-specific biological analysis (Mitigation Measure BIO-1) determine that impacts to federally and state threatened or endangered species habitat are expected, City and/or applicant shall explore species-appropriate mitigation bank(s) servicing the region for purchase of mitigation credits."

Erin Anderson, Advanced Planning Planner
 City of Mountain View
 July 2, 2026
 Page 7

Evidence the impact would be significant: Limiting exclusionary measures to only endangered or threatened species is not fully protective to fish and wildlife species with potential to be present on-site. Non-listed fish and wildlife species may be present on a project site and are at risk of being impacted by project activities. Non-listed species would benefit from exclusionary devices.

Additionally, allowing "vehicle maintenance/fueling/staging to occur as close as 100 feet from any riparian habitat or water body, including seasonal wetland features", runs the risk of spills into nearby water features that could trigger a Notice of Violation (NOV) under Fish and Game Code. Under Fish and Game Code 5650, it is unlawful to deposit in, permit to pass into, or place where it can pass into the waters of this state any substance or material deleterious to fish, plant life, mammals, or bird life. Under Fish and Game Code 5652, it is unlawful to deposit, permit to pass into, or place where it can pass into the waters of the state, or to abandon, dispose of, or throw away, within 150 feet of the high water mark of the waters of the state, any cans, bottles, garbage, motor vehicle or parts thereof, rubbish, litter, refuse, waste, debris, or the viscera or carcass of any dead mammal, or the carcass of any dead bird. Staging vehicles so close to riparian habitat or streams increases the risk of deleterious materials entering a stream.

Lastly, requiring mitigation banks to be located within Santa Barbara County when the City of Mountain View is located within Santa Clara County is not scientifically sound and does not appropriately mitigate for impacts to local habitat and species. In order to adequately mitigate for impacts to projects in Santa Clara County, the City should heavily prioritize mitigation to be localized, watershed-based, and/or ecosystem-specific to the impact.

Recommendations: CDFW recommends the City revise BIO-3 as follows:

1. Revise #6 to read as follows: "For all work occurring in areas where wildlife species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved qualified biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete."
2. Revise #7 as follows: "All vehicle maintenance/fueling/staging shall occur more than 150 feet from any riparian habitat or water body, including seasonal wetland features. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies."
3. Revise #11 as follows: "Considering the potential for the project to impact federally and state-listed species (and potentially other special-status species) and their habitat, the City shall contact CDFW and USFWS to identify mitigation banks within Santa Clara County during project development. If the results of the project-specific biological analysis (Mitigation Measure BIO-1) determine that impacts to federally and state threatened or endangered species (and potentially other special-status species) habitat are expected, City and/or applicant shall explore species-appropriate mitigation bank(s) servicing the region for purchase of mitigation credits."

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).)

10.13 cont

10.14

10.15

Erin Anderson, Advanced Planning Planner
City of Mountain View
July 2, 2026
Page 8

Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

10.15 cont

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

10.16

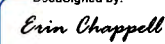
CONCLUSION

CDFW appreciates the opportunity to comment on the draft EIR to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed Emily Carlson, Environmental Scientist, at [REDACTED] or Jason Faridi, Senior Environmental Scientist (Supervisory), at [REDACTED].

10.17

Sincerely,

DocuSigned by:

Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Land Use and Climate Innovation, State Clearinghouse (SCH No. 2025070500)
Craig Weightman, CDFW Bay Delta Region - [REDACTED]

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Letter 10

Commenter: Erin Chappell Regional Manager, California Department of Fish and Wildlife (CDFW)

Date: July 2, 2026

Response 10.1

The comment identifies CDFW's role as a trustee and responsible agency under CEQA. The City agrees that clarification regarding CDFW's role is appropriate. CDFW is a trustee agency with jurisdiction over fish and wildlife resources that may be affected by implementation of the Proposed Project. During future development, CDFW may also serve as a responsible agency where it has discretionary approval authority over one or more aspects of a future project. CDFW reviewed the Draft EIR and submitted the comments addressed in this letter.

The following revisions were made to page 1-10 of the Draft EIR in response to this comment:

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

A responsible agency refers to a public agency other than the lead agency that has discretionary approval authority over the project. ~~There are no responsible agencies for this Project. No responsible agency approval is required for adoption of the Proposed Project. Depending on the circumstances of future development facilitated by the Project, the California Department of Fish and Wildlife (CDFW) or another public agency may serve as a responsible agency where the agency has discretionary approval authority.~~

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. ~~There are no trustee agencies for the proposed project. CDFW is a trustee agency with jurisdiction over fish and wildlife resources that may be affected by implementation of the Project.~~

These revisions provide clarifying information and do not change the environmental analysis or significance findings of the Draft EIR.

Response 10.2

This comment is noted and no revisions are required on the Draft EIR in response to this comment.

Response 10.3

This comment is noted and no revisions are required on the Draft EIR in response to this comment.

Response 10.4

The commenter recommends that additional information regarding biological resources be included in the Draft EIR. However, the comment does not provide specific factual information, technical analysis, or substantial evidence demonstrating that the biological resources analysis contained in the Draft EIR is inaccurate, incomplete, or otherwise inadequate. Nor does the comment identify a specific deficiency in the impact analysis or significance conclusions. The recommendation is acknowledged; however, CEQA requires an EIR to provide information sufficient for informed decision-making at the level of detail appropriate to the project being analyzed.

The biological setting for the Draft EIR is described in Section 4.3, *Biological Resources*, and was developed using multiple available sources of biological resources information appropriate for a program-level environmental review. As described in the Draft EIR, the analysis relied on available resource agency databases and mapping resources, including the California Natural Diversity Database (CNDDB), U.S. Fish and Wildlife Service Information for Planning and Consultation (IPaC) system,

California Aquatic Resources Inventory (CARI), National Wetlands Inventory mapping, existing biological studies, aerial imagery, and other publicly available biological resource information. These sources were used to identify special-status species, sensitive natural communities, aquatic resources, and other biological resources with potential to occur within the project area.

The proposed project is a citywide, programmatic zoning update affecting approximately 8,350 parcels over approximately 1,260 acres and does not approve any site-specific development projects, grading activities, or construction plans. Because redevelopment may occur on some parcels, may not occur on others, would occur incrementally over time, and would be reviewed individually for site-specific conditions as required in mitigation measures BIO-1 through BIO-3, preparation of detailed biological resource inventories for each affected parcel would be beyond the scope of a Program EIR and would be impractical and would not provide meaningful information regarding the site conditions that will exist when future redevelopment projects are proposed.

To address future site-specific biological resource concerns, the Draft EIR includes mitigation measures BIO-1 through BIO-3, which require project-level biological screening, special-status plant surveys where appropriate, biological surveys, agency consultation, avoidance and minimization measures, permitting, and resource protection measures based on actual site conditions. These measures ensure that biological resources are evaluated when sufficient project-specific information is available.

Accordingly, no revisions are required on the Draft EIR in response to this comment.

Response 10.5

The commenter recommends that future surveys for special-status species and special-status plants be conducted in accordance with applicable survey protocols. The City generally agrees that future biological surveys, where required, should be conducted using appropriate professional standards and regulatory guidance. However, the comment does not provide information or analysis demonstrating that the Draft EIR's biological resources analysis is deficient or that additional citywide surveys are required at the programmatic level of review. The recommendation primarily concerns implementation of future project-level biological review.

The Proposed Project is a programmatic, citywide zoning update affecting approximately 8,350 parcels across approximately 1,260 acres and does not approve any specific development project, site plan, grading activity, or construction proposal. Because future redevelopment may occur on some parcels, may never occur on others, and would occur incrementally over many years, conducting parcel-specific biological surveys across all affected properties would be impractical and would not provide meaningful information regarding future Project-level conditions that may exist when individual redevelopment projects are eventually proposed. CEQA recognizes that the level of detail contained in an EIR should correspond to the degree of specificity involved in the underlying project. The Program EIR therefore evaluates biological resources at a level appropriate for a citywide zoning update while deferring site-specific investigations to future project review.

To address the uncertainty inherent in a programmatic zoning update, the Draft EIR incorporates mitigation measures BIO-1 through BIO-3, which establish a framework for future biological review and resource protection. Mitigation Measure BIO-1 requires project-specific biological resources screening and assessment for qualifying future development projects to determine whether special-status species, sensitive habitats, nesting birds, or other biological resources may be affected. Mitigation Measure BIO-2 requires special-status plant surveys and impact avoidance measures, where appropriate, based on the results of project-specific review. Mitigation Measure BIO-3 requires project-specific avoidance, minimization, surveying, monitoring, permitting, consultation, and other protective measures where sensitive wildlife species or habitats may be affected by future development. Collectively, these mitigation measures ensure that biological resources are evaluated at the time site-specific development is proposed, when detailed project plans, construction methods, and existing site conditions are known.

Accordingly, the City finds that the biological setting and impact analysis contained in the Draft EIR are appropriate for a program-level zoning update and that mitigation measures BIO-1 through BIO-3 provide an effective framework for future site-specific biological review. No revisions to the Draft EIR are required in response to this comment.

Response 10.6

The commenter recommends that the EIR evaluate direct, indirect, and cumulative impacts to biological resources associated with future development. However, the comment does not identify a specific deficiency in the analyses presented in the Draft EIR or provide evidence demonstrating that any relevant impact category was omitted. As discussed below, Section 4.3, *Biological Resources*, evaluates direct, indirect, and cumulative impacts to biological resources, including impacts to special-status species, nesting birds, wetlands, riparian habitat, sensitive natural communities, wildlife movement, and aquatic resources.

Section 4.3, *Biological Resources*, evaluates direct, indirect, and cumulative impacts to biological resources, including impacts to special-status species, nesting birds, wetlands, riparian habitat, sensitive natural communities, wildlife movement, and aquatic resources. The Draft EIR also evaluates cumulative biological impacts and identifies mitigation measures BIO-1 through BIO-3 to reduce impacts to less-than-significant levels. The Draft EIR adequately evaluates biological resource impacts consistent with CEQA requirements. No revisions to the Draft EIR are required in response to this comment.

Response 10.7

The commenter states that the Draft EIR should identify and evaluate cumulative biological resource impacts and determine whether the project's contribution would be cumulatively considerable. However, the comment does not identify any specific omission, analytical deficiency, or inconsistency in the cumulative biological resources analysis presented in the Draft EIR. Rather, the comment generally requests that such analysis be included.

The Draft EIR evaluates cumulative impacts consistent with *CEQA Guidelines* Section 15355 and includes cumulative biological resource analyses in Section 4.3, *Biological Resources*. As described in Chapter 3 of the Draft EIR, the cumulative analysis considers the Proposed Project together with past, present, and reasonably foreseeable future development, including projects identified in the cumulative project list and applicable regional growth projections.

The Draft EIR specifically evaluates cumulative impacts to special-status species, sensitive habitats, wetlands, riparian resources, wildlife movement, and other biological resources and assesses whether the project's contribution to those impacts would be cumulatively considerable. The analysis concludes that, with implementation of mitigation measures BIO-1 through BIO-3 and compliance with applicable regulatory requirements, the project's contribution to cumulative biological resource impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

Overall, the Draft EIR adequately identifies and evaluates cumulative biological resource impacts and assesses the significance of the Project's contribution to those impacts consistent with CEQA requirements. No revisions to the Draft EIR are required in response to this comment.

Response 10.8

The commenter recommends additional avoidance, minimization, mitigation, and agency coordination measures for future development projects. However, the comment does not provide specific information, analysis, or substantial evidence demonstrating that the mitigation framework contained in the Draft EIR is inadequate or that the significance conclusions are unsupported. As discussed within Response 10.5, above, Mitigation Measures BIO-1 through BIO-3 require future project-specific biological review, species surveys where appropriate, implementation of avoidance and minimization measures, and consultation with applicable resource agencies where required. Future projects would remain subject to all applicable

state and federal regulations protecting special-status species and fully protected species. No revisions to the Draft EIR are required in response to this comment.

Response 10.9

This comment is noted and no revisions are required on the Draft EIR in response to this comment.

Response 10.10

The Proposed Project is a programmatic zoning update affecting approximately 8,350 parcels citywide and does not authorize any site-specific development activity. Consistent with CEQA Guidelines Sections 15168 and 15152, the Draft EIR evaluates biological resources at a level of detail appropriate for a first-tier environmental review and relies on future project-level review to evaluate site-specific biological conditions that may exist at the time redevelopment is proposed.

Section 4.3, *Biological Resources*, acknowledges that biological resources occur throughout the city, including riparian corridors, aquatic resources, nesting bird habitat, and urban habitat features that may support special-status species. The purpose of Mitigation Measure BIO-1 is not to categorically exclude developed parcels from future biological review, but rather, to establish a screening process that identifies future projects with the greatest likelihood of affecting sensitive biological resources. Because future redevelopment locations, project designs, site conditions, landscaping conditions, and habitat features are currently unknown, the City finds that a programmatic screening framework is more appropriate and effective than attempting to conduct parcel-specific biological surveys now for thousands of properties that may never redevelop.

Furthermore, even where Mitigation Measure BIO-1 is not triggered, future projects remain subject to federal, State, and local regulations protecting nesting birds, special-status species, heritage trees, stream corridors, wetlands, and other biological resources. In addition, project applicants remain responsible for complying with all applicable Fish and Game Code requirements, CESA requirements, and permit requirements that may be applicable at the time development is proposed.

Nevertheless, the City agrees that additional clarification would improve implementation of Mitigation Measure BIO-1. See Response 10.12, below, for those revisions to the Final EIR.

Response 10.11

The Proposed Project is intended to guide redevelopment through 2050. Because most parcels have existing development, some may never redevelop, and because biological conditions may substantially change over time, a parcel-by-parcel biological survey inventory would not be feasible and would not necessarily provide useful information for future project review. The Draft EIR therefore relies on a programmatic screening and mitigation framework designed to identify biological resource issues when specific development projects are proposed. Consistent with *CEQA Guidelines* Sections 15152 and 15168, the level of detail contained in the Draft EIR reflects the nature of the project being evaluated and recognizes that site-specific biological conditions will be more accurately assessed when individual development proposals are submitted.

The City agrees with the commenter's general observation that developed properties may contain habitat features with biological value. The Draft EIR does not assume that developed parcels are devoid of habitat or incapable of supporting sensitive species. Rather, Section 4.3, *Biological Resources*, acknowledges the presence of streams, riparian corridors, aquatic resources, nesting bird habitat, and special-status species throughout the city.

The City also notes that future development projects remain subject to numerous regulatory requirements protecting biological resources, including federal and State protections for special-status species and nesting birds, as well as local tree protection requirements. In addition, mitigation measures BIO-1, BIO-2, and BIO-3 collectively require project-specific biological evaluation, special-status plant surveys where appropriate, wildlife surveys and avoidance measures, agency consultation, permitting, monitoring, and implementation of resource protection measures based on actual site conditions.

Although the City disagrees that the Draft EIR lacks adequate support for its significance determination, the City agrees that the mitigation framework can be strengthened and clarified in response to CDFW's recommendations. As discussed below in Response 10.12, Mitigation Measure BIO-1 has been revised to incorporate additional habitat-based screening criteria such that future development sites containing mature trees, heritage trees, substantial landscaping, remnant native vegetation, stormwater facilities, riparian vegetation, wildlife movement features, or other habitat characteristics that may support special-status species or sensitive biological resources may be subject to biological screening regardless of development status. These revisions enhance implementation of the biological mitigation framework but do not alter the Draft EIR's conclusion that biological impacts would be reduced to a less-than-significant level.

Response 10.12

In response to this comment, the following revisions were made to page 4.3-24 of the Draft EIR:

Future development projects would also be subject to state and federal laws, regulations, and management policies regarding biological resources (e.g., federal and state Endangered Species Acts). Biological screening may also be required where future development sites contain mature trees, heritage trees, substantial landscaping, remnant native vegetation, stormwater facilities, riparian vegetation, wildlife movement features, or other habitat characteristics that may support special-status species or sensitive biological resources, as determined by a qualified biologist.

The following revisions were made to page 4.3-28 of the Draft EIR:

BIO-1 Biological Resources Screening and Assessment

~~For~~ The following applies to development facilitated by the R3 Zoning District Update on ~~undeveloped~~ parcels within ~~200~~ 250 feet of a riparian corridor, stream, wetland, drainage, or top of bank, or undeveloped natural area ~~other aquatic resource, or parcels that contain mature trees, heritage trees, substantial landscaping, stormwater facilities, remnant native vegetation, or other habitat features that may support special-status species.~~ ~~p~~ Prior to first discretionary approval or construction activities (if non-discretionary) and if determined necessary based on preliminary review conducted by City Staff, the City shall require project applicants to engage a qualified biologist (having the appropriate education and experience level) to perform a baseline Biological Resources Screening and Assessment to determine whether the project would have the potential to impact special-status biological resources, inclusive of special-status plants and animals, sensitive vegetation communities (including vernal pools and other wetlands), and critical habitat.

If it is determined that the project site does not contain nesting birds, roosting bats, special-status species, wildlife movement functions, and other sensitive biological resources and has no potential to impact biological resources, no further action is required. If the project would have the potential to impact biological resources, ~~prior to construction,~~ a qualified biologist shall conduct a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 500 feet around the project footprint, as is feasible, and to determine the potential impacts to those resources. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, state, and/or federal agencies. If the project would have the potential to impact these resources, the following mitigation measures (Mitigation Measures BIO-2 and BIO-3) shall be incorporated, as applicable, to reduce impacts to a less than significant level. Pending the results of the project-specific biological analysis, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, CDFW, and/or other local, state, and federal agencies may be required. Note that specific surveys described in the mitigation measures below may be completed as part of the project-specific biological analysis where suitable habitat is present.

These additions to the Draft EIR provide clarifying information but do not change the significance findings or impact analysis of the Draft EIR.

Response 10.13

As described in Section 4.3, *Biological Resources*, of the Draft EIR, Mitigation Measure BIO-3 establishes a project-level framework requiring biological surveys, agency consultation, avoidance measures, monitoring, permitting, and species-specific protective measures where future development could affect biological resources.

The City agrees, however, that several provisions of BIO-3 can be clarified and strengthened to improve implementation of the mitigation measure. Specifically, the City agrees that future exclusion fencing requirements should not be limited solely to listed species, that increasing the minimum setback distance for fueling, maintenance, and staging activities near aquatic resources would provide additional protection of water quality and biological resources, and that the reference to mitigation banks in Santa Barbara County is inappropriate for a project located in Santa Clara County. These revisions improve consistency with the intent of the mitigation measure and provide additional protection for biological resources. The City agrees that certain provisions of Mitigation Measure BIO-3 can be revised to improve clarity and consistency with resource protection objectives. Revisions are discussed in Response 10.14, below.

While the City agrees that these revisions improve the implementation of BIO-3, the City does not agree that the existing measure lacks sufficient evidentiary support or that the Draft EIR's significance conclusions should be changed. Rather, the revisions described in Response 10.14 further strengthen an already comprehensive mitigation framework for future project-level biological review. Therefore, no revisions to the significance determination are required.

Response 10.14

The City agrees that certain provisions of Mitigation Measure BIO-3 can be revised to improve clarity and consistency with resource protection objectives. Accordingly, the following revisions were made to page 4.3-29 of the Draft EIR:

6. For all work occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved qualified biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete.
7. All vehicle maintenance/fueling/staging shall occur ~~not less than 100~~ more than 150 feet from any riparian habitat or water body, including seasonal wetland features, to the maximum extent feasible. Suitable containment procedures shall be implemented to prevent spills. Where maintaining this setback is not feasible, secondary containment shall be required and suitable containment procedures shall be implemented. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies.
11. Considering the potential for the project to impact federally and state-listed species (and potentially other special-status species) and their habitat, the City shall contact CDFW and USFWS to identify mitigation banks within Santa ~~Barbara~~ Clara County during project development. If the results of the project-specific biological analysis (Mitigation Measure BIO-1) determine that impacts to federally and state threatened or endangered species (and potentially other special-status species) habitat are expected, City and/or applicant shall explore species appropriate mitigation bank(s) servicing the region for purchase of mitigation credits.

This addition to the Draft EIR provides clarifying information but does not identify a new environmental impact or change the significance findings or impact analysis of the Draft EIR.

Response 10.15

The commenter requests that special-status species and sensitive natural communities identified during future surveys be reported to the California Natural Diversity Database. The comment concerns future biological reporting practices and does not identify a deficiency in the biological resources analysis contained in the Draft EIR.

Due to the programmatic nature of the Draft EIR, biological surveys were not conducted and therefore no submittals to the California Natural Diversity Database are warranted at this time. However, mitigation measures identified in Section 4.3, *Biological Resources*, of the Draft EIR require special-status plant surveys and pre-construction wildlife surveys for individual development projects facilitated by the Proposed Project to confirm the presence of special-status species. The project proponent must implement mitigation measures BIO-1 through BIO-3; reporting occurrences to the CNDDB may be done for documentation purposes, but such reporting is not a mitigation measure, does not substitute for the required mitigation. No revisions to the Draft EIR would be required in response to this comment.

Response 10.16

The City thanks the commenter for their reminder of recording obligations and filing fees. Once the project is approved, the City will pay the required CDFW fees at the time the Notice of Determination for the Final EIR is filed. No revisions to the Draft EIR would be required in response to this comment.

Response 10.17

This comment does not contain a substantive comment on the Draft EIR. No further response is required.

Letter 11

From: [Aarthi Rajiv](#)
To: [Anderson, Eric B.](#)
Cc: council@mountainview.gov
Subject: Public comment on R3 zoning district update project
Date: Thursday, July 2, 2026 9:18:59 PM

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

Dear Eric,

We understand we missed the deadline for public comment by 2 days but we must write this,

We'd like to voice my opposition to the proposed R3-C zoning for the narrow Walker Drive plot backing up to R1 homes on Wake Forest Drive.

It is entirely inappropriate to allow high-density buildings with bonus heights and reduced setbacks in such a confined space adjacent to single-family housing.

Our block urgently needs strict height restrictions and significant setbacks to prevent extreme shadowing and the complete loss of our privacy.

Please clarify the justification for this specific site's R3 designation and reconsider the zoning to protect our properties.

Thanks.

Aarthi Rajiv and Rajiv Subrahmanyam

11.1

Letter 11

Commenter: Aarthi Rajiv and Rajiv Subrahmanyam

Date: July 2, 2026

Response 11.1

Please refer to Master Responses 1, 2, and 3. No revisions to the Draft EIR would be required in response to this comment.

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3 Revisions to the Draft EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in ~~strike through~~, and text additions are shown in underline.

CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred but before the EIR is certified (Public Resources Code Section 21092.1; *CEQA Guidelines* Section 15088.5). Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR (*CEQA Guidelines* Section 15088.5(b)).

The relevant portions of *CEQA Guidelines* Section 15088.5 (items a, b and e) read as follows:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:
 - 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
 - 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.
- (e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.

The information added to this Final EIR noted in this section supplements, clarifies, amplifies, and corrects information in the Draft EIR. The City has reviewed the information in the Revisions to the Draft EIR and has determined that it does not change any of the basic findings or conclusions of the EIR, does not constitute “significant new information” pursuant to *CEQA Guidelines* Section 15088.5, and does not require recirculation of the Draft EIR. This decision is supported by substantial evidence provided in this EIR.

3.1 Revisions to the Draft EIR

Introduction

Page 1-10 of the Draft EIR:

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

A responsible agency refers to a public agency other than the lead agency that has discretionary approval authority over the project. ~~There are no responsible agencies for this Project.~~ No responsible agency approval is required for adoption of the Proposed Project. Depending on the circumstances of future development facilitated by the Project, the California Department of Fish and Wildlife (CDFW) or another public agency may serve as a responsible agency where the agency has discretionary approval authority.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. ~~There are no trustee agencies for the proposed project.~~ CDFW is a trustee agency with jurisdiction over fish and wildlife resources that may be affected by implementation of the Project.

Environmental Setting

Page 3-3:

Table 3-1 Cumulative Plans and Projects List

Project	Jurisdiction	Location/Planning Area	Project Details	Status
762 San Antonio Road	City of Palo Alto	N/A	7-story multi-family residential building containing ~~198~~ <u>228</u> rental apartments	Undergoing review
<u>788 San Antonio Road</u>	<u>City of Palo Alto</u>	<u>N/A</u>	<u>4-story mixed-use development with 102 residential units and 1,800 square feet of ground floor retail space</u>	<u>Approved</u>
<u>800-808 San Antonio Road</u>	<u>City of Palo Alto</u>		<u>8-story multi-family residential building with 174 units</u>	<u>Undergoing review</u>
824 San Antonio Road	City of Palo Alto	N/A	4-story private residential senior living facility	~~Undergoing review~~ <u>Approved</u>

Biological Resources

Page 4.4-17 of the Draft EIR:

City of Mountain View Bird-Safe Building Standards

In 2025, the City of Mountain View adopted bird-safe building design requirements as part of its Building Code update (in Chapter 8, Article XII, Division 18 of the Mountain View City Code). These requirements are intended to reduce bird collisions with glass and other building features by incorporating bird-safe design principles into new development and qualifying building modifications. The standards generally require the use of bird-safe glazing treatments or materials in areas of buildings that present a heightened risk of bird strikes and encourage building designs that minimize hazardous reflections and visual transparency. Applicable development projects are required to demonstrate compliance with the City's bird-safe building standards during building permit review. These standards are intended to reduce adverse effects on migratory birds and other avian species that may occur in urbanized environments.

Page 4.3-24 of the Draft EIR:

Future development projects would also be subject to state and federal laws, regulations, and management policies regarding biological resources (e.g., federal and state Endangered Species Acts). Biological screening may also be required where future development sites contain mature trees, heritage trees, substantial landscaping, remnant native vegetation, stormwater facilities, riparian vegetation, wildlife movement features, or other habitat characteristics that may support special-status species or sensitive biological resources, as determined by a qualified biologist.

Page 4.3-28 of the Draft EIR:

BIO-1 Biological Resources Screening and Assessment

~~For The following applies to development facilitated by the R3 Zoning District Update on undeveloped parcels within 200 250 feet of a riparian corridor, stream, wetland, drainage, or top of bank, or undeveloped natural area other aquatic resource, or parcels that contain mature trees, heritage trees, substantial landscaping, stormwater facilities, remnant native vegetation, or other habitat features that may support special-status species, p.~~ Prior to first discretionary approval or construction activities (if non-discretionary) and if determined necessary based on preliminary review conducted by City Staff, the City shall require project applicants to engage a qualified biologist (having the appropriate education and experience level) to perform a baseline Biological Resources Screening and Assessment to determine whether the project would have the potential to impact special-status biological resources, inclusive of special-status plants and animals, sensitive vegetation communities (including vernal pools and other wetlands), and critical habitat.

If it is determined that the project site does not contain nesting birds, roosting bats, special-status species, wildlife movement functions, and other sensitive biological resources and has no potential to impact biological resources, no further action is required. If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 500 feet around the project footprint, as is feasible, and to determine the potential impacts to those resources. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, state, and/or federal agencies. If the project would have the potential to impact these resources, the following mitigation measures (Mitigation Measures BIO-2 and BIO-3) shall be incorporated, as applicable, to reduce impacts to a less than significant level. Pending the results of the project-specific biological analysis, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, CDFW, and/or other local, state, and federal

agencies may be required. Note that specific surveys described in the mitigation measures below may be completed as part of the project-specific biological analysis where suitable habitat is present.

Page 4.3-29 of the Draft EIR:

6. For all work occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved qualified biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete.
7. All vehicle maintenance/fueling/staging shall occur ~~not less than 100~~ more than 150 feet from any riparian habitat or water body, including seasonal wetland features, to the maximum extent feasible. Suitable containment procedures shall be implemented to prevent spills. Where maintaining this setback is not feasible, secondary containment shall be required and suitable containment procedures shall be implemented. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies.
11. Considering the potential for the project to impact federally and state-listed species (and potentially other special-status species) and their habitat, the City shall contact CDFW and USFWS to identify mitigation banks within Santa ~~Barbara~~ Clara County during project development. If the results of the project-specific biological analysis (Mitigation Measure BIO-1) determine that impacts to federally and state threatened or endangered species (and potentially other special-status species) habitat are expected, City and/or applicant shall explore species appropriate mitigation bank(s) servicing the region for purchase of mitigation credits.

Cultural Resources

Page 4.4-19 of the Draft EIR:

CUL-1a Historical Resources Evaluations

The historical resources evaluation described below shall not be required if a property is already a historical resource as defined by CEQA Guidelines Section 15064.5(a), or has been evaluated as ineligible pursuant to the criteria outlined in CEQA Guidelines Section 15064.5(a)(3), or evaluated in a survey meeting the requirements of 5024.1(g) of the California Public Resources Code. In 2023, the City conducted a reconnaissance survey of the following structures if they were built before 1980: multi-family and nonresidential buildings City-wide, single-family and duplex dwellings outside of R zones, and previously identified resources. The survey identified a select few for intensive-level evaluation and nomination to the City's Register, which shall not require re-evaluation. Other information from the survey may be used, as appropriate, to inform site-specific evaluations.

A historical resources evaluation shall be prepared for development projects ~~carried out under the project~~ involving the demolition or substantial physical alteration of a building, structure, object, site, or historic district that is 45 years of age or older. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history (Qualified Architectural Historian). The Qualified Architectural Historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify potential historical resources that could be subject to direct or indirect impacts as a result of the proposed development. All properties 45 years of age or older shall be evaluated for eligibility for listing in the NRHP, CRHR and Mountain View Register of Historic Resources within their historic

context and documented in a report meeting the State Office of Historic Preservation guidelines. All evaluated properties shall be documented on California Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the City for review and concurrence. The final report shall be submitted to the Northwest Information Center.

Hazards and Hazardous Resources

Page 4.7-22 of the Draft EIR:

Mitigation Measure HAZ-1: Phase I Environmental Site Assessment

Prior to the start of construction (demolition or grading), the project applicant shall retain a qualified environmental professional (EP), as defined American Society for Testing and Materials Standard (ASTM) E1527 to prepare a project-specific Phase I Environmental Site Assessment (ESA) in accordance with standard ASTM methodologies, to assess the land use history of the Project site. The Phase I assessment shall include a records review of appropriate federal, State, and local databases within ASTM-listed search distances regarding hazardous materials use, storage, or disposal at the given site, a review of historical topographic maps and aerial photographs, a site reconnaissance, interviews with persons knowledgeable about the sites historical uses, and review of other relevant existing information that could identify the potential existence of Recognized Environmental Conditions, including hazardous materials, or contaminated soil or groundwater. If no Recognized Environmental Conditions are identified, then no further action would be required.

If Recognized Environmental Conditions are identified and the Phase I assessment recommends further action, the Pproject applicant shall conduct the appropriate follow-up actions, which may include preparation of a Phase II ESA, further records review, sampling of potentially hazardous materials, and possibly site cleanup. In the event that site cleanup is required, the Pproject shall not proceed until the site has been cleaned up to the satisfaction of the appropriate regulatory agency (e.g., DTSC, RWQCB, or SCCEHD) such that the regulatory agency issues a No Further Action letter or equivalent.

As part of the Phase II ESA, the qualified environmental consultant (PG or PE) shall screen the analytical results against the San Francisco Bay Regional Water Quality Control Board environmental screening levels (ESL). These ESLs are risk-based screening levels under various depth and land use scenarios. The lead agency shall review, approve, and implement recommendations of the Phase II ESA prior to demolition and grading (construction).

Noise

Page 4.7-22 of the Draft EIR:

NOI-1 Pile Driving Noise Reduction

If pile driving activities are proposed within 50 feet of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental health care facilities, places of worship, libraries and museums, transient lodging, and office building interiors) the following measures shall be implemented:

The Pproject applicant shall prepare a pile driving noise reduction plan, which shall be submitted to the City for approval prior to the start of construction. The plan will include but is not limited to the following measures: With approval of the Pproject structural engineer, pile holes will be pre-drilled to minimize the number of impacts necessary to seat the pile.

Pile driving shall be scheduled to have the least impact on nearby sensitive receptors, where feasible (e.g., operating during mid-day hours, avoiding operation during school hours, etc.).

Pile drivers with the best available noise control technology will be used. For example, pile driving noise control may be achieved by shrouding the pile hammer point of impact, by placing resilient padding directly on top of the pile cap, and/or by reducing exhaust noise with a sound-absorbing muffler.

Alternatives to impact hammers, such as caisson drilling (drilling piles), vibratory pile driving, oscillating or rotating pile installation methods, and jetting or partial jetting of piles into place using a water injection at the tip shall be used, where feasible.

Page 4.10-18 of the Draft EIR:

NOI-2 Pile Driver Vibration Reduction Measures

If pile driving activities are proposed within 135 feet of an historic structure or 100 feet from a timber/masonry structure (residential building) or Engineered Concrete/Masonry structure (commercial building), the following measures shall be implemented:

- The Pproject applicant shall retain a qualified consultant to prepare a project-specific construction vibration impact analysis.
- Pile driving vibration shall not exceed 0.12 in/sec PPV at buildings extremely susceptible to vibration damage (i.e., historic buildings); groundborne vibration levels exceeding 0.2 in/sec PPV at non-engineered timber and masonry buildings (i.e., residential buildings) and engineered Concrete/Masonry structure (commercial building).
- Provided the analysis concludes vibration levels do not exceed 0.12 in/sec PPV at buildings extremely susceptible to vibration damage (i.e., historic buildings); groundborne vibration levels exceeding 0.2 in/sec PPV at non-engineered timber and masonry buildings (i.e., residential buildings) or engineered Concrete/Masonry structure (commercial building), construction may proceed without additional measures.
- Provided the analysis concludes that pile driving vibration levels exceed 0.12 in/sec PPV at buildings extremely susceptible to vibration damage (i.e., historic buildings); groundborne vibration levels exceeding 0.2 in/sec PPV at non-engineered timber and masonry buildings (i.e., residential buildings) or engineered Concrete/Masonry structure (commercial building), additional measures shall be implemented to reduce vibration levels below the standard, as determined by the qualified consultant. These measures may include, but not be limited to, pre-drilling pile holes, utilizing a vibratory pile driver, or performing pile driving at a further distance from the noise-sensitive land use to reduce vibration levels.
- The analysis of nighttime pile driving vibration shall be completed in accordance with industry standards. The analysis shall consider the type of pile driver to be used and potential vibration levels at vibration-sensitive receivers located within 160 feet of the R3 Zoning District Update Site.

Transportation

Page 4.13-4 (Regulatory Setting)

California Transportation Plan 2050

The California Transportation Plan 2050 (CTP 2050), prepared by the California Department of Transportation, establishes a long-range statewide transportation vision intended to support California's climate, equity, public health, and economic goals through an integrated transportation and land use framework. The CTP 2050 promotes development patterns that reduce vehicle travel demand by encouraging housing in locations near jobs, transit, services, and other daily destinations. The plan supports infill development, multimodal transportation systems, active transportation opportunities, and transportation investments that improve mobility while reducing greenhouse gas emissions and vehicle miles traveled.

Tribal Cultural Resources

Page 4.14-6 of the Draft EIR:

TCR-1 Suspension of Work Around Potential Tribal Cultural Resources

In the event archaeological resources of Native American origin are identified during construction on the ~~Change Area~~ R3 Zoning District Update sites, all earth-disturbing work within 50 feet of the find shall be suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City of Mountain View, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with local Native American group(s). The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery. The City of Mountain View shall review and approve the plan prior to implementation.

Utilities and Service Systems

Page 4.15-2 (Section 4.15-1 Setting):

Valley Water's water supply is comprised of several sources, including the State Water Project (SWP), Central Valley Project (CVP), local surface water, recycled water, natural groundwater recharge, a ~~s~~Semitropic ~~g~~Groundwater bank, local reservoirs, and groundwater storage.

Page 4.15-2 (Section 4.15-1 Setting):

In addition to the water supplied by the SWP and CVP, Valley Water manages 10 reservoirs across Santa Clara County with a combined storage capacity of approximately 166,000 AF. These reservoirs capture local watershed runoff, which is gradually released throughout the year to support groundwater recharge. In addition, water from Anderson, Coyote, Almaden, and Calero Reservoirs can be directed to Valley Water's treatment plants for potable use. Operational restrictions have been imposed on Almaden, Calero, Coyote, and Guadalupe Reservoirs. As a result, the combined storage capacity available within Valley Water's reservoir system is currently limited to approximately 63,000 total AF per year. Valley Water incorporates these operational constraints into its long-term water supply planning and reliability assessments. Currently, Anderson Reservoir is offline due to a seismic retrofit project, with completion anticipated by 2030. Valley Water has rights to capture and use 223,000 AFY of the water captured at these reservoirs and diversion structures. On average, 53,000 AFY are currently used for Valley Water's supplies, though this is expected to increase to an average of 83,000 AFY by 2040 (Valley Water 2021).

Pages 4.15-3 and 4.15-4 (Section 4.15-1 Setting):

Demand Management and Water Conservation

Mountain View's Water Conservation Program, developed in collaboration with Valley Water and the Bay Area Water Supply and Conservation Agency, encompasses a wide range of water use efficiency initiatives aimed at conserving water and enhancing drought resilience. These efforts include rebate programs for high-efficiency appliances and fixtures, smart irrigation controllers, and lawn-to-garden conversions. The City also supports educational initiatives such as landscape classes, school outreach, and public events to promote conservation awareness.

The Water Conservation program includes ordinances to prevent water waste, metering of all potable water connections, conservation-oriented pricing, and advanced metering infrastructure initiatives. Demand Management Measures implemented by the City include Water-Wise House The City of Mountain View R3 Zoning District Update 4.15-4 Calls, landscape water budget reports, leak detection notifications, and participation in Valley Water's Water-Efficient Technology (WET) rebate program. Mountain View has achieved a 23 percent reduction in per capita water use compared to its 2020 target by implementing and sustaining these efforts (City of Mountain View 2021a).

In addition to these efforts, Valley Water prepares and periodically updates long-range water supply planning documents to ensure reliable water supplies for Santa Clara County. Valley Water's Water Supply Master Plan 2050 establishes strategies for meeting future water demands through a diversified portfolio of imported water, local water resources, recycled water, groundwater management, and conservation programs. The Water Supply Master Plan 2050 includes a countywide water conservation goal of achieving 126,000 acre-feet per year of water savings by 2050 through continued implementation of water use efficiency and conservation measures.

Page 4.15-9 (Section 4.15-2 Regulatory Setting):

Valley Water Water Supply Master Plan 2050

The Water Supply Master Plan 2050, adopted by Valley Water in November 2025, is the agency's long-range planning document for ensuring reliable water supplies in Santa Clara County through 2050. The Water Supply Master Plan evaluates projected future water demands, available water supplies, and infrastructure needs and identifies investment strategies intended to maintain Valley Water's level-of-service goal of meeting 100 percent of annual water demand during normal years and at least 80 percent of demand during drought years. The plan addresses challenges associated with climate change, drought, uncertainty in future water demands, and long-term water supply reliability through an adaptive management framework. Recommended strategies include development of local drought-resilient water supplies, expansion of water supply and storage projects, continued maintenance and modernization of existing infrastructure, groundwater management, recycled and purified water projects, and water conservation programs. The Water Supply Master Plan also establishes a countywide water conservation target of achieving approximately 126,000 acre-feet per year of water savings by 2050 through continued implementation of water-use efficiency measures. The City's water supply planning efforts are informed by Valley Water's long-range water supply planning framework.

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4 Mitigation Monitoring and Reporting Program

The California Environmental Quality Act (CEQA) requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Final Environmental Impact Report (Final EIR), specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

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Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Air Quality							
AQ-1 Emission Reduction Measures for Projects Exceeding the Significance Thresholds for Criteria Pollutants							
Project applicants proposing projects that exceed the Air District screening levels shall prepare a project-level criteria air pollutant assessment of construction and operational emissions at the time the project is proposed. The project level assessment shall either include a comparison of the project with other similar projects where a quantitative analysis has been conducted, or shall provide a project specific criteria air pollutant analysis to determine whether the project exceeds the Air District’s criteria air pollutant thresholds. In the event that a project-specific analysis finds that the project could result in criteria air pollutant emissions that exceed the Air District’s significance thresholds, the project applicant shall implement the following emission reduction measures to the degree necessary to reduce the impact to less than the significance thresholds, and shall implement additional feasible measures if necessary to reduce the impact to less than the significance thresholds.	Require preparation of a project-level criteria air pollutant assessment for projects that exceed Air District screening levels.	Prior to issuance of grading permits, building permits, or commencement of construction activities, and throughout construction as applicable.	Once per project, then periodically throughout construction to verify implementation of required emission reduction measures.	City of Mountain View Community Development Department, Planning Division			
	Review the assessment for consistency with applicable Air District thresholds.			City of Mountain View Community Development Department, Building Division			
	Require implementation of all applicable emission reduction measures described in Mitigation Measure AQ-1 to reduce criteria pollutant emissions below applicable thresholds.						
	Review and approve the criteria air pollutant assessment, equipment inventory, contractor certification statement, and associated emission reduction measures.						
1. The project applicant shall use electric construction equipment when feasible.							
2. The project applicant shall ensure that all diesel off-road equipment shall have engines that meet the Tier 4 Final off-road emission standards, as certified by CARB, except as provided for in this section. This requirement shall be verified through submittal of an equipment inventory that includes the following information: (1) Type of Equipment, (2) Engine Year and Age, (3) Number of Years Since Rebuild of Engine (if applicable), (4) Type of Fuel Used, (5) Engine HP, (6) Verified Diesel Emission Control Strategy (VDECS) information if applicable and other related equipment data. A Certification Statement is also required to be made by the Contractor for documentation of compliance and for future review by the BAAQMD as necessary. The Certification Statement must state that the Contractor agrees to compliance and acknowledges that a violation of this requirement shall constitute a material breach of contract. The City may waive the requirement for Tier 4 Final equipment only under the following unusual circumstances: if a particular piece of off-road equipment with Tier 4 Final standards is technically not feasible or not commercially available; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or there is a compelling emergency need to use other alternate off-road equipment. For purposes of this mitigation measure, “commercially available” shall mean the availability of Tier 4 Final engines similar to the availability for other large-scale construction projects in the region occurring at the same time and taking into consideration factors such as (i) potential significant delays to critical-path timing of construction for the project and (ii) geographic proximity to the project site of Tier 4 Final equipment.							
3. The project applicant shall require that the idling time for off-road and on-road equipment be limited to no more than 2 minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the 2-minute idling limit.							

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
AQ-2 Construction Health Risk Assessment							
For individual projects where construction activities would occur within 1,000 feet of sensitive receptors, would last longer than two months, and would not utilize a fleet comprised only of EPA rated Tier 4 engines and/or alternative fuel construction equipment or equivalent, a construction health risk assessment (HRA) shall be performed. The construction HRA shall be performed by a qualified air quality consultant coordinated through the City. The HRA shall be conducted following the Office of Environmental Health Hazards Association’s (OEHHA) 2015 Health Risk Guidelines (OEHHA 2015) and Air District guidelines to determine potential risk and compare the risk to the following Air District thresholds: - Increased cancer risk of > 10.0 in a million; - Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute); or If risk exceeds the thresholds, measures such as requiring the use of Tier 4 and/or alternative fuel construction equipment or equivalent shall be implemented to reduce the risk to appropriate levels.	Require project applicants to retain a qualified air quality consultant in the circumstances specified in the measure.	Prior to construction	Once per project	City of Mountain View Community Development Department, Planning Division			
	Require the qualified air quality consultant to prepare a construction HRA consistent with OEHHA, Air District, and City guidelines.			City of Mountain View Community Development Department, Building Division			
	Where applicable, implement mitigation measures that reduce health related risks below applicable thresholds.						
	Review and approve a construction HRA and appropriate mitigation measures.						
AQ-3 Operational Health Risk Assessment							
For individual projects that would site sensitive receptors within 500 feet of a freeway, high-volume roadway (urban road with 100,000 vehicles/day or rural road with 50,000 vehicles/day), railyard, or rail line using diesel locomotives, the project applicant shall retain a qualified air quality consultant to prepare an HRA to determine the exposure of new sensitive receptors resulting from the project to existing emission sources. The HRA shall be submitted to the City of Mountain View for review and approval. The HRA shall be conducted following the Office of Environmental Health Hazards Association’s (OEHHA) 2015 Health Risk Guidelines (OEHHA 2015) and the Air District guidelines to ensure that potential risk does not exceed the following Air District thresholds: - Increased cancer risk of > 10.0 in a million; - Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute) To ensure that potential risk does not exceed the above thresholds, project applicants shall implement the health risk reduction measures identified in the HRA. Such measures may include but are not limited to: - Install, operate, and maintain in good working order a central heating and ventilation system or other air take system in the building of a sensitive receptor that would be impacted by the project, or in each individual residential unit, that meets the efficiency standard of the minimum efficiency reporting value (MERV) of 13. The heating and ventilation system should include the following features: installation of a high-efficiency filter and/or carbon filter to minimize particulate and other airborne chemical matter from entering the building. Either high-efficiency particulate absorption filters or American Society of Heating, Refrigeration, and Air-Conditioning Engineers 85 percent supply filters should be used. - Ensure that positive pressure occurs in the building. - Achieve a performance standard of at least one air exchange per hour of fresh outside filtered air. - Achieve a performance standard of at least four air exchanges per hour of recirculation. - Achieve a performance standard of 0.25 air exchanges per hour of unfiltered infiltration if the building is not positively pressurized.	Where applicable, require preparation of an operational HRA by a qualified air quality consultant.	Prior to project approval and issuance of grading permits or building permits.	Once per project	City of Mountain View Community Development Department, Planning Division			
	Determine the health-related risks utilizing Air District thresholds.			City of Mountain View Community Development Department, Building Division			
	Implement mitigation measures that reduce health related risks to below thresholds.						
	Review and approve an operational HRA and associated mitigation measures for consistency with Air District and OEHHA 2015 Health Risk Guidelines.						

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Biological Resources							
BIO-1 Biological Resources Screening and Assessment							
The following applies to development facilitated by the R3 Zoning District Update on parcels within 250 feet of a riparian corridor, stream, wetland, drainage, top of bank, or other aquatic resource, or parcels that contain mature trees, heritage trees, substantial landscaping, stormwater facilities, remnant native vegetation, or other habitat features that may support special-status species. Prior to first discretionary approval or construction activities (if non-discretionary) and if determined necessary based on preliminary review conducted by City Staff, the City shall require project applicants to engage a qualified biologist (having the appropriate education and experience level) to perform a baseline Biological Resources Screening and Assessment to determine whether the project would have the potential to impact special-status biological resources, inclusive of special-status plants and animals, sensitive vegetation communities (including vernal pools and other wetlands), and critical habitat. If it is determined that the project site does not contain nesting birds, roosting bats, special-status species, wildlife movement functions, and other sensitive biological resources and has no potential to impact biological resources, no further action is required. If the project would have the potential to impact biological resources, a qualified biologist shall conduct a project specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 500 feet around the project footprint, as is feasible, and to determine the potential impacts to those resources. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special-status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, state, and/or federal agencies. If the project would have the potential to impact these resources, the following mitigation measures (Mitigation Measures BIO-2 and BIO 3) shall be incorporated, as applicable, to reduce impacts to a less than significant level. Pending the results of the project-specific biological analysis, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, CDFW, and/or other local, state, and federal agencies may be required. Note that specific surveys described in the mitigation measures below may be completed as part of the project-specific biological analysis where suitable habitat is present.	Obtain a qualified biologist to perform baseline Biological Resources Screening and Assessment in the circumstances specified by this mitigation measure. Determine whether the proposed project has the potential to affect special-status species, sensitive habitats, wetlands, nesting birds, wildlife movement corridors, or other sensitive biological resources. If potential impacts are identified, require preparation of a project-specific biological analysis and implementation of applicable mitigation measures. Require any additional surveys, technical studies, project design modifications, agency consultations, or permit requirements identified by the biological analysis. Review and approve all biological resource reports and supporting documentation.	Prior to the first discretionary approval or commencement of vegetation removal, grubbing, or construction activities.	Once per project, then as needed if additional surveys, studies, consultations, or construction-period measures are required.	City of Mountain View Community Development Department, Planning Division California Department of Fish and Wildlife (as applicable) United States Fish and Wildlife Service (as applicable)			
BIO-2 Endangered/Threatened Special-status Species Habitat Assessments and Protocol Surveys							
For development facilitated by the R3 Zoning District Update where the Project-specific biological analysis (Mitigation Measure BIO-1) determines that suitable habitat may be present for federal- or state-listed, candidate, or proposed species, the City shall require protocol habitat assessments/surveys be completed in accordance with current CDFW and/or USFWS protocols prior to issuance of any construction permits. If, through consultation with the CDFW and/or USFWS, it is determined that protocol habitat assessments/surveys are not required, the project applicant shall be required to complete and document this consultation and submit it to the City prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they understand the protocol requirements and shall hire a qualified biologist to conduct protocol surveys. (Note: if a federally and/or state-listed wildlife species will be impacted, federal and/or state take authorization may be required by USFWS and CDFW.)	Require project applicants to retain a qualified biologist to conduct protocol habitat assessments and surveys in the circumstances specified by this mitigation measure. Conduct surveys in accordance with current CDFW and/or USFWS protocols and required survey timing windows. Where applicable, require documentation of the consultation and agency concurrence. Review and approve all survey results, agency correspondence, and supporting biological documentation. Obtain applicable state or federal permits or take authorizations if protected species may be affected.	Prior to issuance of building permits, grading permits, or commencement of construction activities.	Once per project.	City of Mountain View Community Development Department, Planning Division California Department of Fish and Wildlife United States Fish and Wildlife Service			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
BIO-3 Endangered/Threatened Animal Species Avoidance and Minimization							
For development facilitated by the R3 Zoning District Update where potential impacts to aquatic and/or terrestrial animal species are identified by the project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1, the following measures shall be applied.	Implement all avoidance and minimization measures identified through the project-specific biological analysis.	Prior to and during vegetation removal, grading, ground disturbance, and construction activities; prior to work in suitable habitat areas; and throughout construction where biological monitoring is required.	Once per project prior to construction; daily during applicable construction activities; weekly or other approved intervals where authorized by CDFW or USFWS; and as needed throughout construction.	City of Mountain View Community Development Department, Planning Division			
1. Ground disturbance shall be limited to the minimum necessary to complete the project. A qualified biologist shall flag the project limits of disturbance. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance.	Project applicant to retain a qualified CDFW- and/or USFWS-approved biologist to oversee implementation of biological avoidance measures and conduct required preconstruction surveys and monitoring.			City of Mountain View Community Development Department, Building Division			
2. All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and October 31, if feasible, to avoid impacts to sensitive aquatic species. Any work outside these dates would require project-specific approval from the City and may be subject to regulatory agency approval.	Establish construction limits, install protective fencing and exclusion fencing where required, and maintain fencing throughout construction.						
3. All projects occurring within or adjacent to sensitive habitats that may support federally and/or state-listed endangered/threatened species shall have a CDFW- and/or USFWS-approved biologist present during all initial ground disturbing/vegetation clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed, said biologist shall conduct daily pre-activity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the CDFW and/or USFWS, said biologist may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are fully implemented.	Restrict construction activities, vehicle staging, fueling, and equipment operation in accordance with approved biological protection measures.						
4. No endangered/threatened species shall be captured and relocated without express permission from the CDFW and/or USFWS.	Suspend work and consult with resource agencies if listed species are observed within or adjacent to the construction area.						
5. If at any time during project construction an endangered/threatened species enters the construction site or otherwise may be impacted by the project, all project activities shall cease. A CDFW/USFWS-approved biologist shall document the occurrence and consult with the CDFW and USFWS, as appropriate, to determine whether it was safe for project activities to resume.	Conduct preconstruction surveys, daily clearance surveys, monitoring inspections, and habitat protection measures as required by the approved biological analysis and applicable permits.						
6. For all work occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved qualified biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete.	Consult with CDFW and USFWS regarding mitigation banking, regulatory requirements, avoidance measures, and compliance with the federal and state Endangered Species Acts, as applicable.						
7. All vehicle maintenance/fueling/staging shall occur more than 150 feet from any riparian habitat or water body, including seasonal wetland features, to the maximum extent feasible. Suitable containment procedures shall be implemented to prevent spills. Where maintaining this setback is not feasible, secondary containment shall be required and suitable containment procedures shall be implemented. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies.	Review and approve monitoring reports, survey documentation, and evidence of compliance with required avoidance and minimization measures.						
8. No equipment shall be permitted to enter wetted portions of any affected drainage channel or wetland.							
9. At the end of each workday, excavations shall be secured with a cover or a ramp provided to prevent wildlife entrapment.							
10. All trenches, pipes, culverts, or similar structures shall be inspected for animals prior to burying, capping, moving, or filling.							

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
11. Considering the potential for the project to impact federally and state-listed species (and potentially other special-status species) and their habitat, the City shall contact CDFW and USFWS to identify mitigation banks within Santa Clara County during project development. If the results of the project-specific biological analysis (Mitigation Measure BIO-1) determine that impacts to federally and state threatened or endangered species (and potentially other special-status species) habitat are expected, City and/or applicant shall explore species-appropriate mitigation bank(s) servicing the region for purchase of mitigation credits.							
12. Prior to grading and construction in natural areas of containing suitable upland habitat, a qualified biologist shall conduct a preconstruction survey as determined necessary during the biological analysis (Mitigation Measure BIO-1). The survey should include a transect survey over the entire project disturbance footprint (including access and staging areas), and mapping of suitable habitat features, such as burrows, that are potentially suitable for listed species. If any listed species are detected, no work shall be conducted until the individual(s) leaves the site of their own accord, unless federal and/or state “take” authorization has been issued for relocation. Typical preconstruction survey procedures, such as burrow scoping and burrow collapse, cannot be conducted without federal and state permits. If any life stage of listed species are found within the survey area, the City and/or applicant shall consult with the USFWS and CDFW to determine the appropriate course of action to comply with the FESA and CESA, if permits are not already in place at the time of construction.							

Cultural Resources

CUL-1a Historical Resource Protection

The historical resources evaluation described below shall not be required if a property is already a historical resource as defined by CEQA Guidelines Section 15064.5(a), or has been evaluated as ineligible pursuant to the criteria outlined in CEQA Guidelines Section 15064.5(a)(3), or evaluated in a survey meeting the requirements of 5024.1(g) of the California Public Resources Code. In 2023, the City conducted a reconnaissance survey of the following structures if they were built before 1980: multi-family and nonresidential buildings City-wide, single-family and duplex dwellings outside of R zones, and previously identified resources. The survey identified a select few for intensive-level evaluation and nomination to the City’s Register, which shall not require re-evaluation. Other information from the survey may be used, as appropriate, to inform site-specific evaluations.

A historical resources evaluation shall be prepared for development projects involving the demolition or substantial physical alteration of a building, structure, object, site, or historic district that is 45 years of age or older. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior’s Professional Qualifications Standards (PQS) in architectural history or history (Qualified Architectural Historian). The Qualified Architectural Historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify potential historical resources that could be subject to direct or indirect impacts as a result of the proposed development. All properties 45 years of age or older shall be evaluated for eligibility for listing in the NRHP, CRHR and Mountain View Register of Historic Resources within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. All evaluated properties shall be documented on California Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the City for review and concurrence. The final report shall be submitted to the Northwest Information Center.

Require preparation of a Historical Resources Evaluation (HRE) in the circumstances specified by the mitigation measure.

Project applicant to retain a Qualified Architectural Historian, meeting the Secretary of the Interior’s Professional Qualification Standards, to prepare the HRE.

Evaluate all applicable resources for eligibility for listing in the National Register of Historic Places, California Register of Historical Resources, and Mountain View Register of Historic Resources.

Prepare required California Department of Parks and Recreation Series 523 Forms and supporting documentation.

Submit the HRE to the City for review and concurrence and submit the final evaluation to the Northwest Information Center.

Review and approve all historical resource documentation prior to project approval and permit issuance.

Prior to project approval and prior to issuance of demolition, grading, or building permits for projects involving demolition or substantial physical alteration of resources 45 years of age or older.

Once per project.

City of Mountain View
Community Development
Department, Planning Division

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
CUL-1b Historical Resources Treatment							
If a project would occur on a site containing a historical resource as identified during implementation of Mitigation Measure CUL-1a, impacts shall be mitigated to historical resources identified within a proposed development site. Application of mitigation shall be overseen by a Qualified Architectural Historian and/or historic architect meeting the PQS. Mitigation must include avoidance, or preservation, rehabilitation, restoration, or reconstruction of the resource consistent with the Secretary of the Interior’s Standards for the Treatments of Historic Properties (Standards) in accordance with the City’s Standard Conditions of Approval. In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR Section 15126.4[b][1]). A report identifying and specifying the project description, treatment of character-defining features, and compliance with the Standards shall be submitted to the City for review and approval prior to the issuance of permits. If historical resources are identified on a development site and required compliance with the Standards and/or avoidance is not possible, then a project specific EIR will be required with project specific mitigation measures.	Require project applicants to avoid, preserve, rehabilitate, restore, or reconstruct identified historical resources consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties. Retain a Qualified Architectural Historian and/or historic architect to oversee implementation of historical resource treatment measures. Require preparation of a report demonstrating compliance with the Secretary of the Interior’s Standards, including treatment of character-defining features. Review and approve the treatment report and proposed mitigation measures. If avoidance or compliance with the Secretary of the Interior’s Standards is not feasible, require additional environmental review and project-specific mitigation measures as applicable.	Prior to issuance of demolition, grading, or building permits and throughout implementation of approved treatment measures, as applicable.	Once per project, then as needed during implementation of approved treatment measures.	City of Mountain View Community Development Department, Planning Division City of Mountain View Community Development Department, Building Division			
CUL-2a Archaeological Resources Assessments							
Prior to approval of a project that involves substantial ground disturbance activities such as grading, trenching, or excavation, an Archaeological Resources Assessment shall be prepared under the supervision of an archaeologist that meets the Secretary of the Interior’s Professional Qualification Standards in either prehistoric or historic archaeology (Qualified Archaeologist) as defined in Code of Federal Regulations, Title 36, Part 61). Projects involving minor ground disturbance such as landscaping, planting, pruning, repaving, or other activities with limited ground disturbance would not require an Archaeological Resources Assessment. Archaeological Resources Assessments shall include a California Historical Resources Information System records search at the Northwest Information Center (NWIC), a Sacred Lands File search maintained by the Native American Heritage Commission, intensive-level pedestrian survey, and archaeological sensitivity analysis utilizing review of ethnographic data, and historical, geological, and soil maps, aerial imagery, and geotechnical reports. A Qualified Archaeologist shall identify known archaeological resources and classify the project site as having high, moderate, or low sensitivity for unknown archaeological resources. The assessment shall also include recommendations for additional studies and/or mitigation, as necessary. The assessment shall be completed prior to project approval. The final report must be submitted to the Northwest Information Center. If the Archaeological Resources Assessment identifies resources that may be affected by the project, an Extended Phase I testing program and/or Phase II testing and evaluation may be required, as determined by the Qualified Archaeologist, to identify the extent and significance of the resource. Extended Phase I testing and Phase II testing and evaluation must be completed prior to project construction. If resources are determined eligible for the NRHP and/or CRHR or unique archaeological resources as defined by PRC 21083.2(g), avoidance or preservation-in-place may reduce impacts to a less than significant level. If avoidance is not possible, then a project specific EIR will be required with project specific mitigation measures. The City will review and approve reports and ensure that mitigation measures are implemented as appropriate prior to or during construction.	Require preparation of an Archaeological Resources Assessment for projects involving substantial ground disturbance activities. Project applicant to retain a Qualified Archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards, to prepare the assessment. Ensure the assessment includes a records search, Sacred Lands File search, intensive pedestrian survey, archaeological sensitivity analysis, and recommendations for additional studies or mitigation, as necessary. Review and approve the Archaeological Resources Assessment and any recommended monitoring or mitigation measures. Require completion of Extended Phase I testing, Phase II testing and evaluation, or other additional studies if warranted by assessment findings. Require implementation of avoidance, preservation-in-place, monitoring, or other approved mitigation measures prior to construction, as applicable. Submit final documentation to the Northwest Information Center.	Prior to project approval and prior to issuance of grading permits, building permits, or commencement of ground-disturbing activities.	Once per project, then as-needed based on assessment findings and required follow-up studies.	City of Mountain View Community Development Department, Planning Division			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
CUL-2b Unanticipated Discoveries							
In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and a Qualified Archaeologist shall be contacted immediately to evaluate the resource. If the resource is determined by the Qualified Archaeologist to be of Native American origin, then a Native American representative shall also be contacted to participate in the consultation concerning the resource. If the PQS archaeologist determines it to be appropriate, in coordination with the Native American representative, archaeological testing for NRHP and/or CRHR eligibility shall be completed. If the resource proves to be eligible for the NRHP and/or CRHR and significant impacts to the resource cannot be avoided via project redesign, a PQS archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. The data recovery plan shall be implemented prior to any additional disturbances of potentially sensitive deposits. The City shall review and approve all archaeological work prior to implementation and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Section 15126.4(b)(3)(C).	Require cessation of ground-disturbing activities within 50 feet of any unanticipated archaeological discovery. Project applicant to retain a Qualified Archaeologist to evaluate the discovery and determine its significance. Require consultation with an appropriate Native American representative if the resource is determined to be of Native American origin. Conduct additional testing and evaluation, if warranted, to determine eligibility for listing in the National Register of Historic Places or California Register of Historical Resources. Require preparation and implementation of a data recovery plan if avoidance is infeasible and the resource is determined to be significant. Review and approve all archaeological investigations, data recovery efforts, and supporting documentation prior to resumption of work in the affected area. Submit resulting reports and documentation to the appropriate California Historical Resources Information System repository.	During construction and ground-disturbing activities if archaeological resources are encountered.	As needed if an inadvertent discovery occurs.	City of Mountain View Community Development Department, Planning Division City of Mountain View Community Development Department, Building Division Native American representative (as applicable)			
Geology and Soils							
GEO-1 Paleontological Resources Protection							
For projects that involve substantial excavation in undisturbed sediments greater than 2 feet below the surface in areas mapped as alluvial fan and fluvial deposits (Pleistocene), or greater than 5 feet below the surface in areas mapped as artificial fill, artificial levee fill, artificial stream channels, Bay Mud, basin deposits, flood-plain deposits, natural levee deposits, or alluvial fan and fluvial deposits (Holocene), as mapped in Figure 4.5-4, the applicant shall prepare and implement a Paleontological Resources Mitigation and Monitoring Plan (PRMMP) or implement the following measures: Worker Environmental Awareness Program (WEAP) Training. The Qualified Paleontologist or their designee shall conduct WEAP training for all construction personnel involved in ground-disturbing activities, regarding the appearance of fossils and the procedures for notifying paleontological staff in the event that fossils are discovered by on-site personnel. Construction Monitoring. Monitoring during ground construction activities (i.e., grading, trenching, foundation work, and other excavations) shall be conducted by a qualified paleontological monitor, who is defined as an individual who meets the minimum qualifications per standards set forth by the SVP (2010), which includes a B.S. or B.A. degree in geology or paleontology with one year of monitoring experience and knowledge of collection and salvage of paleontological resources. Full-time paleontological monitoring shall occur for ground-disturbing activities in undisturbed sediments with high paleontological sensitivity. Initial, part-time monitoring shall occur in undisturbed sediments with undetermined paleontological sensitivity to determine whether the sediments should be considered high- or low sensitivity. The frequency and duration of this initial part-time monitoring shall be at the discretion of the Qualified Paleontologist. If the Qualified Paleontologist determines that the	Require project applicants to retain a Qualified Paleontologist to prepare a Paleontological Resources Mitigation and Monitoring Plan (PRMMP) or implement the mitigation requirements identified in Mitigation Measure GEO-1 where applicable. Require completion of Worker Environmental Awareness Program (WEAP) training for construction personnel involved in ground-disturbing activities. Require paleontological monitoring during grading, trenching, foundation work, and other ground-disturbing activities where applicable. Review and approve the monitoring schedule, reporting procedures, and any modifications to monitoring frequency recommended by the Qualified Paleontologist. Require suspension of work in the vicinity of any paleontological discovery until the resource has been evaluated by the Qualified Paleontologist. Require salvage, identification, preparation, curation, and documentation of significant paleontological resources consistent with Society of Vertebrate Paleontology standards. Review and approve final paleontological monitoring reports and documentation.	Prior to issuance of grading permits and commencement of ground-disturbing activities; during excavation, grading, trenching, foundation work, and other ground-disturbing activities; and following completion of paleontological monitoring and reporting.	Once per project prior to construction; full-time or part-time during ground-disturbing activities, as determined by the Qualified Paleontologist; and as needed if paleontological resources are encountered.	City of Mountain View Community Development Department, Planning Division City of Mountain View Community Development Department, Building Division			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
monitoring methods or schedule should be altered based on the specific geologic conditions at the surface or at depth (e.g., reduced/increased in frequency, ceased entirely), the Qualified Paleontologist may recommend such changes to the City, and those changes shall not be enacted until the City's approval is received. • Paleontological Discovery. In the event a fossil is discovered by construction personnel or the paleontological monitor, all work in the immediate vicinity of the find shall cease and the Qualified Paleontologist shall be contacted to evaluate the find before re-starting work in the area. If it is determined that the fossil(s) is (are) scientifically significant, then it shall be salvaged, identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps.							
Hazards and Hazardous Materials							
HAZ-1 Phase I Environmental Site Assessment							
Prior to the start of construction (demolition or grading), the project applicant shall retain a qualified environmental professional (EP), as defined American Society for Testing and Materials Standard (ASTM) E1527 to prepare a project-specific Phase I Environmental Site Assessment (ESA) in accordance with standard ASTM methodologies, to assess the land use history of the project site. The Phase I assessment shall include a records review of appropriate federal, State, and local databases within ASTM-listed search distances regarding hazardous materials use, storage, or disposal at the given site, a review of historical topographic maps and aerial photographs, a site reconnaissance, interviews with persons knowledgeable about the sites historical uses, and review of other relevant existing information that could identify the potential existence of Recognized Environmental Conditions, including hazardous materials, or contaminated soil or groundwater. If no Recognized Environmental Conditions are identified, then no further action would be required. If Recognized Environmental Conditions are identified and the Phase I assessment recommends further action, the project applicant shall conduct the appropriate follow up actions, which may include preparation of a Phase II ESA, further records review, sampling of potentially hazardous materials, and possibly site cleanup. In the event that site cleanup is required, the project shall not proceed until the site has been cleaned up to the satisfaction of the appropriate regulatory agency (e.g., DTSC, RWQCB, or SCCEHD) such that the regulatory agency issues a No Further Action letter or equivalent. As part of the Phase II ESA, the qualified environmental consultant (PG or PE) shall screen the analytical results against the San Francisco Bay Regional Water Quality Control Board environmental screening levels (ESL). These ESLs are risk-based screening levels under various depth and land use scenarios. The lead agency shall review, approve, and implement recommendations of the Phase II ESA prior to demolition and grading (construction).	Require project applicants to retain a qualified Environmental Professional to prepare a Phase I Environmental Site Assessment (ESA) in accordance with applicable ASTM standards. Determine whether Recognized Environmental Conditions are present on the project site. If Recognized Environmental Conditions are identified, require preparation of a Phase II ESA, including sampling and analysis, as appropriate. Review and approve all Phase II ESA recommendations and findings. Where applicable, require preparation and implementation of a remediation, cleanup, or corrective action plan approved by the applicable regulatory agency. Verify completion of all required remediation activities and receipt of applicable regulatory agency clearances, including a No Further Action determination or equivalent documentation, prior to construction. Review and approve implementation of all recommendations contained in the Phase I ESA and Phase II ESA, if applicable.	Prior to issuance of grading permits, building permits, demolition permits, or commencement of construction activities; then as needed based on the results of site investigations and regulatory review.	Once per project, then as needed if additional investigations, remediation, or regulatory agency oversight is required.	City of Mountain View Community Development Department, Planning Division City of Mountain View Community Development Department, Building Division California Department of Toxic Substances Control (as applicable) San Francisco Bay Regional Water Quality Control Board (as applicable) Santa Clara County Department of Environmental Health (as applicable) United States Environmental Protection Agency (as applicable)			

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Noise							
NOI-1 Pile Driving Noise Reduction							
If pile driving activities are proposed within 50 feet of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental health care facilities, places of worship, libraries and museums, transient lodging, and office building interiors) the following measures shall be implemented: • The project applicant shall prepare a pile driving noise reduction plan, which shall be submitted to the City for approval prior to the start of construction. The plan will include but is not limited to the following measures: With approval of the project structural engineer, pile holes will be pre-drilled to minimize the number of impacts necessary to seat the pile. • Pile driving shall be scheduled to have the least impact on nearby sensitive receptors, where feasible (e.g., operating during mid-day hours, avoiding operation during school hours, etc.). • Pile drivers with the best available noise control technology will be used. For example, pile driving noise control may be achieved by shrouding the pile hammer point of impact, by placing resilient padding directly on top of the pile cap, and/or by reducing exhaust noise with a sound-absorbing muffler. • Alternatives to impact hammers, such as caisson drilling (drilling piles), vibratory pile driving, oscillating or rotating pile installation methods, and jetting or partial jetting of piles into place using a water injection at the tip shall be used, where feasible.	Where applicable, require project applicants to prepare a project-specific pile driving noise reduction plan for City review and approval.	Prior to issuance of grading or building permits and prior to commencement of pile driving activities; during pile driving and other applicable construction activities.	Once per project prior to construction; periodic during pile driving activities to verify compliance with approved noise reduction measures.	City of Mountain View Community Development Department, Planning Division			
	Review and approve the pile driving noise reduction plan and verify incorporation of all feasible noise reduction measures identified in Mitigation Measure NOI-1.			City of Mountain View Community Development Department, Building Division			
	Require implementation of noise reduction measures identified in Mitigation Measure NOI-1 where feasible.						
	Verify that approved noise reduction measures have been incorporated into project plans, specifications, and contractor requirements prior to commencement of pile driving activities.						
	Monitor implementation of required noise reduction measures during construction.						
NOI-2 Pile Driver Vibration Reduction Measures							
If pile driving activities are proposed within 135 feet of an historic structure or 100 feet from a timber/masonry structure (residential building) or Engineered Concrete/Masonry structure (commercial building), the following measures shall be implemented: • The project applicant shall retain a qualified consultant to prepare a project-specific construction vibration impact analysis. • Pile driving vibration shall not exceed 0.12 in/sec PPV at buildings extremely susceptible to vibration damage (i.e., historic buildings); groundborne vibration levels exceeding 0.2 in/sec PPV at non-engineered timber and masonry buildings (i.e., residential buildings) and engineered Concrete/Masonry structure (commercial building). • Provided the analysis concludes vibration levels do not exceed 0.12 in/sec PPV at buildings extremely susceptible to vibration damage (i.e., historic buildings); groundborne vibration levels exceeding 0.2 in/sec PPV at non-engineered timber and masonry buildings (i.e., residential buildings) or engineered Concrete/Masonry structure (commercial building), construction may proceed without additional measures. • Provided the analysis concludes that pile driving vibration levels exceed 0.12 in/sec PPV at buildings extremely susceptible to vibration damage (i.e., historic buildings); groundborne vibration levels exceeding 0.2 in/sec PPV at non-engineered timber and masonry buildings (i.e., residential buildings) or engineered Concrete/Masonry structure (commercial building), additional measures shall be implemented to reduce vibration levels below the standard, as determined by the qualified consultant. These measures may include, but not be limited to, pre-drilling pile holes, utilizing a vibratory pile driver, or performing pile driving at a further distance from the noise sensitive land use to reduce vibration levels. • The analysis of nighttime pile driving vibration shall be completed in accordance with industry standards. The analysis shall consider the type of pile driver to be used and potential vibration levels at vibration-sensitive receivers located within 160 feet of the R3 Zoning District Update Site.	Require project applicants to retain a qualified acoustical consultant to prepare a project-specific construction vibration analysis where applicable.	Prior to issuance of grading or building permits and prior to commencement of pile driving activities; during construction where vibration-generating activities occur.	Once per project prior to construction; during construction as needed where vibration-generating activities occur or monitoring is required.	City of Mountain View Community Development Department, Planning Division			
	Review and approve the vibration analysis and verify compliance with applicable vibration thresholds.			City of Mountain View Community Development Department, Building Division			
	Require implementation of all recommendations identified in the vibration analysis necessary to reduce vibration impacts below applicable thresholds as identified by Mitigation Measure NOI-2 or otherwise identified by the qualified consultant.						
	Require construction vibration monitoring where applicable.						
	Review monitoring reports and verify compliance with approved vibration reduction measures.						

Mitigation Measure	Action Required	Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Tribal Cultural Resources							
TCR-1 Suspension of Work Around Potential Tribal Cultural Resources							
In the event archaeological resources of Native American origin are identified during construction on the R3 Zoning District Update sites, all earth-disturbing work within 50 feet of the find shall be suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City of Mountain View, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with local Native American group(s). The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery. The City of Mountain View shall review and approve the plan prior to implementation.	Project applicant must require all construction contracts to include procedures for the identification and treatment of potential tribal cultural resources. In the event archaeological resources of Native American origin are encountered during ground-disturbing activities, require suspension or redirection of work within 50 feet of the discovery until the resource has been evaluated by a qualified archaeologist and consultation with an appropriate Native American representative has occurred. Require preparation of a tribal cultural resource treatment plan if the resource is determined by the City, in consultation with Native American representatives, to qualify as a tribal cultural resource under CEQA. Review and approve the treatment plan prior to implementation. Require implementation of all treatment measures identified in the approved plan or other appropriate treatment measures developed in consultation with Native American representatives and, if applicable, a qualified archaeologist. Verify completion of all consultation requirements and approved treatment measures before work resumes within the affected area.	During ground-disturbing activities if a potential tribal cultural resource is encountered; prior to resumption of work in the vicinity of the discovery.	As needed if a potential tribal cultural resource is discovered during construction.	City of Mountain View Community Development Department, Planning Division City of Mountain View Community Development Department, Building Division Native American representative(s) (as applicable)			